City of Salinas Economic Development Element

Draft Program EIR

State Clearinghouse No. 2015111036

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SUMMARY

CEQA REQUIREMENTS

CEQA Guidelines Section 15123 requires an EIR to contain a brief summary of the proposed project and its consequences. This summary identifies each significant effect and the proposed mitigation measures and alternatives to reduce or avoid that effect; areas of controversy known to the lead agency; and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

This summary also includes a brief summary of the project description. Detailed project description information, including figures illustrating the project location and components, is included in Section 2.0 Project Description.

PROJECT DESCRIPTION SUMMARY

The City of Salinas is proposing general plan amendments needed to formally adopt a new element of the City of Salinas General Plan. The new element, the draft City of Salinas Economic Development Element (hereafter “EDE” or “proposed project”) was originally completed in 2014 and accepted, but not adopted, by the City of Salinas City Council in June 2014. The document was updated in 2017.

Details regarding the contents of the EDE and the general plan amendments proposed to adopt the EDE are described in Section 2.0, Project Description. Proposed draft EDE policies which have potential to result in physical change, the environmental impacts of which must be evaluated under CEQA, are identified in the Draft Program EIR. The proposed project would provide capacity for new land development to meet the balance of the City’s projected employment needs through buildout of the existing General Plan that cannot be met through the infill development within the city limits and development of vacant land within the City’s existing Sphere of Influence (SOI).
New development capacity would be directed to six “Target Areas” containing a total of 558 acres of land. One (1) of the Target Areas (115 acres) is located within the city limits within the Carr Lake area. The remaining five Target Areas (443 acres) are located outside of, but adjacent to, the City’s SOI. Two of these five Target Areas are located to the north/northwest of the City and three are located to the south/southeast of the City. Please refer to Figure 2, Aerial Photograph – Existing Conditions, in Section 2.0, Project Description, for the locations of the Target Areas. The City has assigned General Plan land use designations to each of the Target Areas. The land use designations include Industrial (147 acres), Retail (279 acres) and Business Park (132 acres). Figure 6, Target Areas and Economic Development Reserve Areas, in Section 2.0 shows the land use designations.

Based on analysis of floor area ratios for each land use type and land demand for non-building needs (e.g. infrastructure, roads, etc.), a total of 5,255,959 square feet of new building capacity could be accommodated within the six Target Areas. Total new employment capacity is projected at 8,981 jobs. Table S-1, New Development and Employment Capacity, summarizes this information.

<table>
<thead>
<tr>
<th>Target Area Land Use</th>
<th>Gross Acres</th>
<th>Building Capacity per Land Use Type</th>
<th>Employment Density (Bldg. Square Feet/Job)</th>
<th>Projected Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial</td>
<td>147</td>
<td>1,502,820</td>
<td>1,000</td>
<td>1,503</td>
</tr>
<tr>
<td>Retail</td>
<td>279</td>
<td>2,193,448</td>
<td>550</td>
<td>3,988</td>
</tr>
<tr>
<td>Business Park</td>
<td>132</td>
<td>1,570,338</td>
<td>450</td>
<td>3,490</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>558</strong></td>
<td><strong>5,255,959</strong></td>
<td><strong>8,981</strong></td>
<td></td>
</tr>
</tbody>
</table>

*Total differs from sum of individual line items due to rounding of data used as input to this table. See Section 2.0, Project Description, for more information.

All future individual development projects proposed within any of the six Target Areas will undergo additional CEQA review to examine their project-specific environmental impacts. Future development proposed within the one Target Area located within the city limits could then be considered and approved by the City. The City does not have land use control over the five Target Areas located outside the SOI. For development of these Target Areas to occur in the future, the City must request and receive approval from the Monterey County Local Agency Formation Commission to amend the City’s SOI to include and to annex the Target Areas prior to approval of future development proposals for these areas. These five Target Areas would be considered new Future Growth Areas per the General Plan, and would therefore require a specific plan to guide future development and the approval of future development proposals.
**Summary of Impacts and Mitigation Measures**

*Project Impacts*

The proposed project will have a range of significant impacts. Each of the significant impacts is identified in Table S-2, Significant Impacts and Mitigation Measures, located at the end of this Summary section. The table lists each significant impact by topic area, the level of significance of each impact, mitigation measures to avoid or substantially minimize each impact, and the level of significance of each impact after implementation of the mitigation measures.

*Areas of Controversy Known to the Lead Agency*

CEQA Guidelines section 15123, subdivision (b)(2) provides that the EIR shall identify “areas of controversy known to the Lead Agency including issues raised by agencies and the public.”

Although the lead agency is not aware of controversial issues associated with the proposed project, through the NOP process, a range of topics and issues were recommended for analysis in the EIR analysis. Issues included, but may not be limited to:

- alternatives regarding compact growth and infill development;
- loss of agricultural land;
- indirect conversion of open space to agricultural use due to urban expansion and related loss of agricultural land;
- conflict with Williamson Act zoning and/or agricultural conservation easements;
- baseline conditions;
- water demand and impacts on groundwater;
- impacts from expressways proposed in the EDE;
- alternatives based on increased floor to area ratios/improved compact growth;
- consistency with Monterey County Local Agency Formation Commission policies and approval requirements;
SUMMARY

- relationship of the proposed project to the Greater Salinas Area Memorandum of Understanding (GSA MOU) between the City and the County; and
- effects on County roads.

Letters received in response to the NOP are included in Appendix A.

SUMMARY OF ALTERNATIVES

Section 15126.6 of the CEQA Guidelines states that an EIR must address “a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

The project objectives are included in Section 2.0, Project Description.

The following project alternatives were considered and analyzed in detail:

- Alternative 1: No Project/No Development
  This alternative considers the impacts of development of the Target Areas under existing plans. In this case, the Target Area within the city limits would be developed with uses that are consistent with the City of Salinas General Plan land use designation of Park that applies to land within the Target Area. The five Target Areas located outside the City’s SOI are within unincorporated Monterey County and are designated Agriculture in the County of Monterey General Plan. This alternative would eliminate 443 acres, or approximately 79 percent, of the total of 558 acres of land development included in the proposed project. All 443 acres are within the Target Areas located outside of the SOI and would continue in agricultural use as guided by the Monterey County General Plan.

- Alternative 2: GSA MOU Amendment
  This alternative is evaluated solely at the request of the County of Monterey Resource Management Agency. This alternative removes one of the Target Areas located outside of the City’s SOI from the proposed project in light of the County’s concern that its development would result in loss of high value agricultural land to the south of the City. Conserving such land is a topic that is addressed in the 2006 GSA MOU. Development capacity included in the eliminated Target Area would be transferred to a different Target Area such that the total building square footage included in the proposed project remains the same. The total land area that could be developed under this alternative is reduced by about 27 acres, or about five percent of the total area included in the proposed project.
Alternative 3: GSA MOU Consistency

This alternative includes further modifications to the proposed project that maximize its consistency with the GSA MOU. It modifies the proposed project by eliminating four of the five Target Areas that are located outside the City’s SOI. Only two of the Target Areas would remain, one of which is the Target Area located within the city limits. Relative to the proposed project, this alternative reduces developable land area by about 427 acres, or 77 percent, and reduces building development capacity by about 73 percent.

Alternative 4: Target Area V

This alternative considers environmental effects of changing the Retail land use designation proposed for the Target Area within Carr Lake to Mixed Use and relocating a portion of the Target Area. All other aspects of the proposed project are retained. It would not result in a reduction of developable land area or in a reduction of building square footage relative to the proposed project.

Each of these alternatives is discussed in detail in Section 6.0, Alternatives. Other alternatives were considered, but not analyzed in detail. These include: relocation of Target Area development capacity to infill sites, redesignation of existing vacant residential lands to employment generating land use(s), and increased floor to area ratio for non-residential uses. These too are discussed in Section 6.0.

Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. If the environmentally superior alternative is the No Project/No Development alternative, the EIR must also identify an environmentally superior alternative among the other alternatives.

The No Project/No Development Alternative is environmentally superior alternative. It would avoid or substantially lessen many of the significant or significant and unavoidable impacts of the proposed project. Further, this alternative results in less building capacity and developed land area than any other alternative; therefore, all effects of this alternative would be reduced to a greater extent than any other alternative. However, the No Project/No Development Alternative would achieve none of the project objectives. Of the remaining three alternatives, Alternative 3 – GSA MOU Consistency is the environmentally superior alternative. However, relative to the proposed project, the GSA MOU Consistency Alternative would not achieve a primary objective of the proposed project to provide new land capacity for employment-generating development to meet employment needs through General Plan buildout, nor would it achieve several other project objectives.
### Table S-2, Significant Impacts and Mitigation Measures

<table>
<thead>
<tr>
<th>Description of Significant Impact</th>
<th>Significance without Mitigation</th>
<th>Mitigation Measure(s)</th>
<th>Significance after Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Aesthetics</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Substantial modification of existing visual character and adverse effect on scenic views/vistas from development of Target Areas B and K</td>
<td>Significant and Unavoidable</td>
<td>Implementation of General Plan policies and design standards in the Zoning Code to promote visual quality of future development would lessen but not avoid the impact.</td>
<td>Significant and Unavoidable</td>
</tr>
<tr>
<td><strong>Agriculture and Forest Resources</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conversion of 502 acres of Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) to non-agricultural use</td>
<td>Significant and Unavoidable</td>
<td>AG-1. Developers of future projects within each Target Area shall provide mitigation for conversion of important farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) to non-agricultural use resulting from development within the Target Areas. At a minimum, mitigation shall include payment of an agricultural land conservation in-lieu fee in effect at the time individual projects are proposed within the Target Areas or dedication of a permanent conservation easement to a qualified third-party farmland conservation entity on off-site agricultural land of equal or better quality at a ratio of 1:1. If payment of an in-lieu fee is proposed by individual project applicants, the fee amount</td>
<td>Significant and Unavoidable</td>
</tr>
<tr>
<td>Description of Significant Impact</td>
<td>Significance without Mitigation</td>
<td>Mitigation Measure(s)</td>
<td>Significance after Mitigation</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>---------------------------------</td>
<td>------------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>Potential Revisions to Map</td>
<td>Potentially Significant</td>
<td>AG-2. To avoid conflicts between future urban development within Target Area B and Target Area V and the Williamson Act contracted use of land within each Target Area, one of the following mitigation options will be implemented by the City: a. Development defined as incompatible with a Williamson Act contract pursuant to Government Code Section 51201(e) will be prohibited within the portions of Target Areas B and V that are under Williamson Act contract until the applicable Williamson Act contracts are terminated through cancellation or non-renewal; or b. The boundaries of Target Areas B and V will be modified to exclude the acreage within a Williamson Act contract.; or c. The portions of Target Areas B and V located on land</td>
<td></td>
</tr>
<tr>
<td>Description of Significant Impact</td>
<td>Significance without Mitigation</td>
<td>Mitigation Measure(s)</td>
<td>Significance after Mitigation</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>--------------------------------</td>
<td>------------------------</td>
<td>------------------------------</td>
</tr>
</tbody>
</table>
|Conflicts with a Permanent Agricultural Conservation Easement from Development of Target Area B| Potentially Significant| AG-3. To avoid potential conflicts with a permanent agricultural conservation easement resulting from future development within Target Area B, one of the following mitigation options will be implemented by the City:  
a. Development will be prohibited within parcels under permanent agricultural conservation easement; or  
b. Coordinate with the Ag Land Trust to exchange the existing agricultural conservation easement with which development of Target Area B could be in conflict with one or more new conservation easements placed on agricultural land in an alternative location such that conflicts are eliminated. | | |
<table>
<thead>
<tr>
<th>Description of Significant Impact</th>
<th>Significance without Mitigation</th>
<th>Mitigation Measure(s)</th>
<th>Significance after Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development of urban uses with potential to facilitate conversion of Important Farmland to non-agricultural use</td>
<td>Potentially Significant</td>
<td>could conflict with the agricultural conservation easement, one or more of the mitigation options shall be implemented through project design, conditions of approval, and/or project-specific CEQA mitigation requirements.</td>
<td>AG-4. As part of the development review process for future individual projects proposed within Target Areas where such development is located adjacent to actively cultivated agricultural land, the City will determine whether agricultural buffers are required to reduce potential conflicts between proposed urban development and active agricultural operations. Where buffers are required, individual development projects shall be designed to incorporate buffers. Buffers shall be designed on a site-by-site basis to consider potential externalities from adjacent agricultural uses and to minimize potential health and safety effects of these externalities on users of the development proposed adjacent to the agricultural uses. Buffers shall be placed within the boundary of the urban use unless otherwise agreed to by the developer and owner of the adjacent agricultural use. Buffers may consist of open space, landscaped berms, roads, landscape features, or other features. Buffer locations shall be identified in development plans and include accompanying descriptions that demonstrate how potential conflicts between developed uses and adjacent agricultural uses will be minimized. In cases where adjacent agricultural land is</td>
</tr>
<tr>
<td>Description of Significant Impact</td>
<td>Significance without Mitigation</td>
<td>Mitigation Measure(s)</td>
<td>Significance after Mitigation</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>--------------------------------</td>
<td>-----------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>Buffers may be subsequently approved for urban development, buffers may be eliminated/converted to urban use once the potential for urban/agricultural land use conflicts is eliminated.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cumulative contribution to conversion of Important Farmland to non-agricultural use</td>
<td>Cumulatively Significant and Unavoidable</td>
<td>Mitigation measure AG-1.</td>
<td>Cumulatively Significant and Unavoidable</td>
</tr>
</tbody>
</table>

**Air Quality**

<table>
<thead>
<tr>
<th>Description of Significant Impact</th>
<th>Significance without Mitigation</th>
<th>Mitigation Measure(s)</th>
<th>Significance after Mitigation</th>
</tr>
</thead>
</table>
| Violation of criteria air pollutant standards – construction phase particulate matter | Potentially Significant | AQ-1. Prior to issuance of grading permits, project developers shall prepare a grading plan subject to review and approval by the City. In the event ground disturbance exceeds 2.2 acres per day for initial site preparation activities that involve extensive earth moving activities (grubbing, excavation, rough grading), and 8.1 acres per day for activities that involve minimal earth moving (e.g. finish grading), the required grading plans shall include the following measures to be implemented as needed to prevent visible dust emissions:  
  a. Water all active construction sites to prevent visible dust emissions. Frequency should be based on the type of operation, soil, and wind exposure;  
  b. Prohibit all grading activities during periods of high wind (over 15 mph);  
  c. Apply chemical soil stabilizers on inactive construction | Less than Significant |
<table>
<thead>
<tr>
<th>Description of Significant Impact</th>
<th>Significance without Mitigation</th>
<th>Mitigation Measure(s)</th>
<th>Significance after Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>areas (disturbed lands within construction projects that are unused for at least four consecutive days); d. Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed area; e. Maintain at least 1’-0” of freeboard in haul trucks; f. Plant tree windbreaks or construct windbreaks on the windward perimeter of construction projects adjacent to open land; g. Cover inactive storage piles; h. Sweep streets if visible soil material is carried out from the construction site; and/or i. Post a publicly-visible sign written in English and Spanish with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The phone number of the air district shall also be visible to ensure compliance with rule 402 (nuisance).</td>
<td>Mitigation measure AQ-1.</td>
<td>Less than Cumulatively Significant</td>
<td></td>
</tr>
<tr>
<td>Cumulative contribution to the existing non-attainment status for particulate matter</td>
<td>Potentially Cumulatively Significant</td>
<td>Mitigation measure AQ-1.</td>
<td>Less than Cumulatively Significant</td>
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<td>Biological Resources</td>
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<td>Loss of Congdon’s Tarplant population</td>
<td>Potentially Significant</td>
<td>BIO-1. To protect Congdon’s tarplant, the presence/absence of Congdon’s tarplant in all annual grassland and ruderal habitats within any Target Area shall be determined during subsequent</td>
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<td>CEQA processes for individual projects. A qualified biologist shall conduct a focused botanical survey for this species in accordance with current California Department of Fish and Wildlife and California Native Plant Society rare plant survey protocols during its peak blooming period (typically August to September). If the survey concludes that the species is not present, then no further mitigation is required. If this species occurs within any of the Target Areas and would be impacted by development, then appropriate mitigation shall be developed and implemented. Mitigation shall include, but not be limited to, project developers contracting with a qualified biologist or native plant specialist to collect seed from the annual Congdon’s tarplant individuals within the impact area prior to initiation of ground disturbance activities. Project developers and the City Community Development Department shall oversee selection of an appropriate mitigation area, preferably within the boundary of the individual project site, or in the vicinity, that would not be disturbed in the future. Collected seed shall be installed at the mitigation area at the optimal time. Topsoil from the occurrence location shall be salvaged (where practical) for use in the mitigation area. A qualified biologist shall develop a project-specific Habitat Management Plan detailing methods for Congdon’s tarplant seed collection from the impact area, preparation of the mitigation area, and seed installation at the mitigation area. In accordance with the</td>
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<td>General Plan, the Habitat Management Plan shall include basic maintenance measures and defined performance standards to manage the rare plant occurrence for its long-term protection and persistence at the mitigation area. Individual developers of projects within the Target Areas will be responsible for implementation of this mitigation measure with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City as part of the CEQA process for individual projects. Implementation of mitigation measure BIO-1 will ensure that potential impacts to special-status Congdon’s tarplant are mitigated to a less-than-significant level by requiring a determination of whether the species is present and if so, requiring implementation of measures to collect seed and replant in a mitigation site. With implementation of this mitigation measure, the proposed project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, this impact is less than significant with mitigation incorporated.</td>
<td>Loss of California red-legged frog and California tiger salamander – Potentially Significant BIO-2. To avoid possible impacts to California red-legged frog and California tiger salamander, the drainages within Target Area V</td>
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<td>development within Target Areas F, K, or V</td>
<td>and the agricultural areas within Target Areas F, K, or V shall be evaluated during the subsequent CEQA process to determine if suitable aquatic breeding and/or upland aestivation habitat is present. If no aquatic breeding or upland aestivation habitat is present, but development within the Target Areas is proposed within areas that could be traversed by wandering frogs or salamanders, initial site clearing and grading shall be conducted and completed only during the dry season, which typically extends from April 15 to November 15. Site clearing and grading shall halt if significant rainfall, defined as greater than 0.5-inch per 24 hours within a local watershed, is either forecasted or observed to avoid environmental conditions when California red-legged frog or California tiger salamander would have the potential to be active. A biologist qualified to assess and monitor California red-legged frog and/or California tiger salamander shall be approved by the City prior to the start of construction activities. The biologist shall conduct preconstruction surveys, training sessions, and construction monitoring and reporting, if needed. Before construction activities begin, the qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of California red-legged frog and California tiger salamander and their habitats, the measures that are being implemented to conserve California red-</td>
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### Description of Significant Impact

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Legged frog and California tiger salamander as they relate to the project (contained herein), and the boundaries within which the project occurs. Informational handouts with photographs clearly illustrating the species' appearances shall be used in the training session. All new construction personnel shall undergo this mandatory environmental awareness training.

The contractor shall avoid the use of monofilament netting including in temporary and permanent erosion control materials (fiber rolls and blankets).

If proposed construction activities may result in the “take” (harass, harm, pursue, wound, kill, trap, or capture) of California red-legged frog or California tiger salamander, the project proponent shall obtain state and federal Incidental Take Permits, and comply with all stipulated conditions to protect special-status amphibians (including, but not limited to those identified above) and compensate for the permanent loss of California tiger salamander and/or California red-legged frog breeding or upland habitat. To compensate for the permanent loss of habitat, the applicant would be required to preserve or purchase in-kind habitat that is known to provide breeding and/or upland habitat for California tiger salamander and/or California red-legged frog. Compensatory mitigation may be accomplished through one of the following options:

- Establishing a conservation easement on or off site in a
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<td>suitable Monterey County location and providing a non-wasting endowment for management and monitoring of the property in perpetuity. Lands placed in a conservation easement must be documented to support California tiger salamander and/or California red-legged frog;</td>
<td>• Depositing funds into an USFWS and CDFW approved in-lieu fee program; or • Purchasing credits in a USFWS and CDFW approved conservation bank that includes the project site in its service area.</td>
<td>The applicants for projects within the subject Target Areas will be responsible for implementing this mitigation measure, with oversight by the Community Development Director. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance.</td>
<td>Implementation of mitigation measure BIO-2 will ensure that potential impacts to federally and/or state-listed amphibian species are reduced by determining whether they are likely to occur within areas proposed for construction, by requiring exclusionary fencing, environmental awareness training, and biological construction monitoring if impacts can be avoided, or obtaining regulatory permits from the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife via the incidental take permitting process, if impacts cannot be avoided. With implementation of this mitigation measure, the proposed project would not substantially</td>
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<tr>
<td>Loss of nesting birds</td>
<td>Potentially Significant</td>
<td>BIO-3. To avoid possible impacts to nesting birds occurring within any of the Target Areas, construction activities should be scheduled to take place outside of the bird nesting season (September 16 through January 31). If construction occurs during the bird nesting season (February 1 through September 15), then a qualified biologist shall conduct a pre-construction survey for nesting birds to ensure that no nests would be disturbed during project construction. This survey shall be conducted no more than seven days prior to the initiation of disturbance activities. If no active nests are present within 250 feet of the locations of planned construction activities, then activities can proceed as scheduled. However, if an active nest is detected during the survey within 250 feet of such activities, a protective construction-free buffer zone from each active nest (typically 250 feet for raptors and 50-100 feet for other species, to be determined by the qualified biologist) will be clearly delineated or fenced until the juvenile bird(s) have fledged (left the nest), unless the biologist determines that construction would not impact active nests. The applicants for projects within the Target Areas will be responsible for implementation of this mitigation measure, with usage of evidence.</td>
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reduce the number or restrict the range of an endangered, rare or threatened species. Therefore, this impact is less than significant with mitigation incorporated.
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<tr>
<td>Loss of western burrowing owl</td>
<td>Potentially Significant</td>
<td>BIO-4. To avoid/minimize potential impacts to burrowing owls occurring within any of the Target Areas, individual project developers will retain a qualified biologist to conduct a two-visit (i.e. morning and evening) presence/absence survey at areas of suitable habitat on and adjacent to the project site no less than 14 days prior to the start of construction. Surveys shall be conducted according to methods described in the <em>Staff Report on Burrowing Owl Mitigation</em> (CDFW 2012). If these pre-construction “take avoidance” surveys performed during the breeding season (February through August) or the non-breeding season (September through January) locate occupied burrows in or near construction areas, consultation with the California Department of Fish and Wildlife would be required to interpret survey results and develop project-specific plan for avoidance, minimization, and compensation. Where there is insufficient habitat on, adjacent to, or near project sites where burrowing owls will be impacted, acquisition of off-site mitigation lands with occupied burrowing owl habitat may be required in consultation with California Department of Fish and Wildlife. Compensation may take the form of (a) acquiring and dedicating lands into conservation easements; (b) purchasing</td>
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<tr>
<td>Loss of Monterey dusky-footed woodrat – development within Target Area V</td>
<td>Potentially Significant</td>
<td>BIO-5. A qualified biologist shall conduct pre-construction surveys for woodrat nests within Target Area V, including a 30-foot buffer around project impact areas. All woodrat nests shall be flagged for avoidance of direct construction impacts and a 10-foot equipment exclusion buffer shall be established around dens that shall not be removed and are in proximity to the construction area. If avoidance of active woodrat nests is not feasible, woodrat nests shall be dismantled by the qualified biologist no more than three days prior to construction. Woodrats shall be evicted from their nests prior to the removal of the nests and onset of any clearing or ground disturbing activities to avoid direct injury or mortality of the woodrats. The nests shall be dismantled and the nesting material and/or food caches moved to a new location outside of the project impact area. Prior to nest deconstruction, each active nest shall be disturbed by the qualified biologist such that all woodrats leave the nest and...</td>
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mitigation credits at compensation ratios that have been approved by the California Department of Fish and Wildlife; or (c) preserving area contiguous or near the acreage lost. The applicants for projects within the Target Areas will be responsible for implementation of this mitigation measure, with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance.
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<td>Loss of special-status species bats</td>
<td>Potentially Significant</td>
<td>BIO-6. Prior to tree removal or structure disturbance activities, individual project developers shall retain a qualified biologist to conduct a focused survey for bats and potential roosting sites in</td>
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seek refuge out of the project impact area. Nests are to be slowly dismantled by hand in order to allow the occupants to disperse. Should young prior to the age of weaning be found in the nest, the nest shall be reconstructed in place and left undisturbed for three weeks or a period of time deemed adequate by the qualified biologist for the young to wean.

All vegetation and duff materials shall be removed from three feet around the nest prior to dismantling so that the occupants do not attempt to rebuild within the project impact area. Nesting materials shall be placed nearby in a location similar to the original location (e.g. the base of a nearby hardwood tree or shrub, near a downed log, or in the open), if such a location is readily available. The spacing between active relocated nests shall not be less than 100 feet, unless the qualified biologist has determined that the habitat can support higher densities of nests, or if the original nests were closer than 100 feet to one another.

The applicants for projects within Target Area V will be responsible for implementation of this mitigation measure, with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance.
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| trees to be removed, in trees within 250 feet of the development footprint, and within and surrounding any structures that may be disturbed by the project. These surveys shall be conducted no more than 15 days prior to the start of construction. The surveys can be conducted by visual identification and assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an “Anabat” unit. If no roosting sites or bats are found, a letter report confirming absence shall be submitted to the City of Salinas and no further mitigation is required. If bats or roosting sites are found, a letter report and supplemental documents shall be provided to the City of Salinas prior to grading permit issuance and the following monitoring, exclusion, and habitat replacement measures shall be implemented: a. If bats are found roosting outside of the nursery season (May 1 through October 1), they shall be evicted as described under (b) below. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined to not be a maternal roost, then the bats shall be
Evicted as described under (b) below. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 250-foot buffer zone (or different size if determined in consultation with the CDFW) shall be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.

b. If a non-breeding bat hibernaculum is found in a tree or snag scheduled for removal or on any structures scheduled to be disturbed by project activities, the individuals will be safely evicted, under the direction of a qualified bat biologist and in consultation with the CDFW. Methods could include: carefully opening the roosting area in a tree or snag by hand to expose the cavity and opening doors/windows on structures, or creating openings in walls to allow light into the structures. Removal of any trees or snags and disturbance of any structures shall be conducted no earlier than the following day (i.e., at least one night will be provided between initial roost eviction disturbance and tree removal/structure disturbance). This action will allow bats to leave during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.

The applicants for projects within the Target Areas will be responsible for implementing this mitigation measure with
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<td>Loss of wetlands and waters of the State/U.S. – development within Target Area V</td>
<td>Potentially Significant</td>
<td>BIO-7. Prior to commencement of construction activities for individual projects within Target Area V, a preliminary jurisdictional wetland assessment will be conducted by a qualified biologist to document the extent of features potentially regulated by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and/or the Regional Water Quality Control Board. If impacts to a federal jurisdictional feature may occur, a Clean Water Act Section 404 Nationwide Permit may be needed. If the proposed activity would not otherwise qualify for a Nationwide Permit, the applicant will proceed with obtaining an Individual Permit from the USACE. For either permit, a wetland delineation report shall first be submitted to the USACE for a jurisdictional determination. If impacts to a wetland not subject to federal jurisdiction but subject to state jurisdiction may occur, fill authorization shall be sought from the Central Coast Regional Water Quality Control Board. For any wetland impacted by individual projects within Target Area V, the project proponent shall take steps necessary to comply</td>
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<td>with City General Plan Policy COS-18, including the minimum ratios set forth therein for impacts to wetlands and other waters. Mitigation shall be sufficient to ensure no net loss of wetland area, function, or value, either through wetland creation, restoration, or the purchase of wetland credits through an approved wetland mitigation bank. A Water Quality Certification (Section 401 of the Clean Water Act) from the Central Coast Regional Water Quality Control Board and Lake or Streambed Alteration Agreement from the California Department of Fish and Wildlife will also be obtained if determined necessary through the wetland assessment and subsequent regulatory agency consultation. Applicants for projects within Target Area V will be responsible for implementing this mitigation measure with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance.</td>
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<td>Loss of Sensitive Natural Communities – development within Target Area V</td>
<td>Potentially Significant</td>
<td>Mitigation measure BIO-7.</td>
<td>Less than Significant</td>
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<td>Cumulative impacts to special-status Congdon’s tarplant, California red-legged frog,</td>
<td>Potentially Cumulatively Significant</td>
<td>Mitigation measures BIO-1 to BIO-8. Mitigation measures BIO-1 to BIO-6 each address individual cumulative impacts to a special-status species. Mitigation measure BIO-7 addresses impacts to</td>
<td>Less than Cumulatively Significant</td>
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<td>California tiger salamander, nesting birds, western burrowing owl, dusky-footed woodrat, and special-status species bats, wetlands/waters, and riparian habitat</td>
<td>wetlands, and mitigation measure BIO-8 addresses impacts to riparian habitat.</td>
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<td><strong>Climate Change</strong></td>
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<td>Generation of significant greenhouse gas emissions</td>
<td>Significant and Unavoidable</td>
<td>GHG-1. Until such time as the City adopts a greenhouse gas reduction plan pursuant to CEQA Guidelines section 15183(5)(b), Plans for the Reduction of Greenhouse Gas Emissions, developers of future individual projects within the Target Areas shall prepare a Greenhouse Gas Reduction Plan (GGRP). The GGRP shall serve as a project specific plan for the reduction of GHGs associated with individual projects. The GGRP shall include the following: 1) A GHG threshold of significance adopted by the City, if any, which is applicable on the date the project application is deemed complete by the City. If none has been adopted by the City, the GGRP shall include a GHG threshold of significance recommended by an appropriate agency such as the air district, or other regional or state agency which is acceptable to the City and applicable on the date the project application is deemed complete by the City. The threshold shall be based on substantial evidence that it is applicable to the proposed project.</td>
<td>Significant and Unavoidable</td>
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<td>2) Calculation of an unmitigated annual project GHG emissions projection using an acceptable modeling tool such as CalEEMod. 3) Calculation of GHG emissions reductions that accrue from applicable building standards and other adopted regulatory requirements in place on the date the project application is deemed complete by the City. These include regulatory requirements such as CALGreen, Pavley standards, Low Carbon Fuel Standard, Advanced Clean Cars, and other future applicable standards or regulatory requirements that may be adopted by the state to implement AB 32 (2020), SB 32 (2030), other state regulations, or future state adopted legislation for reducing GHG emissions, including legislation and implementing regulations designed to achieve post-2030 emissions reduction targets, if any. 4) Calculation of net project GHG emissions volume after reductions are taken for applicable building standards and other adopted regulatory requirements. Determination whether the net emissions volume exceeds or is below the threshold of significance. 5) If the net emissions volume is above the applicable threshold of significance, the GGRP shall include feasible GHG reduction measures to be implemented to reduce total emissions to below the threshold of significance, if feasible. GHG reduction measures that are site-specific and under control of the applicant shall be prioritized. These could include, but may not be limited to, S-26 EMC Planning Group Inc.</td>
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<td>Building and site energy reduction measures, measures to reduce project-generated vehicle miles traveled, or other measures. Off-site measures such as participation in a community-wide GHG reduction program(s), if any are adopted, or payment of GHG reduction fees (carbon offsets) into a qualified existing local program, if one is in place, may be considered after all feasible on-site reduction measures are considered. The effectiveness of the GHG reduction measures included in the GGRP must be verifiable based on evidence presented in the GGRP. Representative GHG reduction measures which may be considered may include, but are not limited to:</td>
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<td>• Measures identified by the California Air Pollution Control Officers' Association in Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures or updates to this document as may occur from time to time.</td>
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<td>• Measures identified in guidance from the air district, if any, and/or in guidance provided by other regional air districts such as the Bay Area Air Quality Management District, Sacramento Metropolitan Air Quality Management District, San Luis Obispo County Air Pollution Control District, or other agencies with adopted GHG reduction guidance that is applicable on the date the project application</td>
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<td>is deemed complete by the City.</td>
<td>• Measures that support implementation of adopted state building guidelines and regulations in place on the date a project application is deemed complete by the City. These could include, but are not limited to: Tier 1 and Tier 2 building energy reduction measures included in CALGreen, provision of on-site vehicle charging stations or related infrastructure that supports state goals for transportation system electrification enumerated in SB 350, etc. If sufficient feasible GHG reduction measures are unavailable to reduce GHG emissions to below the threshold of significance, the applicant shall include evidence in the GGRP to this effect. The GGRP shall be subject to review and approval of the Community Development Department prior to approval of the project specific entitlements. Implementation of mitigation measure GHG-1 shall not be required if the City has a qualified GHG reduction plan in place on the date a future individual project application is deemed complete, the qualified GHG reduction plan reflects the most recent legislatively-adopted GHG reduction targets (e.g., the 2030 target set by SB 32), includes an inventory of projected GHG emissions from development within the Target Areas, and includes GHG reduction measures applicable to development within the Target Areas whose implementation is required as a condition of approval.</td>
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<tr>
<td>Cultural Resources</td>
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<td>Adverse effects on historical resources</td>
<td>Potentially Significant</td>
<td>CR-1. Developers of individual projects within Target Areas shall retain a qualified historic resources consultant to conduct an historic resources inventory and may be required to perform site specific surveys, based on the probability and likelihood of the existence of historical remains, to determine if significant historical resources are present within proposed individual project sites. Guidelines established by the California State Office of Historic Preservation shall be used to record resources. If significant historic resources are present, the project developer shall preserve the significant historic resource or implement mitigation measures identified by the historic resources consultant. Mitigations shall be reviewed and approved by the Community Development Director and mitigations shall be implemented and completed prior to approval of a grading permit, unless otherwise directed by the Community Development Director.</td>
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<tr>
<td>Adverse effects on unique archaeological resources</td>
<td>Potentially Significant</td>
<td>CR-2. During the CEQA review process for individual future projects within the Target Areas, archaeological surveys shall be conducted to determine whether any unique archaeological resources or subsurface historic resources are present. Intensive pedestrian surveys should be conducted, and if possible, during a</td>
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<td>time of the year when ground visibility is optimal (e.g. after plowing of agricultural fields). CR-3. The following language shall be included in any permit associated with earth moving activities for development projects proposed within Target Areas: In the event that unique archaeological resources or historical resources are uncovered during excavation and/or grading, all work shall stop in the area of the subject property until an appropriate data recovery program can be developed and implemented by a qualified archaeologist. The Community Development Director shall ensure that the permit language has been included and shall ensure that the appropriate data recovery program is implemented should unique archaeological resources or historical resources be uncovered.</td>
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<td>Adverse effects on paleontological resources</td>
<td>Potentially Significant</td>
<td>CR-4. The following language shall be included in any permit associated with earth moving activities for development projects proposed within Target Areas: In the event that paleontological resources are uncovered during excavation and/or grading, all work shall stop in the area of the subject property until a qualified paleontologist can assess the scientific significance of the paleontological resources and, if they are significant, until an appropriate data recovery program can be developed and implemented. The Community Development Director shall ensure that the permit language has been included</td>
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and shall ensure that the appropriate data recovery program is implemented if significant paleontological resources are uncovered.

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<tr>
<td>Disturbance of human remains</td>
<td>Potentially Significant</td>
<td>CR-5. If human remains are found during construction within the Target Areas, there shall be no further excavation or disturbance of the construction site or any nearby area reasonably suspected to overlie adjacent human remains until an archeological monitor and the coroner of Monterey County are contacted. If it is determined that the remains are Native American, the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD may then make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and associated grave goods as provided in Public Resources Code section 5097.98. The landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance if: a) the Native American Heritage Commission is unable to identify a MLD or the MLD failed to make a recommendation within 24 hours after being notified by the commission; b) the descendent identified fails to make a</td>
<td>Less than Significant</td>
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EMC Planning Group Inc.
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<td>c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.</td>
<td>HAZ-1. Prior to the issuance of grading permits for development within Target Areas, developers of individual projects shall prepare Phase I Environmental Site Assessments to determine whether agricultural chemical residues are present and could pose a public health or workers. The results of the assessments shall be included in the CEQA documentation for such projects. If hazardous materials conditions are identified that require preparation of Phase II Environmental Site Assessments, future individual project developers shall be responsible for conducting the assessments and for implementing all recommendations and requirements for remediation of hazardous materials conditions identified therein.</td>
<td>Less than Significant</td>
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<tr>
<td>Public or environmental hazards from exposure to aerially deposited lead in soils – development within Target Areas B, F, L2, K, and V</td>
<td>Potentially Significant</td>
<td>HAZ-2. Project proponents within portions of Target Areas located adjacent to U.S. Highway 101 shall retain a qualified expert to provide evidence about the potential presence of aerially deposited lead in Target Areas soils. If evidence suggests the presence of aerially deposited lead, project proponents shall retain a qualified</td>
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<td>expert to conduct soil testing for aerially deposited lead in locations where project grading and excavations may have potential to result in release of this material. The testing scope should include preparation of a site-specific work plan specifying surface sample or soil boring locations, sample collection, laboratory analysis, and preparation of findings, and recommendations. The testing report must determine the concentrations of lead in such locations and whether project grading and excavations have potential to cause worker and public health and safety risks. If risks are possible, a remediation plan shall be prepared and implemented. The remediation plan shall define performance standards for the handling and disposal of contaminated soil to ensure that risks to public health and safety from transport and disposal are minimized. The testing program and remediation plans (as needed) will be completed prior to initiation of ground disturbance activities in locations where the expert has deemed that testing for aerially deposited lead is warranted. If remediation is needed in specific locations, the remediation process will also be completed prior to initiation of project related ground disturbance activities in those locations. HAZ-3. If the aerially deposited lead testing program identified in mitigation measure HAZ-2 identifies the presence of hazardous concentrations of lead in soils to be excavated or graded, project proponents shall prepare and implement a worker health and safety...</td>
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<td>plan and training program. To avoid health effects on construction personnel, all personnel who may come in contact with contaminated soil will be trained in accordance with applicable Occupational Safety and Health Administration standards. A site-specific worker health and safety plan defining potential contaminants and, where appropriate, proper personnel protective equipment will be employed. Worker training will be completed prior to initiation of ground disturbance activities in the area(s) defined in the lead testing program to contain lead concentrations deemed to be potentially hazardous to worker and public safety.</td>
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**Hydrology and Water Quality**

No significant impacts

**Noise**

<p>| Exposure of future development within Target Areas to traffic noise levels in excess of standards | Potentially Significant | N-1. Developers of future individual projects within portions of Target Areas where traffic related noise exposure exceeds 65 dBA for commercial and business park uses and 70 dBA for industrial uses as identified in the City of Salinas General Plan Economic Development Element Draft Noise and Vibration Assessment Salinas, California shall prepare a noise study. Each noise study shall identify traffic noise exposure levels within each individual project site; specify locations within each site where noise levels exceed thresholds; and define site design, building orientation, setbacks, | Less than Significant |</p>
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<td>noise barriers, or other measures needed to ensure noise exposure does not exceed standards at outdoor use areas. Each noise study shall be subject to review and approval of the Community Development Director and project design features needed to reduce outdoor noise exposure to acceptable levels shall be reflected in project development plans prior to approval of a building permit. Where an individual project is proposed within any portion of a Target Area that is not exposed to noise levels that exceed acceptable levels for the proposed land use type as identified in the <em>City of Salinas General Plan Economic Development Element Draft Noise and Vibration Assessment Salinas, California</em>, a noise study is not required.</td>
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<tr>
<td>Exposure of people and structures to excessive groundbourne vibration during construction</td>
<td>Potentially Significant</td>
<td>N-2. Where the construction process for individual projects within the Target Areas include pile driving or other high vibration activities and those activities are planned within 200 feet of existing structures or below ground infrastructure, a qualified engineer shall be retained to prepare a site-specific vibration study. The study shall identify areas of potential vibration impact and measures to be implemented to reduce vibration impacts. Vibration impacts would be considered less than significant where vibration peak particle velocity is below the following standards: 1) 0.5 inches/second for buildings structurally sound and designed to modern engineering standards; 2) 0.3 inches/second for buildings that are found to be structurally sound but where structural damage</td>
<td>Less than Significant</td>
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<td>is a major concern; and 3) a conservative limit of 0.08 inches/second for ancient buildings or buildings that are documented to be structurally weakened. The vibration study shall include the following components:</td>
<td>• Planned locations and description/characterization of vibration compaction activities such as pile driving, assessment of the sensitivity of nearby structures to groundborne vibration, and vibration limits for all vibration-sensitive structures located within 200 feet of the vibration source; • A vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, a vibration monitoring schedule, and a process to conduct photo, elevation, and crack surveys to document before and after construction conditions; • Measures to ensure that when vibration levels approach limits, construction will be suspended and contingencies implemented to either lower vibration levels or secure the affected structures; • A plan for making appropriate repairs or providing compensation where damage has occurred as a result of construction activities; and • Where buildings within 200 feet of the vibration sources are</td>
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### Description of Significant Impact

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<td>inhabited, a public information program to notify affected neighbors of scheduled construction activities and their type and duration, and a construction schedule that assures that activities with the highest potential to produce perceptible vibration are conducted during hours with least potential to adversely affect nearby businesses and residents. The vibration study shall be subject to review and approval by the Public Works Director prior to issuance of a demolition or building permit, whichever comes first.</td>
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<td>Substantial permanent increase in noise levels from traffic generation</td>
<td>Significant and Unavoidable</td>
<td>Implementation of General Plan Implementation Program N-1, which requires noise evaluations for each project-level development proposal, General Plan Policy N-2.1 and Implementation Program N-5, which require noise impacts to be reduced through incorporation of noise control measures such as earthen berms, landscaped walls, sound wall, lowered streets, etc.</td>
<td>Significant and Unavoidable</td>
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<tr>
<td>Temporary construction noise in excess of standards</td>
<td>Potentially Significant</td>
<td>N-3. The City shall review applications for each future individual project within the Target Areas to determine whether the construction period will exceed one year. For all projects with a construction period exceeding one year, each project applicant shall prepare a construction noise assessment. The construction noise assessment shall identify: 1) the types and noise intensities of construction equipment to be utilized; 2) the locations of noise-sensitive uses (e.g. residential, schools, etc.) and non-sensitive uses</td>
<td>Less than Significant</td>
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<td>(e.g. commercial and industrial uses) that would be exposed to construction noise, the projected construction noise levels at these uses, and whether construction noise levels may exceed both 60 dBA Leq and ambient noise levels by at least 5 dBA Leq at noise-sensitive uses, or 70 dBA Leq and ambient noise levels by at least 5 dBA Leq at non-sensitive uses. Where either condition occurs, project applicants shall identify and implement construction noise reduction measures that ensure construction noise does not exceed these noise levels. The construction noise reduction measures shall include the measures listed below unless the construction noise assessment includes data which demonstrates to the City that allowable construction noise levels can be met with fewer and/or substitute noise reduction measures. However, for all projects, the limits on construction hours and days as listed below shall apply.</td>
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<td>• Restrict noise-generating activities at construction sites or in areas adjacent to construction sites to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday. Construction shall be prohibited on Saturdays, Sundays and holidays unless prior written approval is granted by the Public Works Director;</td>
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<td>• Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment to provide a minimum of 5 dBA noise reduction;</td>
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<td>• Equip all internal combustion engine-driven equipment with</td>
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<td>intake and exhaust mufflers that are in good condition and appropriate for the equipment;</td>
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<td>• Prohibit unnecessary idling of internal combustion engines; • Locate stationary noise-generating equipment such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, install adequate muffing/enclosures; • Utilize &quot;quiet&quot; air compressors and other stationary noise sources where possible; • Locate construction staging areas, material stockpiles, and maintenance/equipment and parking areas as far as feasible from residential receptors; • Route all construction traffic via designated truck routes where possible. Prohibit construction related heavy truck traffic in residential areas where feasible; and • Designate a &quot;disturbance coordinator&quot; responsible for responding to complaints about construction noise and for defining reasonable measures to correct complaint issues. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it a notice to be sent to adjacent property owners. The construction noise assessment and construction noise reduction measures shall be subject to review and approval of the</td>
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<tr>
<td>Cumulative contribution to permanent increase in noise levels from traffic generation</td>
<td>Cumulatively Significant</td>
<td>Implementation of General Plan Implementation Program N-1, which requires noise evaluations for each project-level development proposal, General Plan Policy N-2.1 and Implementation Program N-5, which require noise impacts to be reduced through incorporation of noise control measures such as earthen berms, landscaped walls, sound wall, lowered streets, etc.</td>
<td>Cumulatively Significant and Unavoidable</td>
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**Police and Fire Services**

No significant impacts

**Transportation**

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<td>Reduce level of service on seven City road segments to below acceptable LOS D</td>
<td>Significant</td>
<td>TRANS-1. Required improvements to the segment of Bernal Drive between N. Main Street and Sherwood Drive/Natividad Road are included in the City’s TFO (Project 33B). The improvements would assure that operations of the road segment are improved to LOS D or better. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City's TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment. TRANS-2. Required improvements to the segment of Russell Road</td>
<td>Less than Significant</td>
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between Van Buren Avenue and San Juan Grade Road are included in the City’s TFO (Project 12). The improvements identified in the TFO would assure that operations of the road segment are improved to LOS D or better. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City’s TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.

TRANS-3. Required improvements to the segment of Old Stage Road between Natividad Road and the Russell Road Extension are included in the City’s TFO (Project 8). The improvements identified in the TFO would assure that operations of the road segment are improved to LOS D or better. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City’s TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.

TRANS-4. Required improvements to the segment of San Juan Grade Road between Boronda Road and Van Buren Avenue are included in the City’s TFO (Project 13). The improvements identified in the TFO would assure that operations of the road segment are improved to LOS D or better. Prior to issuance of
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<td>building permits for individual projects within the Target Areas, individual project developers shall pay the City’s TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment. TRANS-5. The City will add the required improvements to the segment of E. Harris Road west of Abbott Street that is controlled by the City to the City’s TFO. The improvements include widening the road from two to four 4 lanes. Right-of-way must be acquired for this purpose. The improvements would improve operations to LOS D. The TFO will be updated to include this improvement project prior to approval of any individual development proposed within any of the Target Areas. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City’s TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment. TRANS-6. The City will add the required improvements to the segment of Natividad Road between East Bernal Drive and East Laurel Drive to the City’s TFO. The improvements include widening the road from four to six lanes. Right-of-way must be acquired for this purpose. The improvements would improve operations to LOS D. The TFO will be updated to include this...</td>
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<td>improvement project prior to approval of any individual development proposed within any of the Target Areas. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City’s TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment. TRANS-7. The City will add the required improvements to the segment of West Laurel Drive between U.S. Highway 101 and Adams Street to the City’s TFO. The improvements include widening the road from four to six lanes in total. Right-of-way must be acquired for this purpose. The improvements would improve operations to LOS C. The TFO will be updated to include this improvement project prior to approval of any individual development proposed within any of the Target Areas. Payment of the TFO fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City’s TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.</td>
<td>Mitigation would consist of payment of fair-share fees through a program designed to fund improvements to the impacted road</td>
<td>Significant and Unavoidable</td>
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<tr>
<td>Reduce level of service on five County and one Caltrans Road</td>
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## SUMMARY

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<td>segments to below LOS D</td>
<td>Unavoidable</td>
<td>segments that mitigate the impacts. Mitigation programs exist for mitigating impacts on County controlled or Caltrans controlled road segments.</td>
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<tr>
<td>Reduce level of service on four Caltrans U.S. Highway 101 road segments to below LOS D</td>
<td>Significant</td>
<td>As a condition of approval for future projects proposed within the Target Areas, require payment of the TAMC Regional Fee to mitigate contribution of Target Area development to impacts on U.S. Highway 101 segments.</td>
<td>Less than Significant</td>
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**Wastewater**

No significant impacts

**Water Supply**

No significant impacts
1.0 INTRODUCTION

1.1 REPORT AUTHORIZATION

Determination to Prepare an Environmental Impact Report

The City of Salinas (City) is proposing a general plan amendment needed to formally adopt a new element to the *City of Salinas General Plan* (Cotton Bridges 2002) (hereinafter “General Plan”). The new element, the draft *City of Salinas Economic Development Element* (City of Salinas 2014) (hereafter “EDE” or “proposed project”) was accepted, but not adopted, by the City of Salinas City Council in June 2014. The EDE reflects the City’s recognition of the desirability of adding to its General Plan a comprehensive policy framework that focuses and directs the City’s economic development activities. If adopted in total after the completion of environmental review, the EDE would guide future decisions of the City Council and the community in all aspects of City policy related to economic development. The City’s primary interest is to raise economic development priorities to a legislative, General Plan policy level, and by doing so, ensure that economic development is considered in all City Council planning and decision making actions.

More details regarding the contents of the EDE are set forth in Section 2.0, Project Description. Prior to considering the general plan amendment, the City, acting as Lead Agency, determined that the implementation of the policies contained in the EDE may result in significant adverse environmental effects as defined by the California Environmental Quality Act (CEQA) Guidelines section 15382. Therefore, the City required that an environmental impact report (EIR) be prepared to evaluate and disclose the potential environmental impacts.
1.0 Introduction

**Preparation Standards and Methods**

This EIR has been prepared by EMC Planning Group, under contract to the City of Salinas, in accordance with CEQA and its implementing guidelines. City staff has carefully reviewed the document, and its input is reflected herein; the EIR therefore represents the City’s independent judgment. The City has the discretionary authority to review and approve the proposed project. Roles and responsibilities of a Lead Agency are described in CEQA Guidelines sections 151050 and 15367. This EIR is an informational document that is intended to inform the City decision makers, its constituents, and responsible and trustee agencies, of the environmental impacts of the proposed project and to identify feasible mitigation measures that would avoid or reduce the severity of those impacts found to be significant. The Salinas City Council will consider the information contained in this EIR prior to taking any discretionary action to approve the proposed project.

This EIR has been prepared using available information from private and public sources noted herein, as well as information generated through field investigation by EMC Planning Group and other technical consultants.

Under CEQA, the purpose of an EIR is to identify a project’s significant environmental effects, to identify alternatives to the proposed project, and to indicate the manner in which those significant effects can be mitigated or avoided. The contents of this EIR are intended to serve this purpose. The primary contents include: description and discussion of the existing environmental setting; characteristics of the proposed project; environmental impacts associated with the proposed project; potentially feasible mitigation measures that can be implemented to reduce or avoid identified adverse environmental impacts; cumulative impacts; and potentially feasible alternatives to the proposed project that would meet most of the basic project objectives while reducing or avoiding one or more of the significant impacts of the proposed project.

An EIR is an objective public disclosure document that takes no position on the merits of the proposed project. Therefore, the findings of this EIR do not advocate a position for or against the proposed project. Instead, the EIR provides information on which decisions about the proposed project can be based. This EIR has been prepared according to professional standards and in conformance with legal requirements.

1.2 Type of EIR

The proposed project is described in Section 2.0, Project Description. The EDE includes policies that would result in expansion of the City’s existing land supply and that could result in intensification of development within existing developed areas of the City. If the City Council adopts the EDE as a general plan amendment, implementation of EDE policies could facilitate
future proposals for a series of land development and public facilities/infrastructure projects over time. Applications for individual, specific development projects designed to implement the EDE have not been submitted, nor would potentially be submitted until after the City approves the EDE.

“First Tier” Program EIR and CEQA Streamlining

This EIR has been prepared as a program EIR pursuant to CEQA Guidelines section 15168. A program EIR is an appropriate type of EIR for projects that consist of a series of actions that can be characterized as one large project, geographically related, and logical parts in the chain of contemplated actions in connection with issuance of rules, regulations or plans. A program EIR allows for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on separate individual actions and ensures consideration of cumulative impacts that might not be captured in the analysis of series of individual projects.

This program EIR also qualifies as a “first tier” EIR from which later, individual projects consistent with the EIR can be “tiered.” The preparation of first tier EIRs is governed by CEQA Guidelines section 15152. “In practice the first ‘tier’ may consist of a … program EIR, which discusses agency-wide programs, policies and cumulative impacts.” (Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29, 36.) Tiering refers to the coverage of general matters in broader EIRs (such as a program EIR) with subsequent narrower EIRs or site-specific EIRs, incorporating by reference the information contained in the broader EIR and focusing only on issues specific to the latter project for which the EIR is being prepared. Narrower negative declarations and mitigated negative declarations can also be tiered from a program EIR. (CEQA Guidelines, § 15385.)

Functioning as both a program EIR and a first tier EIR, this EIR provides an “umbrella” analysis of the environmental effects of development that could be made possible with implementation of the policies contained in the EDE. Future individual development projects proposed to implement the EDE (the series of related actions) will be reviewed to determine if and how CEQA documentation for each can be streamlined by using the environmental analysis contained in this first tier program EIR. The processes by which the City will be able to streamline future decisions under the EDE are identified in both section 15168 and section 15152.

Pursuant to CEQA Guidelines section 15168, subdivision (c), the City may determine, after conducting a written analysis, that a proposed site-specific activity consistent with the EDE is “within the scope of the project covered by the program EIR.” Upon making such a determination, the City would conclude that no additional site-specific negative declaration or EIR is necessary, absent grounds for preparing a subsequent or supplemental EIR. Among the
factors the City will consider in determining whether proposed activities are, indeed, “within the scope” of the project analyzed in the program EIR are: i) the amount of site-specific information that was available for the affected area at the time of program EIR certification and approval of the EDE; and ii) whether the development patterns proposed in connection with the activities are consistent with what was assumed in the program EIR. (See *Citizens for Responsible Equitable Environmental Development v. City of San Diego Redevelopment Agency* (2005) 134 Cal. App. 4th 598, 613-617 [lead agency properly determined that a proposed hotel project was within the scope of a prior program EIR, as the hotel was consistent with the land use and intensity assumed in the program EIR].)

Where the City cannot find the proposed activity to be “within the scope of the project covered by the program EIR,” the City will have to prepare an initial study leading either to a negative declaration (ND), a mitigated negative declaration (MND), or an EIR for the proposed activity. A site-specific EIR will be required where the proposed project or activity may cause a significant environmental effect not considered previously. (CEQA Guidelines, § 15168, subd. (d).)

Regardless of whether a later activity is found to be within the scope of this EIR and program (the EDE) or whether a new site-specific EIR, ND, or MND is required, the City must incorporate into the later activity all applicable feasible mitigation measures developed in this EIR and approved by the City Council at the time of certifying this EIR and approving the EDE. (*Id.*, subd. (c)(3).)

Future site-specific approvals may also be narrowed pursuant to the rules for tiering set forth in section 15152. That section provides, for example, that, where a first tier EIR has “adequately addressed” particular significant effects, including cumulative impacts, such impacts need not be revisited in second- and/or third-tier documents. Under subdivision (f)(3) of section 15152, a lead agency considering a lower tier action may determine that previously-identified significant environmental effects have been “adequately addressed” if the lead agency determines that:

(A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or

(B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

Second- and third-tier documents may limit the examination of effects to those that “were not examined as significant effects” in the prior EIR or “[a]re susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, the imposition of conditions, or other
means.” (CEQA Guidelines, § 15152, subd. (d).) Such lower-tier projects will only qualify for tiering under section 15152; however, if, at the time they are proposed, they are consistent with the operative general plan and zoning designations (though tiering may be allowed where the need for a rezone is solely for the purpose of achieving consistency with an existing general plan designation). (Pub. Resources Code, § 15152, subd. (e).)

Streamlining under sections 15168 and 15152 will help to avoid repetition and may reduce the time and costs associated with preparing EIRs, negative declarations, or mitigated negative declarations on more narrowly-defined projects, such as future individual projects proposed.

1.3 EIR Process and Public Input Opportunities

CEQA’s primary function is to ensure that the environmental impacts of a proposed project, mitigation measures proposed to avoid or lessen expected impacts, and alternatives to the proposed project are adequately evaluated and disclosed. An EIR must evaluate a reasonable range of potentially feasible alternatives to the proposed project, or to the location of the proposed project that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives as described in CEQA Guidelines section 15126.6. CEQA also requires that the public along with public agencies with an interest in or with approval authority over specific elements of a proposed project be afforded the opportunity to provide input as to the scope and content of the EIR and to comment on the analysis included in the EIR. These CEQA functions are implemented through several fundamental steps in the EIR preparation, review, and consideration/certification process, each of which is briefly outlined below.

Notice of Preparation (NOP) and Scoping

CEQA Guidelines section 15082 describes the purpose, content and process for preparing, circulating and facilitating early public and public agency input on the scope of an EIR. CEQA Guidelines section 15375 defines an NOP as:

…a brief notice sent by the Lead Agency to notify the Responsible Agencies, Trustee Agencies, the Office of Planning and Research, and involved federal agencies that the Lead Agency plans to prepare an EIR for the project. The purpose of the notice is to solicit guidance from those agencies as to the scope and content of the environmental information to be included in the EIR.
A NOP was prepared for the proposed project and circulated for 30 days from November 9, 2015 to December 10, 2015. Written responses to the NOP were received from the following interests/agencies:

- LandWatch Monterey County (November 30, 2015);
- Ag Land Trust of Monterey County (December 7, 2015);
- Building Healthy Communities – East Salinas Land Use Action Team (December 7, 2015);
- Monterey County Local Agency Formation Commission (December 7, 2015); and
- Monterey County Resource Management Agency (December 11, 2015).

The City received the following letter after the end of the 30 day comment period.

- Monterey County Resource Management Agency (December 22, 2016).

As part of the early consultation process and pursuant to CEQA Guidelines section 15083 regarding early public consultation, a scoping meeting was held at the City of Salinas Rotunda (City Council chamber) on November 23, 2015 at 6:00 PM. Representatives from the Transportation Agency for Monterey County, State Senator Anthony Canella’s office, Building Healthy Communities, the Salinas Urban Arts Collaborative, and All Safe Systems attended the meeting. No specific comments were made about the scope of issues to be addressed in the EIR. Questions and comments were primarily focused on the project description and the project consideration process.

The NOP and responses to it are contained in Appendix A, which is included on the CD located on the inside back cover of this EIR.

**Draft EIR**

A draft EIR must be prepared and circulated for public review for at least 30 days and at least 45 days where the document must go to the State Clearinghouse for distribution to state responsible agencies and/or trustee agencies. (See Pub. Resources Code, § 21091, subd. (a).) This Draft EIR will be circulated for 45 days.

**Final EIR, Public Hearings and Public Input, and Certification of the Final EIR**

Upon receipt of written public comments on the draft EIR received during the 45-day public review period, a final EIR will be prepared. The final EIR will contain all comments received, the City’s responses to those comments, and any changes to the draft EIR that may be necessary in response to those comments. As a last step in the CEQA process, the City will conduct public
hearings at which it considers the adequacy of the final EIR. These hearings provide additional opportunity for the public to provide input on the adequacy of the EIR. If the City Council then finds the final EIR to be legally adequate, the City Council will take action to certify the EIR. The final EIR must be certified before the City can consider approval of the proposed project.

1.4 EIR CONTENT AND FORMAT

CEQA Guidelines, section 15120(c) describes the required content of an EIR. This EIR is organized to ensure that all content requirements are met. This EIR is organized as follows:

- **Summary**: provides a summary of the proposed project, significant environmental impacts and associated mitigation measures, alternatives to the proposed project, areas of controversy known to the lead agency, and issues to be resolved, including the choice among alternatives.

- **Section 1.0 – Introduction**: provides basic information on EIRs, CEQA, and the determination to prepare an EIR.

- **Section 2.0 – Project Description**: provides information on the general environmental setting for the proposed project (with environmental topic-specific setting information included in Section 3.0), and a description of the proposed project including proposed physical development.

- **Section 3.0 – Environmental Setting, Impacts and Mitigation Measures**: presents the environmental and regulatory setting (local, state, and federal regulations) applicable to each environmental issue area, analysis of the environmental impacts of the proposed project, and mitigation measures to avoid or reduce environmental effects.

- **Section 4.0 – Cumulative Impacts**: describes the cumulative impacts of the proposed project when its incremental effects are considered in combination with past, present, and future projected development.

- **Section 5.0 – Other CEQA Topics**: includes a summary of significant unavoidable impacts, growth-inducing impacts, irreversible effects, energy demand and conservation, and economic/urban decay effects.

- **Section 6.0 – Alternatives**: includes discussion of alternatives to the proposed project that avoid or lessen one or more of the significant environmental impacts.

- **Section 7.0 – References and Report Preparers**: includes references uses in the EIR, organizations and persons contacted, and report preparers.
Appendices: contains technical reports and other project analysis used as evidence to support analysis of project impacts and mitigation measures. The technical appendices are found on CD on the inside back cover of the EIR.

1.5 Impact Terminology, Mitigation Measure Approach, and Acronyms Used in this EIR

Characterization of Impacts

This EIR uses the following terminology to denote the significance of environmental impacts:

- “No impact” means that no change from existing conditions is expected to occur;
- A “less than significant impact” would cause no substantial adverse change in the physical environment, and no mitigation is recommended;
- A “significant impact” or “potentially significant impact” would, or would potentially, cause a substantial adverse change in the physical environment, and mitigation is required; and
- A “significant and unavoidable impact” would cause a substantial change in the physical environment and cannot be avoided if the project is implemented; mitigation may be recommended, but would not reduce the impact to less than significant.

Approach for Mitigation of Significant Environmental Impacts

Mitigation of significant impacts can be achieved through several approaches. First, required conformance of new development projects with existing local, regional, state, or federal policies, standards, or regulations that uniformly apply to new development projects may avoid or reduce potentially significant impacts to less than significant. Individual environmental topics are addressed in separate sections of this EIR. Each individual topic section includes a Regulatory Setting subsection. Each Regulatory Setting subsection includes a summary of policies, standards, and regulations that are pertinent to the environmental topic. A brief explanation of how one or more policies, standards, or regulations function to reduce environmental impacts is provided in the Analysis, Impacts, and Mitigation subsection of each topic section.

While, local, regional, state, or federal policies, standards, or regulations that uniformly apply to new development projects are independent of the CEQA process, and would apply to proposed development even in the absence of the CEQA process, the City, as lead agency, is responsible
for working with federal, state and local agencies to ensure the compliance and conformance of future development with all policy and regulatory requirements intended to reduce environmental impacts.

Mitigation measures are included in this EIR when applicable policies, standards, or regulations do not address or are insufficient to reduce an environmental impact to less than significant. Mitigation measures are designed to close gaps between the level of impact reduction afforded by policies, standards, or regulations, if any, and the level of impact reduction needed to avoid or reduce environmental impacts to less than significant. In some cases, feasible mitigation measures may not be available to avoid or reduce a significant impact to less than significant. In this case, an impact may be defined as significant and unavoidable.

This EIR identifies mitigation measures and may identify other mechanisms such as conditions of approval and/or required consistency with policies, standards, and/or regulations that serve to reduce the environmental effects associated with the proposed project. As described in CEQA Guidelines section 15126.4(2), mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design. The City of Salinas will ensure the enforceability and implementation of mitigation measures and the consistency of proposed development with policies, standards, regulations and/or conditions of approval associated with future proposed Economic Development Element through its development review processes. Lead agencies have another option for how to formulate mitigation measures where the “proposed project” is “the adoption of a plan, policy, [or] regulation.” In such instances, mitigation measures may be directly incorporated into the plan, policy, or regulation. (Pub. Resources Code, § 21081.6, subd. (b).) Thus, a proposed mitigation measure for a proposed General Plan can be turned into a General Plan policy that, when applied to future projects, will mitigate impacts of such future projects. Mitigation measures in this EIR will be included in a mitigation monitoring and reporting program (MMRP) required pursuant to CEQA Guidelines section 15097. The City will adopt the MMRP as an appendix to the EDE to ensure the compliance and conformance of future development with the MMRP and the mitigation of environmental impacts.

**List of Acronyms**

Numerous acronyms are used in this EIR. The following list is provided as a quick reference to assist readers.

- **AB** Assembly Bill
- **ACC** Advanced clean cars
1.0 Introduction

ADA    Americans with Disabilities Act
ADE    Applied Development Economics
AF     Acre-feet
AFY    Acre-feet per year
ALP    Agricultural Land Preservation Program
AMBAG  Association of Monterey Bay Area Governments
BMPs   Best Management Practices
CalEEMod California Emissions Estimator Model
CAPCOA California Air Pollution Control Officers Association
CARB   California Air Resources Board
CDFW   California Department of Fish and Wildlife
CESA   California Endangered Species Act
CEQA   California Environmental Quality Act
CIFP   Capital Improvement and Financing Plans
CMP    Congestion Management Program
CNDDBB California Natural Diversity Database
CNPS   California Native Plant Society
CRHR   California Register of Historic Places
CRLF   California Red-legged Frog
CTS    California Tiger Salamander
CUPA   Certified Unified Program Agencies
DTSC   Department of Toxic Substances Control
EDE    Economic Development Element
EIR    Environmental Impact Report
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
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<tbody>
<tr>
<td>EMFAC</td>
<td>Emission Factors</td>
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<td>EMS</td>
<td>Emergency Medical Services</td>
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<td>EOA</td>
<td>Economic Opportunity Areas</td>
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<tr>
<td>EPA</td>
<td>United States Environmental Protection Agency</td>
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<tr>
<td>EPS</td>
<td>Economic and Planning Systems</td>
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<tr>
<td>ESA</td>
<td>Endangered Species Act</td>
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<td>FAR</td>
<td>Floor Area Ratio</td>
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<td>FEMA</td>
<td>Federal Emergency Management Agency</td>
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<td>FGA</td>
<td>Future Growth Area</td>
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<tr>
<td>FIRMS</td>
<td>Flood Insurance Rate Map</td>
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<tr>
<td>FMMP</td>
<td>Farmland Mapping and Monitoring Program</td>
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<tr>
<td>FORA</td>
<td>Fort Ord Reuse Authority</td>
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<tr>
<td>GCC</td>
<td>Global climate change</td>
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<tr>
<td>GGRP</td>
<td>Greenhouse Gas Reduction Plan</td>
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<tr>
<td>GHG</td>
<td>Greenhouse gas emissions</td>
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<tr>
<td>GPCPD</td>
<td>Gallons per capita per day</td>
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<tr>
<td>GP FEIR</td>
<td>City of Salinas General Plan Final Environmental Impact Report</td>
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<tr>
<td>GP SEIR</td>
<td>Final Supplement for the City of Salinas General Plan Final Program Environmental Impact Report</td>
</tr>
<tr>
<td>GSA MOU</td>
<td>Greater Salinas Area Memorandum of Understanding</td>
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<tr>
<td>GWP</td>
<td>Global warming potential</td>
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<td>GWR</td>
<td>Groundwater Replenishment Project</td>
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<tr>
<td>HazMat</td>
<td>Hazardous Materials</td>
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<td>LAFCO</td>
<td>Local Agency Formation Commission</td>
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<td>LCFS</td>
<td>Low-Carbon Fuel Standard</td>
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<tr>
<td>Abbreviation</td>
<td>Full Form</td>
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<tr>
<td>LEED</td>
<td>Leadership in Energy and Environmental Design</td>
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<td>LID</td>
<td>Low Impact Development</td>
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<tr>
<td>LOS</td>
<td>Level of service</td>
</tr>
<tr>
<td>LUST</td>
<td>Leaking underground storage tank</td>
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<tr>
<td>MBTA</td>
<td>Migratory Bird Treaty Act</td>
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<tr>
<td>MCWRA</td>
<td>Monterey County Water Resources Agency</td>
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<tr>
<td>MEP</td>
<td>Maximum Extent Practicable</td>
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<tr>
<td>MGD</td>
<td>Million gallons per day</td>
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<tr>
<td>MLD</td>
<td>Most likely descendent</td>
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<tr>
<td>MMT</td>
<td>Million metric tons</td>
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<tr>
<td>MOU</td>
<td>Memorandum of Understanding</td>
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<tr>
<td>MPO</td>
<td>Metropolitan planning organization</td>
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<tr>
<td>MST</td>
<td>Monterey-Salinas Transit</td>
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<tr>
<td>MT</td>
<td>Metric tons</td>
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<tr>
<td>MTP/SCS</td>
<td>Metropolitan Transportation Plan/Sustainable Communities Strategy</td>
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<tr>
<td>MWh</td>
<td>Megawatt hours</td>
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<tr>
<td>NPDES</td>
<td>National Pollutant Discharge Elimination System</td>
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<tr>
<td>NWP</td>
<td>Nationwide Permit</td>
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<tr>
<td>OCEN</td>
<td>Ohlone/Costanoan-Esselen Nation</td>
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<tr>
<td>PCBMPs</td>
<td>Post-Construction Best Management Practices</td>
</tr>
<tr>
<td>PG&amp;E</td>
<td>Pacific Gas and Electric Company</td>
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<tr>
<td>RoadMod</td>
<td>Road Construction Emissions Model</td>
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<tr>
<td>RPS</td>
<td>California Renewable Portfolio Standard Program</td>
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<tr>
<td>RTP</td>
<td>Regional Transportation Plan</td>
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<tr>
<td>Acronym</td>
<td>Full Form</td>
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<tr>
<td>RWQCB</td>
<td>Regional Water Quality Control Board</td>
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<tr>
<td>SITC</td>
<td>Salinas Intermodal Transportation Center</td>
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<tr>
<td>SB</td>
<td>Senate Bill</td>
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<tr>
<td>SCM</td>
<td>Source Control Measures</td>
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<tr>
<td>SCS</td>
<td>Sustainable Communities Strategy</td>
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<tr>
<td>SGMA</td>
<td>Sustainable Groundwater Management Act</td>
</tr>
<tr>
<td>SOI</td>
<td>Sphere of Influence</td>
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<tr>
<td>SR</td>
<td>California State Route</td>
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<td>SVGB</td>
<td>Salinas Valley Groundwater Basin</td>
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<tr>
<td>SWDS</td>
<td>Stormwater Development Standards</td>
</tr>
<tr>
<td>SWMP</td>
<td>Storm Water Management Plan</td>
</tr>
<tr>
<td>SWPPP</td>
<td>Storm Water Pollution Prevention Program</td>
</tr>
<tr>
<td>SWRCB</td>
<td>State Water Resources Control Board</td>
</tr>
<tr>
<td>TAMC</td>
<td>Transportation Agency for Monterey County</td>
</tr>
<tr>
<td>TFO</td>
<td>Traffic Fee Ordinance</td>
</tr>
<tr>
<td>TIA</td>
<td>Transportation Impact Analysis</td>
</tr>
<tr>
<td>TIF</td>
<td>Traffic Impact Fee</td>
</tr>
<tr>
<td>TIP</td>
<td>Traffic Improvement Program</td>
</tr>
<tr>
<td>TND</td>
<td>Traditional Neighborhood Development</td>
</tr>
<tr>
<td>USACE</td>
<td>United States Army Corps of Engineers</td>
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<tr>
<td>USFWS</td>
<td>United States Fish and Wildlife Service</td>
</tr>
<tr>
<td>USGS</td>
<td>United States Geological Survey</td>
</tr>
<tr>
<td>UWMP</td>
<td>Urban Water Master Plan</td>
</tr>
<tr>
<td>VMT</td>
<td>Vehicle miles traveled</td>
</tr>
</tbody>
</table>
1.0 Introduction

WASP WSA  West Areas Specific Plan Water Supply Assessment
WPT Western pond turtle
WSA William Self Associates, Inc.
2.0
PROJECT DESCRIPTION

2.1 OVERVIEW

The proposed project includes the adoption of a proposed new element of the General Plan: the Economic Development Element (EDE). Its purpose is to provide policy-based guidance for economic development designed to promote the long-term future prosperity of the City. The EDE establishes a vision to guide the City as it prepares future General Plan updates. The EDE includes a wide spectrum of economic development programs, projects, policies and implementation actions. EDE policies and actions have potential to affect conditions within the existing city limits, within and outside portions of the City’s existing Sphere of Influence (SOI).

The EDE reemphasizes the General Plan’s land use strategy of prioritizing infill development and revitalization within the city limits and SOI. However, the EDE also provides for new land supply in order to support the 45,500 new jobs needed through buildout of the existing General Plan. These areas of new land supply are termed “Target Areas” and were derived from the long-term Economic Opportunity Areas (EOA) identified through the EDE development process and subsequent preparation of the EIR. One Target Area known as EOA V - Carr Lake is comprised of two non-contiguous land segments and located within the SOI. The remaining Target Areas are located outside of the SOI.

Section 2.3 describes the land use setting for those areas within the SOI, including the Target Area for Carr Lake and five (5) Target Areas outside the SOI. Section 2.4.3 - Land Use Pattern and Potential for Change more exactly defines the land designations in the EDE and includes the following Subsections: EOA within City Limits (except Carr Lake), EOA V - Carr Lake, EOA within SOI, EOA outside SOI, Target Area within SOI (Carr Lake), Target Areas outside SOI, and Economic Development Reserve Areas.
2.2 **LEAD AGENCY**

The City of Salinas is both the project proponent and lead agency for the proposed Economic Development Element. The City’s Community Development Department located at 65 W. Alisal, 2nd Floor, Salinas, CA 93901. The City was responsible for the project management for this effort and coordination of the lead consultant, EMC Planning Group Inc. in the preparation of the EIR.

2.3 **PROJECT LOCATION**

*Project Location and Planning Boundaries*

As described in the *City of Salinas General Plan Final Environmental Impact Report* (Cotton Bridges 2002) (hereinafter “General Plan EIR”), the City of Salinas is located in northern Monterey County between the Gabilan and Santa Lucia mountain ranges. Located at the northern end of the Salinas Valley, Salinas is situated approximately 20 miles northeast of the City of Monterey, 60 miles south of San Jose, 101 miles south of San Francisco and 325 miles north of Los Angeles. The Salinas Municipal Airport, a general aviation facility, is located in the southeastern portion of the City. The City is located in proximity to regional transportation routes including U.S. Highway 101, State Route 68 and State Route 183, and the Union Pacific Railroad line, which traverse the City. Unincorporated land under the jurisdiction of the County of Monterey surrounds the City. Land uses in the areas surrounding the City include land in agricultural production, open space, commercial, and very low density rural development.

As mentioned in Section 2.1 above, EDE policies and actions have potential to affect conditions within the existing city limits, within portions of the City’s existing SOI. A SOI represents the probable physical boundaries and service areas of a city or district. The EDE also includes direction for potential future economic development within areas located adjacent to, but outside the existing SOI that are within unincorporated Monterey County. These areas, as well as specific areas within the SOI for which economic development guidance is provided in the EDE, are referred to as Economic Opportunity Areas (EOA). *Figure 1, Project Location, shows the City’s regional location, the existing city limits, and the SOI boundary. The function, size, and locations of individual EOAs relative to the city limits and SOI are described in further detail in Section 2.4.3, Land Use Pattern and Potential for Change.*
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**Existing Conditions**

*Figure 2, Aerial Photograph – Existing Conditions,* shows existing conditions within the city limits, SOI, and Target Areas located outside the SOI described later in this section. Figure 2 illustrates that with notable exceptions, land within the city limit is largely built out with urban uses. Land outside the city limit but within the SOI remains largely undeveloped and largely in agricultural use. Land within the Target Areas located outside the SOI boundary remains in agricultural use.

More detailed information about land use, resources, and built environmental conditions is provided in Chapter 3.0, Environmental Setting, Impacts, and Mitigation Measures for each environmental topic addressed therein.

**Environmental Setting**

The environmental effects of the proposed EDE are almost entirely related to the future physical consequences of amending the General Plan for new potent development to include the Carr Lake Target Area (two non-contiguous land segments) within the city limit and SOI and five (5) Target Areas which are contiguous to, but outside the existing SOI. A brief review of land use conditions both within and outside of the SOI provides context for understanding the land use relationship between the EDE and the existing General Plan.

The City’s land use setting is illustrated and described in the General Plan EIR as of 2002 when the General Plan EIR was certified. The planning area described in the General Plan was defined by the SOI boundary as planned in the General Plan. While this information is somewhat dated, given the economic downturn that occurred from 2007 and 2011 and its lingering effects that have lasted several years longer, land use conditions today remain substantially similar to those described in the General Plan in 2002, with the exception of several notable land use actions taken by the City and approval of a number of small infill projects.

**Land Use Setting Within Sphere of Influence**

Approximately 4,200 acres (31 percent) of land within the city limits and SOI is developed with residential uses including single-family homes, condominiums, apartments, senior housing, and mobile homes. Residential uses are located throughout the City. Generally there are higher concentrations of medium and high density residential development near major roadways, in the central portion of the City, in the eastern portion of the City, and surrounding the Northridge Mall. As of 2015, there were approximately 43,000 dwelling units in the City (California Department of Finance 2015).
2.0 Project Description

Non-residential development totaled approximately 43.7 million square feet of building floor area in 2002. Approximately 1,275 acres (10 percent) of land within the city limits and SOI is devoted to industrial use, much of which continues to be used for agricultural product processing. Industrial uses are concentrated in the southern portion of the City along U.S. Highway 101 and Abbott Street. Commercial/office designations accounted for about 770 acres, or six percent of the total. Commercial uses are generally found along the City's major transportation corridors (especially Main and Alisal streets), as well as in the Northridge and Westridge shopping centers located in the northwestern part of the City. Nonresidential uses also include Public/Semipublic uses, such as schools and community facilities, located throughout the SOI. The Salinas Municipal Airport is located in the southeastern portion of the City. Open space land uses comprised approximately 4,670 acres (35 percent) within the city limits and SOI. Most of the open space areas consist of land in agricultural use. Open space areas are concentrated along the various creek corridors, in Sherwood Park, and in various smaller parks scattered throughout the community. The approximately 4,030 acres of agricultural lands are concentrated within the City in Carr Lake and in a large area north of Boronda Road as described below, and outside the city limit but within the SOI in areas near the airport. These areas have, and continue to be, used mainly for the production of row crops and nursery products.

Since 2002, there have been no major changes to the existing or proposed land use patterns described in the General Plan. However, in 2008, the City amended its SOI to include and has annexed an area located north of Boronda road commonly known as the north of Boronda Future Growth Area. The SOI amendment included 3,400 acres and the annexation included 2,388 acres. No changes to the General Plan land uses for this area were made as part of the annexation. The City has received applications for two specific plans (the West Area Specific Plan and the Central Area Specific Plan) whose boundaries comprise a significant portion of this area. As of the date of this program EIR, the City is in the process of refining the draft specific plan documents and preparing the EIRs for both plans. As of the date of this program EIR, a new high school (Salinas Union High School District) is under construction in this area. Further, the Gateway Center Specific Plan was approved in 2011 at the northeast corner of East Boronda Road and San Juan Grade; as of the date of this draft EIR, this project is also under construction. No other development has occurred in this area since adoption of the 2002 General Plan.

Other land use projects are worth noting. In 2010, the City approved a SOI amendment, annexation, and a specific plan for development of agricultural industrial uses for a 257-acre project located in the southwest portion of the City known as the Salinas-Ag Industrial Center (also referred to as Uni-Kool). The Monterey County Local Agency Formation Commission (LAFCO) subsequently approved the SOI amendment and annexation. This site has yet to be developed. As of the date of this program EIR, the City is in the process of considering an application to annex a 64-acre site located along Roy Diaz Street. The project includes
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annexation, a specific plan, and individual development applications for a hotel and travel center on approximately half of the developable area within the annexation boundary. In the future, development of additional industrial uses is anticipated on the balance of the remaining developable portion of the annexation area.

**Land Use Setting within Target Areas Located Outside the SOI**

Land within the Target Areas located outside the SOI is designated Farmlands 40 - 160 Acre Minimum in the Monterey County General Plan. As can be seen in Figure 2, Aerial Photograph - Existing Conditions, these Target Areas are in agricultural use. Several contain ancillary agricultural support facilities and one contains several single-family residences.

### 2.4 CHARACTERISTICS OF THE ECONOMIC DEVELOPMENT ELEMENT

The future prosperity of Salinas is dependent on economic development both within and at the edges of the City, in the improvement of workforce skills, training, and educational opportunities, and in the enhancement of community quality of life and public services and infrastructure. In June 2014, the City Council accepted the draft EDE, which includes goals, policies and actions to advance the City’s prosperity for all residents.

The purpose was to generate inputs to identify key economic development issues and priorities. As an outcome of that process, an economic development vision of a “united, prosperous, healthy, and environmentally sustainable community” was created. The community came together to create a vision for its economic future that is focused on enhancing prosperity through a vision of safety, jobs and health.

The EDE recognizes that additional jobs are needed to satisfy the balance of the City’s anticipated long-term employment needs that would not be met by development of land within the city limits and existing SOI. Job growth is required to meet demand from the existing population and from anticipated population growth through buildout of the General Plan, and to achieve the ideal vision of a mature City economy with a full range of services and job opportunities. General Plan buildout projections for dwelling units, population, and non-residential building square footage are included in Table LU-3 of the General Plan. At buildout, the City’s population is projected at approximately 213,063.

It will take time to achieve the City’s economic development vision due to the depth and breadth of aspirations embodied in the EDE vision. The EDE is meant to provide the strategy to guide future General Plan updates.
2.4.1 Purpose and Statement of Objectives

Purpose of the EDE

The EDE is meant to build upon the economic development strategy in the General Plan, which focuses on business retention and expansion. The goal is to encourage a diverse economy that allows for the continued economic success of the community. Overarching economic development strategies include:

- Provide an adequate inventory of land for job development;
- Continue investments in infrastructure (such as the Salinas Municipal Airport and U.S. Highway 101 overpasses);
- Build the capacity of the workforce (present and future) through education and job training;
- Enhance the community’s unique market niche in agriculture; strengthening and working with agricultural employers to create “value added” jobs in agriculture;
- Collaborate with the Chambers of Commerce, education, and related business interests to pursue business retention strategies including capital formation;
- Ensure that the City’s permit processes are prompt and fees are fair;
- Maintain the viability of the downtown in all of its components: mixed use, residential retail, entertainment, professional and commercial services, and government center;
- Improve and maintain housing affordability and availability in the community;
- Allow growth to occur in a manner that minimizes expansion on agricultural lands, but allows needed economic and residential development; and
- Create a community where crime and violence are low.

Though the General Plan includes other policies that indirectly support the economic development strategies, in general, economic development is not addressed in a comprehensive, focused manner.

Since the General Plan was adopted, the City has come to recognize that a comprehensive Economic Development Element to the General Plan is needed as a tool to focus and direct its economic development efforts. The EDE represents that tool. The purpose of the EDE is to augment the economic development strategy included in the General Plan, and to guide future decisions of the City Council in all aspect of City policy and economic development activities.
To enhance the City’s ability to meet employment needs of a growing population, the EDE identifies Target Areas to provide the expanded land capacity for job-generating land uses needed to meet General Plan buildout projections. The EDE also identifies Economic Development Reserve Areas which are outside the existing SOI. For these Economic Development Reserve Areas, the EDE does not propose any change in authorized land uses under the City of Salinas General Plan.

The additional identification of Economic Development Reserve Areas outside the current SOI foreshadows a potential long-term strategy to enable the City to anticipate and ultimately respond to long-term land demand requirements in retail, business park, and industrial sectors. Although the EDE includes these Economic Development Reserve Areas outside the current SOI, they are purely aspirational at present. Development in these areas outside the SOI is not currently reasonably foreseeable, as such development is not authorized under the current General Plan, and would not be authorized under the General Plan as amended by the EDE. For these reasons, the potential environmental effects of future development within these Economic Development Reserve Areas are not analyzed in this EIR. Any future development in proposed in these Economic Development Reserve Areas would, therefore, be subject to separate environmental clearance/review.

**Statement of Objectives**

Consistent with CEQA Guidelines section 15124(b), a project description for an EIR is required to include a statement of the objectives sought by the proposed project, including “the underlying purpose of the project.” The statement of objectives is intended to help the lead agency to develop a reasonable range of alternatives to evaluate in the EIR and aid decision makers in preparing findings or a statement of overriding considerations, if necessary.

The underlying purpose of the EDE is to provide additional land supply needed to meet long-term employment generation needs through General Plan buildout and to promote availability of new sites to support business growth through focused land use planning, targeted circulation, utility infrastructure improvements, and expanded resource availability. This purpose, in turn, has given rise to the following project objectives, which focus on desired outcomes of the EDE in terms of its land use, job generation, and circulation related strategies and policies:

- Improve the City’s attractiveness as an investment destination for employment-generating businesses by reducing land costs through increased land supply;
- Promote and prepare the Target Areas for private investment;
- Improve economic diversification and expansion within the City;
2.0 Project Description

- Support General Plan land use strategies and policies that promote economic growth through infill development and through revitalizing/redeveloping existing developed areas and/or intensifying uses in existing developed areas such as the Focused Growth Areas;

- Through business expansion and attraction, provide residents with greater opportunities for employment in well-paying, career ladder oriented jobs;

- Become the recreation, entertainment, and sports destination of the Central Coast through improving, enhancing and attracting additional recreational, entertainment and sports related facilities and uses; and

- Invest in public infrastructure to improve circulation, connectivity and access.

The project description and more specifically Section 2.4.3 summarize how these strategies and policies have potential to result in physical environmental changes that require CEQA review at a program level as provided in this EIR.

2.4.2 Organization of Economic Development Element

The EDE was prepared in two volumes. Volume I is the EDE policy document and Volume II contains the technical appendices. Volume I is included as Appendix B on the CD on the inside back cover of this EIR and Volume II is included as Appendix C. Both volumes of the EDE are available via link on the City’s website at: https://www.cityofsalinas.org/our-city-services/community-development/comm-dev-documents. The City’s primary interest with the EDE is to raise economic development priorities to a legislative, General Plan policy level and by doing so, ensure that economic development is considered in all future City planning and decision making actions. It is the City’s intention to adopt the EDE as a general plan amendment and to integrate the EDE content into other General Plan elements through additional General Plan text, table and graphics amendments as described in Section 2.3, Project Description.

The EDE contains three chapters. Chapter 1, Introduction, includes discussion of current City economic conditions and challenges, the EDE preparation process, related plans and programs, and the relationship of the EDE to other General Plan elements. Chapter 2, Economic Development Strategy, is the core of the EDE. It addresses the City’s economic development vision and strategies, and includes goals, policies and actions for implementing the strategies. Chapter 2 also introduces the City’s five-year economic development action plan, for which details are provided in Attachment A of the EDE. Chapter 3, Monitoring and Evaluation Program, sets forth mechanisms by which the City will monitor progress in achieving its economic development goals.
As described in Chapter 2 of the EDE, the City's overarching economic development strategies for implementing the economic development vision include:

- executing development strategies and making land use and infrastructure investments that foster prosperity;
- creating jobs that benefit local residents and businesses;
- facilitating workforce training and education to develop skills needed to meet the needs of existing and future employers; and
- enhancing the quality of life for residents through programs and resources that promote healthy living and well-being.

The fundamental components of the EDE are its goals, policies, and actions. These are the underpinning for realizing the economic development vision and implementing the economic development strategies. Goals, policies, and actions are organized under the following topics:

- **Land Use, Circulation, and Infrastructure**
  
  EDE land use policies focus on revitalization of existing developed areas within the City, developing Carr Lake as a recreation “centerpiece” of the City, and identifying and planning for expanded land capacity at the outer edges of the City that can accommodate/attract large users and clusters of users. Needs for improved transportation connectivity to support economic development within the City and at its outer edges also is addressed through identification of new transportation facilities. Similarly, targeted policies for improving existing and constructing new infrastructure and for expanding availability of resources such as water supply to facilitate economic development are provided.

- **Retail, Entertainment, and Tourism**
  
  Policies for this topic focus on attracting economic investment through promoting the City's positive attributes and amenities; changing negative perceptions of the City as an unsafe destination; creating attractive gateways to the City, targeting opportunities for new retail uses and creating place themed commercial/cultural districts, and attracting new retail development.

- **Job Opportunities**
  
  The EDE addresses job retention and expansion by focusing policies on retaining and expanding existing businesses, diversifying employment opportunities, attracting new industry and investment, and promoting innovation and entrepreneurship.
- **Workforce Development**

  Workforce development policies focus on creating jobs that benefit the local workforce and on facilitating the ability of the local workforce to obtain the skills needed to meet job requirements of existing and future businesses.

- **Neighborhood and Commercial Areas**

  Regarding existing neighborhoods, EDE policies focus on maintaining and enhancing the health of neighborhoods, as the City understands that doing so is an important factor in supporting economic development. Policies address creating incentives for investment in residential neighborhoods, improving the appearance of residential neighborhoods, and empowering citizens to take an active role in neighborhood revitalization. Regarding commercial areas, EDE policies address investment in disinvested commercial corridors and incentivizing redevelopment of underperforming neighborhood shopping centers.

- **Quality of Life**

  This section of the EDE addresses the notion that while cities need revenue from economic development to improve the quality of life of residents, including through provision of government services, infrastructure, etc., quality of life is also an important factor in the ability of the City to attract and retain businesses. Policies address improving community safety, narrowing social and economic disparities in the community, improving community access to open space and recreational opportunities, improving community health and reducing health inequities in part by improving access to healthy food, recreational amenities, and ensuring adequate provision of emergency services.

### 2.4.3 Land Use Pattern and Potential for Change

**Overview**

Implementation of a range of EDE policies and actions would result in construction and operation of new land development projects; public facilities; and roads, water supply, storm drainage, and wastewater infrastructure. These activities have potential to directly or indirectly result in environmental change that is foreseeable with implementation of the EDE. This EIR includes analysis of the environmental impacts of these changes. Policies and actions that could result in environmental change are found throughout EDE Chapter 2, Economic Development Strategy. These are listed in Table 1, EDE Policies and Actions with Potential to Create Environmental Effects. A conservative approach was taken for screening EDE policies and actions for inclusion in the table; it is possible that some in the list may not ultimately result in physical environmental change. Implementation of these policies and actions could result in physical developments that are defined as “projects” pursuant to CEQA Guidelines section 15378. Such projects would be subject to CEQA review.
Table 1  EDE Policies and Actions with Potential to Create Environmental Effects

<table>
<thead>
<tr>
<th>EDE Policy/Action Item</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action LU-1.1.4 – Facilitate advancement of entitlements (for priority Economic Opportunity Areas) through preparation of specific plans, area plans or other planning efforts, engineering analyses, or other technical analyses to potentially reduce development review processing time and costs, if appropriate funding support from partners is available.</td>
</tr>
<tr>
<td>Action LU-1.2.1 – Modify the boundaries of the Focused Growth Overlay Areas as determined appropriate by the City to generally be consistent with the boundaries of the applicable Economic Opportunity Area (O, S, R, U, and X) to promote economic development priorities and infill development.</td>
</tr>
<tr>
<td>Action LU-1.2.2 – Develop corridor plans (or other plans as applicable) and an intensification strategy for each Focused Growth Overlay Area as determined by the City, with emphasis on solving parcel assembly and parking issues to maximize efficiency of development, as well as derivation of gap funding resources in-lieu of redevelopment funding. Update existing Focused Growth Overlay District regulations to adopt infill and corridor intensification standards, as needed, that include incentives such as streamlining entitlement and environmental review processes, and fee deferrals, as appropriate.</td>
</tr>
<tr>
<td>Action LU-1.3.2 – Support key catalyst development projects in the downtown area (Economic Opportunity Areas P and Q), such as the Taylor Farms Corporate Headquarters and other development projects that bring more people into and help revitalize the downtown. With the implementation of the Downtown Vibrancy Plan and the completion of catalyst projects, the City should also consider the following action steps for the downtown and as applicable, the adjoining Alisa! areas... (see full Action text in Appendix X).</td>
</tr>
<tr>
<td>Action LU-1.3.3 – Adopt the Chinatown Plan and Rebound Implementation Strategy to revitalize the area (Economic Opportunity Area R) and connect it to Carr Lake to the north and the Intermodal Transportation Center and downtown to the south. Revise existing policies and regulations as needed to incentivize and streamline new investment (e.g., architectural design standards, signage and gateway program, pedestrian amenities, façade programs, parking management, etc.).</td>
</tr>
<tr>
<td>EDE Policy/Action Item</td>
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<tr>
<td>Action LU-1.3.5 – Create and implement a vision and plan for West Market Street (Economic Opportunity Area W) from the rail station to Davis Road, that is triggered by the Transit Oriented Development Rail Plan and the potential for mixed-use infill, reuse of buildings, and a revitalized corridor. Encourage large employers and employment centers to locate in areas conducive to transit use and other alternative transportation modes, particularly along existing or planned high-capacity regional transit corridors and regional bicycle corridors.</td>
</tr>
<tr>
<td>Action LU-1.3.6 – Create and implement a vision and plan to promote redevelopment of the South Abbott Street Area (Economic Opportunity Area Y) for agricultural industrial and related uses.</td>
</tr>
<tr>
<td>Action LU-1.3.7 – Improve pedestrian, bicycle and vehicular connections from North Main Street to Carr Lake (Economic Opportunity Area S), continue to upgrade and expand the El Gabilan Library, as needed, and amend the Zoning and Zoning Code, as needed, to incentivize investment by landowners.</td>
</tr>
<tr>
<td>Action LU-1.3.9 – On the major Alisal Street corridors (Economic Opportunity Area U), a portion of which includes the Alisal Street/East Market Street Focused Growth Overlay Area, where feasible, widen sidewalks, install corridor meridians and enhanced crosswalks for pedestrian safety; create plazas, urban spaces and parks and provide landscaping, street furniture, and pedestrian-scale lighting. Create a design aesthetic that reflects the culture of the community and provide enhanced code enforcement to enhance health and safety and create and maintain the character of the community.</td>
</tr>
<tr>
<td>Action LU-1.3.10 – Revise the Zoning Code as needed to further promote and encourage the expansion of medical and related uses in Economic Opportunity Area X.</td>
</tr>
<tr>
<td>Policy ED-LU-1.4 – Create and implement a vision and plan and encourage development for the Carr Lake area (Economic Opportunity Area V), and the areas within the Carr Lake vicinity, as the “Sports Capitol of the Central Coast” which serves as a recreational/sports/cultural/commercial “centerpiece” for the community that unites and connects all segments of Salinas to the east, north, downtown, and south with a “park centered” design. Focus on development of retail, additional sports complexes, development of joint-use agreements for use of schools and the Constitution Boulevard regional soccer complex as sports venues, and collaboration with foundations and the private sector, while maintaining Carr Lake’s function as a reclamation/flood control facility.</td>
</tr>
</tbody>
</table>
### EDE Policy/Action Item

<table>
<thead>
<tr>
<th>Action LU-1.4.3</th>
<th>Rezone the Carr Lake area, as applicable, consistent with the adopted Carr Lake Plan.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy ED-LU-1.5</td>
<td>Facilitate the future development of South Boronda (Economic Opportunity Area M).</td>
</tr>
<tr>
<td>Policy ED-LU-1.6</td>
<td>Facilitate the review and approval of the North of Boronda Future Growth Area Specific Plans to create high-quality residential and mixed-use housing opportunities to meet the housing needs of an expanding community workforce (Economic Opportunity Area I and a portion of H).</td>
</tr>
<tr>
<td>Policy ED-LU-1.7</td>
<td>Increase the supply of land adjacent outside of the existing city limits for targeted economic development by expanding the City’s jurisdictional limits and Sphere of Influence, primarily to the north and east for targeted economic development.</td>
</tr>
<tr>
<td>Action LU-1.7.1</td>
<td>Work with the Local Agency Formation Commission, the County of Monterey, the Monterey County Agricultural Land Trust and other affected agencies and stakeholders to expand the City’s Sphere of Influence and Urban Service Area, as well as annex land areas to the City, for Economic Opportunity Areas B, F, K, L, and N.</td>
</tr>
<tr>
<td>Action LU-1.7.2</td>
<td>Work with the Local Agency Formation Commission and other affected agencies and stakeholders to annex Economic Opportunity Areas D, G, H (portion of) and M, which are currently located within the City’s Sphere of Influence, into the City.</td>
</tr>
<tr>
<td>Action LU-1.7.3</td>
<td>Work with Monterey County to revise the Greater Salinas Area Memorandum of Understanding and other related agreements such as tax transfer agreements, to address development on Economic Opportunity Areas located outside the City’s Sphere of Influence as identified in the Economic Opportunity Areas map.</td>
</tr>
<tr>
<td>Action LU-1.8.1</td>
<td>Promote creative and innovative use of the Firestone Business Park site while protecting surrounding agricultural lands.</td>
</tr>
</tbody>
</table>
### EDE Policy/Action Item

**Action LU-1.9.2** – Implement the Salinas Municipal Airport Master Plan focusing first on the following:
- Core area of Airport Boulevard;
- East side properties through partnering with Hartnell College for enhancement of the ag-tech center, with potential land-swap to provide access to east side of the airport from Alisal Road, and other related opportunities; and redesignate and rezone Hartnell Alisal campus, as appropriate;
- Creation of east side access to the future Eastside Expressway;
- Targeting potential users for commercial or freight services such as FedEx and UPS;
- Facilitating development of additional private jet hangars and facilities to further enhance and build on existing hangar development; and
- Continue to enhance and support community destination oriented events, such as the Salinas Airshow “Every Kid Can Fly” program with Rancho Cielo to promote the interest of in careers as pilots or in aviation.

**Policy ED-LU-1.10** – Work with Hartnell College to promote continued development of its East Campus (Economic Opportunity Area E) in a manner that is synergistic between health care, agriculture, technology, education, and emerging industry sectors to address advancing technology in the agricultural industry.

**Action LU-1.11.1** – Work with landowners to create a North Salinas “high-tech” Business Park Plan that focuses on new development adjacent to the new U.S. Highway 101/Russell Road interchange and connects to the current City infrastructure network and City municipal golf course (Area K).

**Action LU-1.11.2** – Work with landowners to create an extension and expansion of retail and related commercial uses in west Salinas, to facilitate the capturing of retail sales leakage out of Salinas (Economic Opportunity Area L)

**Policy ED-LU-1.12** – Work with landowners to fund and develop a plan for future retail commercial development and job growth, and other land uses, as appropriate, at the south end of the City in Economic Opportunity Area N while protecting adjacent productive farmlands and prohibiting additional expansion of urban uses.
### EDE Policy/Action Item

<table>
<thead>
<tr>
<th>Action LU-1.12.2 – Work with the County of Monterey to update the Greater Salinas Area Memorandum of Understanding in order to implement the direction of Policy ED-LU-1.12.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy ED-LU-1.16 – Increase the flexibility of Zoning Code standards and regulations to accommodate the types of economic development activity desired by the City and making the locations identified in the Economic Opportunity Areas more attractive for development. Allow more approvals to be issued at the administrative level.</td>
</tr>
<tr>
<td>Action LU-1.16.1 – Revise the Zoning Code and permitting process, as appropriate, to enable variability in development standards and regulations as applied to development within Economic Opportunity Areas. Tailor or modify standards and the development review process as it applies to zoning consistency determinations for the types of activities and uses sought within the respective areas. Consider incorporating form-based or hybrid code for these areas, where appropriate to enable creativity in site design, promote vibrancy, and allow intensification of use as needed to enhance the financial feasibility of new development and revitalization.</td>
</tr>
<tr>
<td>Policy ED-C-2.1 – Partner with TAMC, Caltrans and other agencies to realize commuter rail service to Salinas from the San Francisco Bay Area, to focus City actions and investment to implement the Salinas Intermodal Transportation Center (SITC) Master Plan, including land acquisition and extension of Lincoln Avenue, and to promote transit-oriented, high-density residential, commercial, and office infill within the SITC plan area.</td>
</tr>
<tr>
<td>Policy ED-C-2.2 – Fund and implement the Downtown Vibrancy Plan recommendations and improve broader access to and within the downtown core area.</td>
</tr>
<tr>
<td>Action C-2.2.1 – Improve connectivity and vehicular/non-vehicular access within the downtown core area by implementing circulation and other connectivity-focused improvements identified in the Downtown Vibrancy Plan that link the intermodal transportation center, Chinatown, Alisal Marketplace, Carr Lake, and the Market Street corridor. Use greening, way-finding techniques, and a themed signage program for this purpose.</td>
</tr>
<tr>
<td>EDE Policy/Action Item</td>
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</tr>
<tr>
<td><strong>Action C-2.2.2</strong> – Evaluate and pursue a new fully functional U.S. Highway 101 interchange to Sherwood Drive to connect the center of the City with the Carr Lake area, including the downtown. Include extension of Casentini Street to Sherwood Drive and extension of Bridge Street to Casentini Street to provide access and enhance commercial value of vacant land adjacent to, and visible from freeway.</td>
</tr>
<tr>
<td><strong>Action C-2.2.3</strong> – Revitalize the streetscape within the downtown core area consistent with recommendations in the Downtown Vibrancy Plan and secure dedicated sources of funding for maintenance.</td>
</tr>
<tr>
<td><strong>Action C-2.3.1</strong> – Create a focused plan for circulation improvements (vehicular and non-vehicular) to connect Constitution Boulevard through Carr Lake to Kern Street, Sherwood Drive and Highway 101, and better connect Market Street as a main access route to downtown.</td>
</tr>
<tr>
<td><strong>Action C-2.3.2</strong> – Create a vehicular bridge over railroad tracks to connect East San Luis to Alisal Marketplace.</td>
</tr>
<tr>
<td><strong>Policy ED-C-2.6</strong> – Plan, design, finance and construct an Eastside Expressway to facilitate agricultural business job growth at the southeast end of the City (Economic Opportunity Area F), improve access for East Salinas workers to employment in Salinas and other areas, facilitate Future Growth Area development (Economic Opportunity Areas H and I), and provide a link to business park development (Economic Opportunity Area K) and the U.S. Highway 101/Russell Road interchange at the north end of the City.</td>
</tr>
<tr>
<td><strong>Policy ED-C-2.9</strong> – Plan, design, finance and construct an extension of Blanco Road from Davis Road to State Highway 68 and southeast to the proposed new U.S. Highway 101/Eastside Expressway interchange at the south end of the City to function as a new Southside Expressway.</td>
</tr>
<tr>
<td><strong>Policy ED-C-2.10</strong> – Partner with the agricultural business community and Monterey County to locate a freight facility adjacent to the City that has statewide, national and international connections and identify a site, freight facility physical and operational needs, funding, and leadership to pursue and develop this facility.</td>
</tr>
<tr>
<td><strong>Action C-2.10.4</strong> – If deemed feasible and appropriate, prepare a specific project plan for site acquisition, development, and operation of an intermodal freight facility.</td>
</tr>
</tbody>
</table>
### EDE Policy/Action Item

<table>
<thead>
<tr>
<th>Policy ED-C-2.13 – Prioritize the creation and enhancement of transit, bicycle, and pedestrian facilities in areas that will attract users. Such areas should include neighborhoods or corridors with high proportions of one- and zero-vehicle households, areas with high residential and/or employment density, concentrations of retail, cultural, and civic destinations and/or areas with reduced parking requirements.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action I-3.1.6 – Utilize the vision and planning effort for Carr Lake to direct storm water for capture and reuse within the City or for surrounding communities for recharge or irrigation purposes.</td>
</tr>
<tr>
<td>Policy ED-I-3.2 – Redesign existing wastewater and storm drainage infrastructure systems, including broad municipal level wastewater and storm water solutions for water reuse, and ensure that outdated infrastructure is upgraded to accommodate existing and future businesses.</td>
</tr>
<tr>
<td>Action I-3.2.2 Implement development regulations that require new development and redevelopment projects to install ‘purple pipe’ improvements to allow for use of reclaimed water.</td>
</tr>
<tr>
<td>Action I-3.2.3 Design, fund and construct improvements to the Industrial Waste Water Treatment Facility to convert the wastewater into potable water or aquifer recharge water for sale or reuse.</td>
</tr>
<tr>
<td>Action I-3.2.4 Plan, design, fund, and construct improvements to the City’s storm water system to allow direct flow to the Industrial Waste Water Treatment Facility for capture and reuse.</td>
</tr>
<tr>
<td>Action RET-1.1.6 Locate new commercial uses in strategic locations to capture tourist/visitor spending (e.g. quality hotels and/or retail commercial at gateways to City, within downtown, within themed districts, or along U.S. Highway 101).</td>
</tr>
<tr>
<td>Action RET-2.1.1 Create gateway entry features, decorative lighting, landscaping, signage, art in public places, and a mural program to promote community culture and celebrate its diversity.</td>
</tr>
<tr>
<td>Policy ED-RET-3.1 Target sites for attracting diverse retail, entertainment, and tourism destinations.</td>
</tr>
<tr>
<td>Action RET-3.1.2 Revise land use and zoning regulations as needed to better promote retail, entertainment, and tourism uses.</td>
</tr>
</tbody>
</table>
**EDE Policy/Action Item**

**Action EGB-2.3.1** – Leverage new development and infrastructure upgrades to install high capacity broadband facilities at key business locations throughout the City, including the south end industrial cluster, north end business cluster, the downtown, and others.

**Action N-1.1.1** – Modify zoning regulations, as necessary, to permit uses that compliment residential land uses as allowed uses, including live-work (existing City ordinance), home businesses, day care, etc., along neighborhood arterials and where they do not conflict with the character of existing residential neighborhoods. Establish criteria to guide hours of operations, parking requirements, employee hours, etc.

**Policy ED-CA-1.1** – Adopt land use policies and development regulations to attract a wide range of new commercial, workplace, live-work, and compatible land uses to the North Main Street and South Main Street corridors (a portion of which are Focused Growth Overlay Areas) in accordance with investor and consumer preferences (see also policy ED-LU-1.2 regarding Focused Growth Areas).

**Action CA-1.1.2** – If viable, prepare independent specific plans for North Main Street and South Main Street that include a long-term development vision; land use design; and policies, regulations, capital improvements, financing, and infrastructure strategies necessary to incentivize, catalyze and sustain desired development based on the market analyses.

**Policy ED-CA-1.2** – Reposition East Alisal Street, East and West Market Street, Abbott Street, North Sanborn Road and Williams Road, as appropriate and feasible, as mixed-use neighborhood boulevards (see policies ED-LU-1.2 and ED-LU-1.3). In their current state, these streets contain a significant number of underutilized parcels whose revitalization would improve the appeal and safety of the street for residents of nearby neighborhoods.

**Action CA-1.2.2** – Leverage proximity to historic and culturally significant neighborhoods to “reposition” East Alisal Street, East and West Market Street, Abbott Street, North Sanborn and Williams Road, as appropriate and feasible, as mixed-use boulevards where residents, workers, and visitors have proximity to a wide range of commercial and workplace land uses in support of pedestrian friendly and vibrant neighborhood corridors. Establish land use polices to incentivize property owners to redevelop properties in accordance with market based realities that raise land productivity. Permit new commercial, live-work, lodging and compatible residential development types.
<table>
<thead>
<tr>
<th>EDE Policy/Action Item</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action CA-1.2.3 – Prepare a long-term vision for each of these corridors, consistent with the themed districts policy (policy ED-LU-1.14), that investors can rely upon and contribute to over time. Designs for commercial corridors should be in accordance with “complete streets” methodology to create safe, attractive, and transit supportive environments that support existing and desired development. Draft corridor plans in coordination with anticipated long-term development visions and transportation improvements for these commercial corridors and evaluate the use of form-based development codes for these underutilized commercial corridors. Communicate long-term values to land owners, tenants, and prospective investors. Target retail and job generating uses that gain value by virtue of the proximity of corridors to the local workforce and consumers.</td>
</tr>
<tr>
<td>Action CA-1.2.5 – Beautify the pedestrian experience and increase safety by enhancing physical separation between pedestrian and automobile traffic. Significantly enhance street tree plantings along primary corridors. Add pedestrian-scaled street lights along corridor segments where enhanced pedestrian activity is desired.</td>
</tr>
<tr>
<td>Action QL-1.1.5 – Develop a new state of the art public safety building.</td>
</tr>
<tr>
<td>Policy ED-QL-3.1 - Create new park space, connect existing and future parks and open space areas/corridors, encourage public art throughout the City, and include this policy and action items in the Community Design Element.</td>
</tr>
<tr>
<td>Policy ED-QL-3.2 – Improve existing parks and recreational facilities in need of repair or upgrading and acknowledge the positive impact on property values from building and maintaining high quality parks across the city. Establish a range of parks and open spaces, including tot lots, neighborhood parks, community parks, skate parks, sports fields and courts, organized sports complexes, plazas/greens and/or greenways/parkways within all new neighborhoods, business districts and commercial areas, but especially in areas with low park level of service.</td>
</tr>
<tr>
<td>Action QL-3.2.1 – Improve existing parks and open space facilities and expand recreational programs as a means of improving the health of Salinas’ residents. Active play structures and/or amenities should be designed to accommodate a range of ages and physical abilities.</td>
</tr>
</tbody>
</table>
### EDE Policy/Action Item

| Action QL-3.3.2 – Establish an interconnected open space network throughout Salinas that serves as a network for active transportation, recreation and scenic beauty and connects all existing and future areas of the City, where feasible. In particular, connections should be made between preserved open spaces, parks, the downtown, Alisal, North Salinas, Neighborhood Centers and other destinations within the City.  
Action QL- 6.1.15 – Develop and improve state of the art fire stations, equipment and fire apparatus. |
|---|

**Source:** City of Salinas Draft Economic Development Element 2014, EMC Planning Group 2016.
Three economic development-related technical analyses were prepared to inform the development capacity analysis detailed below: 1) Salinas Retail Analysis prepared by Applied Development Economics (ADE) in 2013; 2) Salinas Economic Development Element Target Industry Analysis prepared by ADE in 2013; and 3) Site Opportunities and Constraints Analysis, prepared by Economic and Planning Systems (EPS) in 2013. These reports are included in Volume II of the EDE as Appendices B, C, and D, respectively and were the basis for the development of Tables 3 to 8 as discussed below.

**Economic Opportunity Areas**

The General Plan and EDE reflect a key City goal to generate employment opportunities that meet the current and future needs of its residents. City-centered infill development and revitalization of existing urban areas called for in the General Plan, and reinforced through the EDE, have potential to generate substantial new employment opportunities. However, due to constraints such as land area, parcel assembly, and infrastructure capacity, infill development opportunities often do not match the needs of businesses whose operations require larger land area, new or higher capacity infrastructure, more direct access to the regional transportation network, or are influenced by other business siting and development factors. Vacant lands outside the city limits provide opportunities for new large job generating employment centers that are less constrained than is generally the case with infill development in urban centers.

In the EDE, a total of twenty-five (25) Economic Opportunity Areas located within existing city limits, within portions of the City’s existing SOI, and just outside the SOI, were identified and mapped through the community outreach process. These EOAs were created to provide policy direction for catalyzing development opportunities. Figure 3, Economic Opportunity Areas, shows the generalized locations of the EOAs identified through the outreach process. Seventeen (17) of the twenty-five EOAs are located within the city limits, two EOAs are located within the SOI, and six (6) are located outside of the SOI (as opposed to five Target Areas outlined below).

Through the development of the Notice of Preparation (NOP), these EOAs were further refined as shown in Figure 4, Refined Economic Opportunity Area Boundaries, and Table 2, Refined Economic Opportunity Area Acreages and Locations. Through this process, it was determined that only relatively small portions of the subject EOAs, are needed for new land supply within the reasonably foreseeable future, as the entire acreage within the boundaries of the EOAs is much greater than required to support the requisite additional job-generating economic development projected at General Plan buildout. These areas of new land supply are termed “Target Areas” are shown on Figure 6, Target Areas and Economic Development Reserve Areas, which is described in more detail in the Economic Opportunity Areas Outside the Existing Sphere Of Influence subsection below. The Target Areas represent locations where additional new development beyond that envisioned in the General Plan could occur in the foreseeable future. The Target Areas represent new locational options for job generating
development and provide the City with new flexibility for attracting job-generating businesses. A SOI amendment, annexation, specific plan, project-specific development plans, and additional CEQA analysis would be required for any one of the five Target Areas now located outside the SOI to be developed.

Table 2  Refined Economic Development Opportunity Area Acreages and Locations

<table>
<thead>
<tr>
<th>Opportunity Area</th>
<th>Acreage</th>
<th>Boundary Relationships</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>City Limits</td>
</tr>
<tr>
<td></td>
<td></td>
<td>In</td>
</tr>
<tr>
<td>A Uni-Kool</td>
<td>259.35</td>
<td>X</td>
</tr>
<tr>
<td>B Abbott Street Extension</td>
<td>167.65</td>
<td>X</td>
</tr>
<tr>
<td>C Airport Industrial Park</td>
<td>86.16</td>
<td>X</td>
</tr>
<tr>
<td>D Airport West</td>
<td>343.04</td>
<td>X</td>
</tr>
<tr>
<td>E Airport East/Hartnell</td>
<td>175.98</td>
<td>X</td>
</tr>
<tr>
<td>F Eastern Expressway</td>
<td>2,530.04</td>
<td>X</td>
</tr>
<tr>
<td>G Alisal/Airport East</td>
<td>395.63</td>
<td>X</td>
</tr>
<tr>
<td>H East Future Growth Area</td>
<td>1,397.67</td>
<td>X</td>
</tr>
<tr>
<td>I West/Central Future Growth Area</td>
<td>1,541.43</td>
<td>X</td>
</tr>
<tr>
<td>J North Future Growth Area</td>
<td>2,155.76</td>
<td>X</td>
</tr>
<tr>
<td>K North Entrance</td>
<td>1,190.48</td>
<td>X</td>
</tr>
<tr>
<td>L1/L2 Westside Expressway</td>
<td>431.05/378.61</td>
<td>X</td>
</tr>
<tr>
<td>M Boronda South</td>
<td>208.00</td>
<td>X</td>
</tr>
<tr>
<td>N Highway 68 Gateway</td>
<td>293.23</td>
<td>X</td>
</tr>
<tr>
<td>O Valley Center Corridor</td>
<td>145.49</td>
<td>X</td>
</tr>
<tr>
<td>P Vibrancy Plan Area</td>
<td>223.67</td>
<td>X</td>
</tr>
<tr>
<td>Q TOD Rail Infill</td>
<td>74.55</td>
<td>X</td>
</tr>
<tr>
<td>R Chinatown</td>
<td>29.17</td>
<td>X</td>
</tr>
<tr>
<td>S North Main Street</td>
<td>292.80</td>
<td>X</td>
</tr>
<tr>
<td>T Alisal Market Place</td>
<td>132.26</td>
<td>X</td>
</tr>
<tr>
<td>U East Alisal/East Market</td>
<td>309.82</td>
<td>X</td>
</tr>
<tr>
<td>V Carr Lake</td>
<td>989.89</td>
<td>X</td>
</tr>
<tr>
<td>W West Market</td>
<td>153.72</td>
<td>X</td>
</tr>
<tr>
<td>X Abbott</td>
<td>204.32</td>
<td>X</td>
</tr>
<tr>
<td>Y Lower Abbott</td>
<td>618.23</td>
<td>X</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>14,728.00</strong></td>
<td>X</td>
</tr>
</tbody>
</table>

Source: EMC Planning Group 2016

Notes: 1'The western portion of EOA H is within the city limit, while the eastern portion is outside the city limit, but within the SOI.'
ECONOMIC OPPORTUNITY AREAS

Salinas Economic Development Element Program EIR

Figure 3

Legend

City Boundary
Opportunity Areas

Abbott Street Extension (B)
Airport Industrial Park (C)
Airport West (D)
Airport East/Hartnell (E)
Eastern Expressway (F)
Alisal/Airport East (G)
East Future Growth Area (H)
West & Central Future Growth Area (I)
North Future Growth Area (J)
North Entrance (K)
Westside Expressway (L1 & L2)
Borondo South (M)
Highway 68 Gateway (N)
Valley Center Corridor (O)
Vibrancy Plan Area (P)
TOD Rail Infill (Q)
Chinatown (R)
North Main Street (S)
Alisal Market Place (T)
East Alisal/East Market (U)
Carr Lake (V)
West Market (W)
Abbott (X)
Lower Abbott (Y)

*Note: Locations of potential expressways are approximate and subject to further study.

Source: City of Salinas 2012, ESRT 2010
2.0 Project Description

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Figure 4
Refined Economic Opportunity Area Boundaries
Salinas Economic Development Element Program EIR
Five of the Target Areas are located outside the SOI. The remainder of each of these EOAs is defined as an “Economic Development Reserve Area” as shown on Figure 6. No new development is contemplated by the EDE within the Economic Development Reserve Areas. These latter areas, however, do indicate locations where the City might contemplate new growth beyond the General Plan buildout timeframe. No such development could occur in the Economic Development Reserve Areas without additional General Plan amendments and LAFCO actions, including SOI amendment, annexation, specific plan, project-specific development plans, and additional CEQA analysis. An overview of LAFCO criteria for the consideration and processing of SOI and annexation applications for future development is provided in Section 3.15, Other CEQA Topics.

**Development Capacity of Economic Opportunity Areas**

The General Plan and EDE reflect a key City goal to generate employment opportunities that meet the current and future needs of its residents. As described above, analyses were prepared to inform the EDE preparation containing important data and information regarding employment needs projections through General Plan buildout. These capacity analyses evaluated industry types, land demand, and capacity of vacant land located primarily within city limits and the SOI in order to accommodate employment generating uses (e.g. industrial, office, and commercial/retail uses). The employment generating capacity of vacant/underutilized land within the city limits and SOI was projected based on this information. The remaining unmet balance of land capacity needed to meet employment demand through General Plan buildout within the EOAs located outside the SOI was then determined.

Table 3, Land Demand for Employment Generating Industrial, Retail, and Business Park Land Use at General Plan Buildout, shows the total number of net acres of land needed to accommodate new job-generating industrial (including agricultural uses), retail, and business park land uses that provide the total of 20,843 jobs needed. The table summarizes the total land demand in net acres and the building square footage that can be accommodated within that land. Net land demand is estimated at 973 acres. Table 12 of the *Salinas Economic Development Element Target Industry Analysis* (Applied Development Economics 2013) in Appendix C of Volume II of the EDE identifies that approximately 45,000 jobs will be needed at General Plan buildout. Demand for 20,843 jobs from industrial (including agricultural industrial), retail/commercial, and business park development is projected. The balance of 24,157 jobs is forecast to be generated from institutional (e.g. governmental, health care, etc.) and visitor-serving development. Land demand for job-generating institutional and visitor-serving uses is not included in Table 3. It is assumed that job-generating development within these two sectors can be accommodated on vacant/underutilized infill parcels within the city limits and/or through redevelopment/revitalization of existing developed areas within the city limits.
Table 3  Land Demand for Employment Generating Industrial, Retail, and Business Park Land Uses Land Uses at General Plan Buildout

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Jobs Needed at General Plan Buildout</th>
<th>Land Demand (net acres)</th>
<th>FAR(^1)</th>
<th>Building Demand (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial(^2)</td>
<td>10,287</td>
<td>591</td>
<td>.30</td>
<td>7,715,347</td>
</tr>
<tr>
<td>Retail</td>
<td>3,985</td>
<td>201</td>
<td>.25</td>
<td>2,192,157</td>
</tr>
<tr>
<td>Business Park</td>
<td>6,571</td>
<td>181</td>
<td>.35</td>
<td>2,759,526</td>
</tr>
<tr>
<td>Total</td>
<td>20,843</td>
<td>973</td>
<td></td>
<td>12,667,030</td>
</tr>
</tbody>
</table>

Source: Data from and revision to Table 12 in Salinas Economic Development Element Target Industry Analysis, ADE 2013.

Note: \(^1\)FAR from Table 12 in Salinas Economic Development Element Target Industry Analysis, ADE 2013, replaced with FAR standards from City of Salinas General Plan.
\(^2\)Includes both agricultural sector and industrial sector development types shown in Table 12 in Salinas Economic Development Element Target Industry Analysis, ADE 2013.

As is standard practice for determining employment-generating land demand, a “market efficiency factor” is applied to promote development investment. A market efficiency factor takes into account the notion that as land supply for employment generating uses tightens, land prices increase, and overall market dynamics begin to break down. A market factor of 20 percent additional land capacity is used to promote market efficiency by promoting land sale price competition among landowners.

Table 4, Total Net Land Demand and Total Building Capacity Needed for New Employment Generating Uses with Market Efficiency Factor, shows that total land demand for employment generating land uses increases to 1,127 acres and total building capacity increases to 14,762,005 square feet with inclusion of the market efficiency factor.

Table 4  Total Net Land Demand and Total Building Capacity Needed for New Employment Generating Uses with Market Efficiency Factor

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Land Demand (net acres)</th>
<th>20 Percent Buffer (net acres)</th>
<th>Net Land Demand (net acres)</th>
<th>Total Building (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial</td>
<td>591</td>
<td>118</td>
<td>709</td>
<td>9,258,417</td>
</tr>
<tr>
<td>Retail</td>
<td>201</td>
<td>NA</td>
<td>201</td>
<td>2,192,157</td>
</tr>
<tr>
<td>Business Park</td>
<td>181</td>
<td>36</td>
<td>217</td>
<td>3,311,431</td>
</tr>
<tr>
<td>Total</td>
<td>973</td>
<td></td>
<td>1,127</td>
<td>14,762,005</td>
</tr>
</tbody>
</table>

Economic Opportunity Areas (EOA) within the City Limits (Except EOA V)

Nineteen of the twenty-five EOAs are located within the city limits and SOI. Land use designations and development capacity for these EOAs are already established in the existing General Plan. Infill development on vacant and/or underutilized land within these EOAs, especially those located within the city limits, is already assumed and identified as a priority in existing General Plan policies. Similarly, revitalization of existing developed areas within many of these EOAs is also considered and identified as a priority in the General Plan.

The EDE includes policies that promote development within many of the EOAs located within the city limits. The themes of these policies commonly address: vision for the types, design, and outcomes of revitalization activities that are encouraged to achieve EDE objectives; suggest preparation of plans such as specific plans and areas plans whose adoption could streamline future development within particular EOAs, and/or identify programs/actions to collaborate with other agencies/interests to promote economic development. With the exception of policies and actions related to five EOAs located outside the SOI and the Carr Lake EOA within the city limits (as discussed below), EDE policies generally do not include direction calling for increased development capacity or development densification through specific General Plan land use designation changes or through rezoning actions. Rather, the EDE reinforces General Plan land use strategies and policies that provide direction for increased development capacity, infill, and revitalization/redevelopment of existing areas, the impacts of which have already been identified in the General Plan EIR.

It is possible that EDE policies could catalyze preparation of plans (e.g. specific plans) or submission of development proposals that do propose an increase in development capacity and/or development density. If increases in development capacity were to be proposed as part of future plans or individual development projects, such projects would require discretionary approvals from the City and additional detailed CEQA analysis. However, it would be entirely speculative at present to project when, where, and to what extent the EDE might indirectly facilitate development not already contemplated in the General Plan or to assume that such development is reasonably foreseeable. The potential for the EDE to result in environmental impacts through indirectly inducing growth within EOAs in the city limits and SOI is further discussed in Section 5.2, Growth Inducing Impacts.

Opportunity Area V - Carr Lake

EOA V is the only EOA located within the SOI for which the EDE explicitly proposes an increase in development capacity relative to development capacity assumptions already identified in the General Plan. EOA V has this distinction because it is envisioned in the EDE
for a unique economic development purpose – a centerpiece for future recreational opportunities that could, in part, be made possible through revenue or land arrangements made possible by development of supporting recreation-supporting commercial uses. A 73-acre portion of EOA V was purchased by the Big Sur Land Trust in 2016. A visioning process for the subject land is planned and will address its relationship to the vision for Carr Lake included in the EDE.

**Economic Opportunity Areas Within the Existing Sphere Of Influence**

In concert with reinforcing the General Plan Land Use strategy of infill/revitalization, the EDE prioritizes accommodating the balance of additional new employment generating industrial, retail, and business park uses on land outside of the city limits, but within the SOI. These larger tracts of vacant land are suitable for accommodating larger scale employment centers for which urban infill opportunities do not exist and/or are highly constrained for the types of envisioned end uses. As shown in Table 5, Land Supply within Vacant EOAs Located within the Sphere of Influence, this would provide additional land capacity that contributes to, but does not fully meet the balance of land demand/building development capacity needed to for long-term employment generation needs through General Plan buildout.

Table 5 shows that 1,207 gross acres are available for development within these EOAs. Net acreage available for new building capacity is lower (781 acres) given land required for infrastructure, roads, avoiding environmental constraints, etc. Gross acreage has been reduced by 35 percent to account for this land requirement. Available building capacity within these EOAs is 10,306,666 square feet based on General Plan FARs for each land use.

Similar to the areas within city limits, the EDE strategies and policies do not propose an increase in development capacity within the SOI beyond what was contemplated in the General Plan. However, it is possible that EDE policies could catalyze submission of development proposals that propose an increase in development capacity. If increases in development capacity were proposed as part of future plans or individual projects, such projects would require discretionary approvals from the City and additional detailed CEQA analysis.

**Economic Opportunity Areas Outside the Existing Sphere Of Influence**

The City believes that lack of available vacant land within the city limits and the existing SOI has been a constraint to the City's economic growth opportunities. Vacant, developable land is needed to accommodate expansion of existing businesses and attract new businesses to meet future employment needs, and to promote a healthy jobs-to-housing balance. The City has
repeatedly lost desirable opportunities for private investment for this reason. A significant feature of the EDE is its policy direction for expanding the City's vacant, developable land supply to meet the City's projected employment needs based on its projected population at buildout of the General Plan. The EDE contains policies that promote job generating land uses in a manner that balances infill development and redevelopment with new development capacity on lands located contiguous to, but outside the existing SOI. The City recognizes that balancing between infill/revitalization of existing developed areas with development of vacant land at the periphery of the City is essential.

Table 5  Land Supply within Vacant EOAs Located within the Sphere of Influence

<table>
<thead>
<tr>
<th>EOA</th>
<th>Land Use</th>
<th>Gross Acres&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Net Acres&lt;sup&gt;2&lt;/sup&gt;</th>
<th>FAR</th>
<th>Building Square Feet&lt;sup&gt;3&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>A - Ag Industrial Park</td>
<td>Industrial</td>
<td>259</td>
<td>169</td>
<td>.30</td>
<td>2,202,971</td>
</tr>
<tr>
<td>C - Airport Industrial Park</td>
<td>Industrial</td>
<td>86</td>
<td>56</td>
<td>.30</td>
<td>731,860</td>
</tr>
<tr>
<td>D - Airport West</td>
<td>Industrial</td>
<td>172&lt;sup&gt;4&lt;/sup&gt;</td>
<td>111</td>
<td>.30</td>
<td>1,456,883</td>
</tr>
<tr>
<td>G - Alisal/Airport East</td>
<td>Industrial</td>
<td>396</td>
<td>257</td>
<td>.30</td>
<td>3,358,476</td>
</tr>
<tr>
<td>Subtotal Industrial</td>
<td></td>
<td>913</td>
<td>593</td>
<td></td>
<td>7,752,274</td>
</tr>
<tr>
<td>V - Carr Lake</td>
<td>Retail</td>
<td>115&lt;sup&gt;5&lt;/sup&gt;</td>
<td>74</td>
<td>.25</td>
<td>810,448</td>
</tr>
<tr>
<td>E - Airport East</td>
<td>Business Park</td>
<td>176</td>
<td>114</td>
<td>.35</td>
<td>1,743,944</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>1,204</strong></td>
<td><strong>781</strong></td>
<td></td>
<td><strong>10,306,666</strong></td>
</tr>
</tbody>
</table>

Source: Data from and revision to Table 12 in Salinas Economic Development Element Target Industry Analysis, ADE 2013.

Note:  
1Gross acreage based on Table 1 except where noted.  
2Net acreage is .65 x gross acreage to reflect land deductions for infrastructure, site constraints, etc. Net acres are rounded to the nearest acre.  
3Building square footages reflect net acres to two decimal places.  
4Gross acreage reduced by 50 percent from 343 acres to 172 acres to reflect that much of the EOA is within a floodplain.  
5Gross acreage is reduced from 990 acres to 115 acres to reflect underlying Open Space and Public/Semi-Public land use designations and to reflect the portion of EOAV for which the City is considering a General Plan land use change as part of the EDE.

Six of the 25 EOAs identified in the EDE (EOAs B, F, J, K, L1/L2, and N) are located outside the City's existing SOI. Note that EOA L1/L2 was initially considered to be two components of one EOA during the EDE development process. EOA J was evaluated as a study area in the draft EDE, but was not carried forward as a potential destination for future economic development. It is illustrated only to reflect the fact that the area was discussed as part of the original EDE preparation/public outreach process. In addition to the limited supply of vacant land within the existing SOI to accommodate job generating uses, the five remaining EOAs
would be available to provide additional developable land opportunities for employment generating uses. Figure 5, Refined Economic Opportunity Areas – Proposed General Plan Land Use, illustrates the locations of the five EOAs outside the SOI.

Each of the five EOAs was assigned a General Plan land use designation solely to address the types of future market opportunities envisioned for the City and to diversify land use types and the types of employment opportunities that would be possible based on the land use type. The assignment of land use designations was fundamentally influenced by variables including the overall EDE vision, market analyses conducted during the EDE analysis process, land use relationships, and environmental/infrastructure opportunities and constraints. The assignment of land use designations at this stage was not intended to reflect the ultimate acreage that might be needed to support new job-generating development.

These five EOAs were identified in part to meet projected land demands for new, larger job generating employment centers. They were also identified to provide additional inventory of vacant land that is sufficient to manage land costs by promoting competition for land development opportunities, provide flexibility to respond to location needs of new businesses, especially those that require significant land area and/or benefit from being co-located in larger employment centers, and to signal the City’s vision for potential economic growth direction beyond that captured in the current General Plan.

Land demand/building capacity allocated to EOAs outside the SOI is equal to the total land demand/building capacity required shown in Table 4 minus the total available land/building capacity shown in Table 5 for EOAs located outside the city limits but within the SOI. For EOAs located outside the SOI, a total of 442 gross acres of land is required with a minimum building capacity of 4,455,299 square feet to close the gap between what is already available land supply and what is needed to meet projected job creation projections through General Plan buildout. Table 6, Land Demand/Building Capacity Required in EOAs Outside the Sphere of Influence, summarizes the gross land demand, net land demand, and building capacity based on General Plan FARs for EOAs located outside the SOI that is needed for employment-generating development to help meet employment needs through General Plan buildout.

As emphasized repeatedly above, however, development within the Economic Opportunity Reserve Areas outside the existing SOI is not currently reasonably foreseeable, and this EIR does not attempt to address the environmental effects that would occur with buildout of these the Economic Opportunity Reserve Areas. From a market demand standpoint, potential development in these areas would likely not occur within the time horizon of the current General Plan. Furthermore, before any development could occur, the proponents of projects in those areas would have to seek and obtain SOI amendments, annexations, specific plans, project-specific development plans, additional CEQA analyses, and site-specific City approvals before any actual development could occur.
CJ Parcels

Opportunity Areas

City Limit

Sphere of Influence

0.75 miles

Land Use - Proposed

- Mixed Use
- Retail
- General Industrial
- Open Space
- Business Park
- Public/Semi Public
- Future Study Area (no development capacity assigned)

Source: City of Salinas 2014, Monterey County GIS Database 2010, Esri 2015

Figure 5

Refined Economic Opportunity Areas – Proposed General Plan Land Use

Salinas Economic Development Element Program EIR

Approximately 10 acres of retail assumed within both Opportunity Areas F and B. Location assumed in association with future planned U.S. Highway 101 interchange.
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As further outlined below in the subsection labeled Target Areas, locations for future development within the EOAs were defined based upon the amount of land needed to enable the requisite amount of job-generating development needed. A refined land/development capacity analysis was undertaken resulting in subareas within EOAs B, F, K, L2, and N.

Table 6  Land Demand/Building Capacity Required in EOAs Outside the Sphere of Influence

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Land Demand (gross acres)</th>
<th>Land Demand (net acres)</th>
<th>FAR</th>
<th>Building Capacity (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial</td>
<td>147</td>
<td>115</td>
<td>.30</td>
<td>1,502,820</td>
</tr>
<tr>
<td>Retail</td>
<td>164</td>
<td>127</td>
<td>.25</td>
<td>1,383,030</td>
</tr>
<tr>
<td>Business Park</td>
<td>132</td>
<td>103</td>
<td>.35</td>
<td>1,570,338</td>
</tr>
<tr>
<td>Total</td>
<td>442</td>
<td>345</td>
<td></td>
<td>4,456,188</td>
</tr>
</tbody>
</table>


Note: 1Data derived by subtracting land supply data in Table 4 from total land demand data in Table 3 for each respective land use type.
2Net acreage equals .65 x gross acreage to reflect land deductions for infrastructure, site constraints, etc., plus 20 percent land efficiency factor.
3Total building capacity slightly exceeds required minimum of 4,455,299 square feet due to rounding.

Target Areas

The EOAs outside city limits and Carr Lake contain substantial acreage. Buildout of all land within these EOAs per their assigned land use designations would result in substantially more land capacity and job generation capacity than is currently forecast as necessary to meet employment generation needs through General Plan buildout. To more precisely define the amount of land needed to enable the requisite amount of job-generating development needed, a refined land/development capacity analysis was undertaken resulting in subareas within each EOA referred to as “Target Areas”.

The locations of these Target Areas are illustrated in Figure 6 and represent the destination for the total amount of new development needed to generate additional jobs to meet employment needs through General Plan buildout. The Target Areas generally comprise a small percentage of the land area within each of their respective EOAs.

Because development of the Target Areas is considered reasonably foreseeable, this EIR includes analysis of the environmental impacts of such development. Although specific future development proposals would be subject to separate, site-specific environmental
clearance/review, the future site-specific environmental documents for those projects may tier off this Program EIR. Alternatively, if between the present and the time such development proposals are submitted to the City, the City has already completed a General Plan Update with a program EIR that addresses development in the areas in question, tiering off such a future EIR might also be possible.

**Target Areas Within Sphere of Influence - Carr Lake**

Figure 6 shows a change in General Plan land use for a portion of EOA V - Carr Lake to reflect new retail development capacity assigned to it. The retail use is intended to support recreational uses envisioned for lands within the remainder of EOA V. The assignment of the land use designation was fundamentally influenced by variables including the overall EDE vision, market analyses conducted during the EDE analysis process, land use relationships, and environmental/infrastructure opportunities and constraints. The assignment of this land use designation was not intended to reflect the ultimate acreage.

Note that the land demand/building development capacity shown in Table 5 for EOA V - Carr Lake, is also distributed into its Target Area as shown in Figure 6.

**Target Areas Outside Sphere of Influence**

Distribution of Additional Required Land Demand to EOA “Target Areas”. The 442 gross acres of additional required land demand identified previously in Table 6 has been distributed to the EOAs outside the SOI as shown in Table 7, Distribution of Land Demand to EOAs Located Outside the SOI. Land demand for each land use type has been distributed to EOAs that are designated the same land use. Please refer back to Figure 5 for the proposed EOA land use designations. All industrial land demand acreage is allocated to EOA B. Business park land demand acreage is allocated to a portion of EOA K. Retail land demand acreage is allocated to portions of EOAs B, F, K, L2, and N. The allocation of retail land demand was informed by the economics technical analyses conducted to support the EDE process. These analyses include: Applied Development Economics. *Salinas Retail Analysis* (Applied Development Economics 2013), *Salinas Economic Development Element Target Industry Analysis* (Applied Development Economics 2013), and *City of Salinas Economic Development: Site Opportunities and Constraints Analysis* (Economic and Planning Systems 2013). All three of these technical analyses can be found in Volume II of the EDE included in this EIR as Appendix C.

Several variables were considered in distributing land demand and development capacity to the Target Areas. General variables included prioritizing sites located adjacent to existing urban development, sites to which existing utility infrastructure is assumed to be most readily extended (detailed infrastructure analysis has not been conducted to date for this purpose), and sites with
Target Areas and Economic Development Reserve Areas

Source: City of Salinas 2014, Monterey County GIS Database 2010, Esri 2015

Figure 6

Salinas Economic Development Element Program EIR
2.0 Project Description

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proximity to transportation access. Potential environmental/hazard constraints (e.g. location of flood hazard areas) that might otherwise limit development potential were also considered as was the need to reduce conversion of the most productive agricultural lands adjacent to the City.

### Table 7 Distribution of Land Demand to EOA Target Areas Located Outside the SOI

<table>
<thead>
<tr>
<th>EOA</th>
<th>Land Use</th>
<th>% of Total Land Use Designation</th>
<th>Land Demand (gross acres)</th>
<th>Land Demand (net acres)</th>
<th>Building Capacity (square feet)¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>B</td>
<td>Industrial</td>
<td>100%</td>
<td>147</td>
<td>115</td>
<td>1,502,820</td>
</tr>
<tr>
<td>F</td>
<td>Industrial</td>
<td>0%</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td><strong>Subtotal Industrial</strong></td>
<td></td>
<td><strong>147</strong></td>
<td><strong>115</strong></td>
<td><strong>1,502,820</strong></td>
</tr>
<tr>
<td>B</td>
<td>Retail</td>
<td>---</td>
<td>10</td>
<td>8</td>
<td>87,120</td>
</tr>
<tr>
<td>F</td>
<td>Retail</td>
<td>---</td>
<td>10</td>
<td>8</td>
<td>87,120</td>
</tr>
<tr>
<td>K</td>
<td>Retail</td>
<td>---</td>
<td>30</td>
<td>23</td>
<td>250,470</td>
</tr>
<tr>
<td>L2</td>
<td>Retail</td>
<td>---</td>
<td>74</td>
<td>57</td>
<td>620,730</td>
</tr>
<tr>
<td>N</td>
<td>Retail</td>
<td>---</td>
<td>40</td>
<td>31</td>
<td>337,590</td>
</tr>
<tr>
<td></td>
<td><strong>Retail Subtotal</strong></td>
<td></td>
<td><strong>164</strong></td>
<td><strong>127</strong></td>
<td><strong>1,383,030</strong></td>
</tr>
<tr>
<td>K</td>
<td>Business Park</td>
<td>100%</td>
<td>132</td>
<td>103</td>
<td>1,570,338</td>
</tr>
<tr>
<td>N</td>
<td>Business Park</td>
<td>0%</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td><strong>Business Park Subtotal</strong></td>
<td></td>
<td><strong>132</strong></td>
<td><strong>103</strong></td>
<td><strong>1,570,338</strong></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td><strong>443</strong></td>
<td><strong>345</strong></td>
<td><strong>4,445,511²</strong></td>
</tr>
</tbody>
</table>

*Source:* ADE 2015 and EMC Planning Group 2016

*Note:* ¹Building capacity based on General Plan FAR of .30 for Industrial, .25 for Retail, and .35 for Business Park. ²Total building square footage differs from Table 5 total building square footage due to rounding.

In the case of Target Area N, development of EOA N with retail uses was a recommendation of stakeholders as part of the EDE public participation process. However, the County, as part of its comments on the Notice of Preparation (NOP), expressed concern about growth of the City to the south, and has suggested that agricultural support uses would be more appropriate if such growth were to occur. While Target Area N is retained as part of the proposed project to reflect stakeholder input, this EIR includes two project alternatives – Alternative 2: GSA MOU Amendment and Alternative 3: GSA MOU Consistency (see Section 6.0, Alternatives) – both analyze the removal of Target Area N in response to the County’s NOP comment.
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Economic Development Reserve Areas

The land remaining within each of these EOAs is designated Economic Development Reserve Area as shown in Figure 6. No changes in planned land uses under the existing General Plan are anticipated within the Economic Development Reserve Areas. No development capacity of any kind has been assigned to these Economic Development Reserve Areas because sufficient new development capacity is provided within the Target Areas. Development of the Economic Development Reserve Areas is not reasonably foreseeable. The Economic Development Reserve Areas are intended only to illustrate locations where the City may look to expand over the very long term (beyond buildout of the current General Plan) to implement the long-term economic development vision embodied in the EDE. Therefore, this EIR does not include analysis of the environmental effects of future development within Economic Development Reserve Areas. Information regarding the Economic Development Reserve Areas is included in the technical studies attached as appendices for disclosure purposes, not because any development is reasonably foreseeable within those areas.

Expressways

The EDE includes a conceptual vision for a realigned and extended Eastside and Westside Expressway and a new Southside Expressway. The conceptual alignment of the segment of the Eastside Expressway that was included in the General Plan would be moved east so that its southern terminus is connected to a planned interchange on U.S. Highway 101. It is also shifted so that its northern terminus can be logically extended to the north and west to connect to the new Sala Road/U.S. Highway 101 interchange. In addition, the Westside Expressway would be extended to the north to connect to the new Sala Road/U.S. Highway 101 interchange.

A new Southside Expressway is also presented as a concept in the EDE. It extends from the Blanco Road/Davis Road intersection to the planned U.S. Highway 101 interchange at Harris Road.

As stated above, the Eastside and Westside expressway extensions and the new Southside Expressway corridor locations are conceptual. Additional EDE policies call for detailed analyses to identify specific expressway plan lines and funding mechanisms.

Although analysis of the expressways was initially included in technical studies prepared for this EIR, through subsequent analysis it was determined that the expressways, being only conceptual at present, are not reasonably foreseeable. Therefore, they are presented in the EDE as future strategy to be considered in subsequent General Plan updates. Such future processes will determine whether the City ultimately makes policy commitments to proceed with the expressways. For this reason, no analysis of the environmental effects of constructing or operating the expressways is included in this EIR. If they are ever find their way into the City’s
General Plan and are formally proposed for construction, new expressway projects will be reviewed to determine their individual CEQA compliance requirements. The type of CEQA analysis required would be determined at the time a project is proposed.

**Development Assumptions with Adoption of EDE**

Building on the City's current General Plan land use policy, the EDE provides a land use framework where existing General Plan infill and revitalization/redevelopment strategies policies are reinforced and where development of larger tracts of vacant land by larger businesses and/or clusters of related businesses go hand in hand in iterative steps and to provide opportunities for employment generation from a wide variety of businesses.

Outside of these assumptions, it would be entirely speculative to project when, where, and to what extent the EDE might indirectly facilitate development not already contemplated in the General Plan or to assume that such development is reasonably foreseeable. Nevertheless, the potential for the EDE to result in environmental impacts through indirectly inducing growth within the city limits and SOI is reviewed in Section 5.2, Growth Inducing Impacts. Also, if increases in development capacity are proposed as part of future plans or individual development projects, such projects would require discretionary approvals from the City and additional detailed CEQA analysis.

**Infill Development Capacity**

The land use strategy in the General Plan prioritizes infill development as a means to revitalize many of the City's commercial areas and to promote development intensification, partially as a means to reduce pressure to convert agricultural land to urban use as the City grows. The General Plan implements this strategy in part by identifying several Focused Growth Areas to which modified development standards or zoning requirements are applied. The purpose is to catalyze infill and intensified commercial, residential, and mixed-use development, most notably in Focused Growth Areas such as north and south Main Street, Abbott Street, East Alisal Street and East Market Street, south of John Street, Chinatown, and the Downtown area.

The EDE supports the General Plan city-centered land use strategy through policies that promote economic development within Focused Growth Areas and within additional commercial areas and neighborhoods where investments have not kept pace with those made or planned in other parts of the City. EDE goals, policies, and actions are designed to improve economic diversification and support business expansion through focused land use planning, targeted circulation, utility infrastructure improvements, and expanded resource availability.

To demonstrate how the EDE supports the General Plan land use strategy of achieving a balance between infill and demand for new land capacity, the City prepared an inventory of
vacant land and developed but unoccupied/underdeveloped land within the city limits using its Geographic Information System. The “developed but unoccupied” land category includes parcels that are developed, but on which the prior business or use has ceased to be active. Underdeveloped land includes parcels that are not developed to or near the intensity permitted per the FARs that apply to their respective land use designations. Table 8, Inventory of Potential Infill Parcels within the City Limits, summarizes the results. Two parcel size categories were selected: 1) parcels from two to five acres; and 2) parcels five acres or more. As is described below, these two categories represent parcels sizes deemed potentially feasible to accommodate new development with notable employment generating potential.

Table 8  Inventory of Potential Infill Parcels within the City Limits

<table>
<thead>
<tr>
<th>Parcel Size</th>
<th># of Parcels</th>
<th>Acreage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.0 – 4.99 Acres</td>
<td>34</td>
<td>92</td>
</tr>
<tr>
<td>5.0 Acres and Above</td>
<td>12</td>
<td>122</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>46</strong></td>
<td><strong>214</strong></td>
</tr>
</tbody>
</table>

Source: City of Salinas 2017

While the City’s GIS system shows that these parcels are potentially available for infill development consistent with their General Plan land use designations and as evaluated in the General Plan EIR, it is possible that availability of a subset of them could be constrained by site specific factors that could only be identified through a parcel by parcel analysis.

As shown in Table 12 of the Salinas Economic Development Element Target Industry Analysis (Appendix C in Volume II of the EDE) approximately 24,657 of the total of 45,500 (54 percent) new jobs needed at General Plan buildout are assumed to be generated through new institutional and visitor-serving development. For purposes of evaluating potential impacts of implementing the EDE, all of the land demand for new institutional and visitor-serving uses is assumed to be met within the city limits on vacant parcels, developed but underutilized parcels, and through revitalization/redevelopment of existing developed commercial areas consistent with land use strategy contained in the General Plan.

As can be seen in Table 8, about 214 acres of vacant and/or developed but unoccupied land within the city limits is comprised of parcels greater than two acres. While numerous vacant/underutilized parcels of less than two acres exist within the city limits, for purposes of this discussion, it is assumed that two acres is an average minimum size to accommodate new visitor-serving uses such as hotels. Five-acre minimum parcels are assumed to be sufficient to accommodate larger institutional type employment centers. Numerous variables including size/configuration, location, adjacent land uses, improvement/infrastructure costs, ease of access, visibility, etc., influence the economic feasibility of developing these parcels.
Though highly unlikely, even if all 214 acres were assumed to be available and feasible for infill development, significant land demand for new institutional and visitor-serving development remains. This deficit could be incrementally reduced if development of a subset of parcels of less than two acres was assumed to be economically feasible. Nevertheless, it is clear that significant land capacity is needed within the city limits to accommodate new job generation within the institutional and visitor-serving sectors.

As identified in the General Plan, infill development and revitalization/redevelopment of a significant acreage of existing developed land, e.g. Focused Growth Areas, is projected to be a key source of the additional land capacity, as is the revitalization of other existing commercial and neighborhood areas. The EDE supports and reinforces this General Plan strategy. In summary, for the City to meet employment needs through General Plan buildout, aggressive pursuit of infill development on vacant/underutilized parcels and aggressive revitalization of existing developed areas is needed, as is additional land capacity to support new employment generation as proposed in the EDE.

**New EDE Development Capacity**

After maximizing allocation of new land capacity demand to infill development, a balance of land capacity needed for new employment generation still exists. Existing urban infill opportunities for larger employment centers/aggregations of employment generating business are highly limited and are generally constrained due to a host of variables. The Target Areas contain sufficient land area to accommodate the balance of employment generating development that cannot be accommodated physically, functionally or financially within the city limits, or physically within the existing SOI. The Target Areas also represent development location options that are not currently available to the City for attracting new businesses. The Target Areas are generally located where new development would be compatible with existing adjacent or planned urban development and adjacent to existing urbanized areas within the SOI where existing infrastructure can be logically extended.

This EIR assesses the potential environmental impacts of future development based on the total new development capacity solely within the Target Areas that would be made possible with approval of the EDE general plan amendment. The total new development capacity consists of that proposed within the Target Areas located outside the SOI as summarized in Table 7 plus the new development capacity as shown in Table 5 within the Target Area for EOA V - Carr Lake. The total is summarized in Table 9, Total New EDE Development Capacity.

This EIR evaluates the potential environmental impacts of future development within the 558 acres contained within the Target Areas. A potential total of 5,255,959 square feet of new building potential is assumed within the Target Areas.
### Table 9 Total New EDE Development Capacity

<table>
<thead>
<tr>
<th>Location</th>
<th>New Land Supply (gross acres)</th>
<th>New Building Capacity (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Areas Outside the SOI</td>
<td>443</td>
<td>4,445,511¹</td>
</tr>
<tr>
<td>Target Area within EOA V - Carr Lake</td>
<td>115</td>
<td>810,448</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>558</strong></td>
<td><strong>5,255,959</strong></td>
</tr>
</tbody>
</table>

Source: ADE 2015 and EMC Planning Group 2016

Note: ¹Total building square footage differs from Table 5 total building square footage due to rounding.

In addition to analysis conducted in this program/first tier EIR, all individual future development projects proposed within the Target Areas will undergo CEQA review. The type of CEQA analysis required for each project would be determined at the time each is proposed. As described in Section 1.2, Type of EIR, if a future proposed project may have environmental effects that were not wholly examined or adequately addressed in this program EIR, a project-specific initial study would be prepared pursuant to CEQA Guidelines section 15060. The analysis in the initial study would lead to a determination about whether no further environmental review is required, or whether a negative declaration/mitigated negative declaration or an EIR may be required.

**Employment Generation**

The total EDE development capacity shown earlier in Table 8 represents the amount of new building development needed to accommodate new businesses which generate the requisite jobs to meet the City’s long-term employment needs through buildout of the General Plan. To determine the approximate number of new jobs that could be generated solely from new development within the Target Areas, the employment density factors of 1,000 square feet of building per job for industrial uses, of 550 square feet of building per job for commercial/retail uses, and 450 square feet of building per job for business park uses were applied to the building square footages shown in Table 6. Table 10, Projected Jobs Generated within Target Areas, summarizes the results. This information is used in the analysis of environmental impacts included in Section 3.0.

**New Infrastructure**

The EDE includes policies and programs for expanding circulation and utility infrastructure to support new economic development. Generally, the types and locations of specific infrastructure improvements that may be needed are not identified in the EDE, but would be defined at the
time future specific development projects are proposed. This includes EDE policies that call for the relocation/extension of two major road bypasses already identified in the General Plan.

### Table 10  Projected Jobs Generated within Target Areas

<table>
<thead>
<tr>
<th>Target Area Land Use</th>
<th>Building Capacity per Land Use Type (Building Square Feet/Job)</th>
<th>Projected Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial</td>
<td>1,502,820</td>
<td>1,503</td>
</tr>
<tr>
<td>Retail</td>
<td>2,193,448</td>
<td>3,988</td>
</tr>
<tr>
<td>Business Park</td>
<td>1,570,338</td>
<td>3,490</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>8,981</td>
</tr>
</tbody>
</table>


Note that the General Plan term “bypass” that was given to these two facilities has been replaced in the EDE with the term “expressway”. The term “bypass” was used in the General Plan to denote the purpose of the roadways (to bypass congested areas of the City). The term expressway is used in the EDE to denote both the updated purpose of these roadways as well as their proposed functional roadway classification. The impacts of constructing and operating the portions of the Westside Expressway and the Eastside Expressway proposed in the General Plan were evaluated in the General Plan EIR.

As discussed above, the Eastside and Westside expressway extensions and the new Southside Expressway were shown in the EDE as conceptual and initial technical studies were prepared including these roadways. However, since these extensions and new Southside Expressway are conceptual, and because the EDE does not propose to place them in the Circulation Element of the City’s General Plan, the actual construction of such possible future facilities is not reasonably foreseeable, and no analysis of the potential impacts of such potential construction is included in this EIR. Future planning decisions and separate environmental clearance/review will be needed to determine whether the City ultimately makes policy commitments to proceed with the expressways.

### Housing, Population Growth, and Job/Housing Balance

Implementation of the EDE would not result in development of new housing. New development capacity not contemplated in the General Plan is proposed within Target Areas to generate jobs to meet the demands of population growth that is already projected to occur in the City through buildout of the General Plan. Consequently, the EDE is not anticipated to result in new population growth.
The "jobs-to-housing" balance concept is rooted in the notion that when available jobs are balanced with the number of people in the workforce in a community (as represented by housing units), the local demand for jobs can largely be met within the community. This reduces need for employees to travel outside the community for work, which in turn reduces the number and length of employment related vehicle trips taken by local residents. Communities ideally become less auto dependent and adverse effects of auto dependence (e.g. traffic congestion, increased air pollution, increased generation of greenhouse gases, increased noise, etc.) are reduced. The jobs-housing ratio thus can be used as a general indicator of a community's auto reliance and its livability which further enhance the community's quality of life, a key objective of the EDE.

Current trends show that more than half of the workers who live in Salinas commute out of the City for employment. This strongly suggests that the current balance between job availability and the number of residents in the workforce is too low. This occurs due to the lack of available jobs, but also due in part to a mismatch between the types of jobs available in the City and the skills of many residents. The residents who commute out of the City tend to be younger than the residents who have jobs in Salinas, and they are employed more often in trade and transportation businesses. Additional jobs are needed in the City to meet employment needs of existing residents and from population growth in the City through buildout of the General Plan.

With a goal to expand land capacity for job-generating uses, implementation of the EDE would result in a better match between the number of available jobs in the City and the number of City residents in the labor force. It would also expand the diversity of available jobs. As a result, the number of residents that commute out of the City on a daily basis could decline. This potential change would have the types of positive environmental effects noted above and support the EDE objective of fostering long-term prosperity and quality of life.

Specific Plans to Guide New Development Enabled By the EDE

As is reflected in the proposed amendment to the 2002 General Plan, the Target Areas will be defined as new Future Growth Areas. Existing Future Growth Areas are described in the General Plan. Specific plans must be prepared for new development projects proposed within Future Growth areas. The specific plans will specify the ultimate distribution, location, and intensity of land uses in Target Areas consistent with the total development capacities described in this EIR for each Target Area.

2.5 Proposed General Plan Amendment

The City will be considering a package of general plan text and figure amendments needed to adopt the EDE and to integrate it into the existing General Plan. The proposed text and figure amendments are summarized below.


**General Plan Amendment to Adopt the EDE**

The City Council accepted the draft EDE as a strategic planning document in June 2014. Prior to formally adopting the EDE, the City Council must first comply with CEQA by certifying this EIR. The City Council would then formally act to consider approving a general plan amendment to adopt the EDE. With that approval, the EDE would become a new element of the General Plan.

**Additional General Plan Text and Figure Amendments**

The City has also determined that changes and/or additions to text, tables, and graphics in the existing General Plan are needed to integrate the EDE into the overall General Plan. The full set of these “integrative” amendments can be found in Appendix D, located on CD on the inside back cover of this EIR and can be found via link on the City's website. The most substantive of the amendments are text, figure and tables in the General Plan Land Use Element. These identify and integrate the Target Areas and associated land use into General Plan Figure LU-3A and incorporate additional potential development capacity proposed in the EDE through inclusion of new tables and amendment of existing tables. Of particular note is an amendment to existing General Plan Table LU-3, General Plan Development Capacity. This amendment reflects how total development capacity would increase through General Plan buildout with adoption of the EDE. General Plan amendments also include text changes to the Community Design, Housing, Conservation/Open Space, Circulation, and Safety Elements referencing policies in the EDE.

The General Plan amendments needed to integrate the EDE into the overall General Plan would not have direct or indirect impacts that are not already addressed in this program EIR.

**2.6 EDE Consistency with the 2002 General Plan and Other Applicable Regional Plans**

**Consistency with the 2002 General Plan**

The Salinas General Plan states the City’s vision for the community’s future and outlines goals, policies and implementation measures to achieve its vision. The General Plan also projects the population, dwelling units, and non-residential building square footage associated with the future buildout of the Land Use Plan, also referred to as General Plan buildout. Typically, General Plan buildout is decades beyond the 20-year General Plan planning cycle.
As described in CEQA Guidelines section 15125(d), an EIR must discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Such regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan, area-wide waste treatment and water quality control plans, regional transportation plans, regional housing allocation plans, regional blueprint plans, plans for the reduction of greenhouse gas emissions, habitat conservation plans, and natural community conservation plans.

As described in Section 2.5 above, text, table, and graphic changes needed to integrate the EDE content into the 2002 General Plan have been identified and are included in Appendix D. As part of the integration process, the EDE content was evaluated against the existing General Plan content to determine whether the EDE conflicts with existing General Plan policies.

One inconsistency with the existing General Plan has been identified. Land Use Element Policy LU-2.1 reads as follows:

Minimize disruption of agriculture by maintaining a compact city form and directing urban expansion to the North and East, away from the most productive agricultural land.

Target Areas N, B, and F are located to the south and southeast. These Target Areas are located on productive farmland adjacent to the City. Hence, the EDE would be inconsistent with this policy. One of the General Plan amendments consists of a modification of policy LU-2.1 to address this inconsistency. The modification reads as follows (with changes noted in underlined text):

Policy LU-2.1: Minimize disruption of agriculture by maintaining a compact city form and directing urban expansion generally to the North and East, away from the most productive agricultural land, except for employment generating development within Target Areas identified in the EDE. The EDE Target Areas represent new Future Growth Areas.

**Consistency with Applicable Regional Plans**

Applicable regional plans are described for each environmental topic evaluated in Section 3.0, Analysis, Impacts, and Mitigation. Where applicable, each topic-specific environmental setting section subsection includes information from applicable regional plans and each regulatory setting subsection includes a description of applicable regional plans. Where the proposed project is potentially inconsistent with the direction, policies, and/or regulations contained in an applicable regional plan, this is so noted in the discussion of potential impacts in each section.
Where a plan inconsistency is considered indicative of a significant environmental effect, mitigation measures are then identified to reduce project impacts to less than significant where feasible.

The General Plan EIR addresses environmental impacts of development within the SOI as envisioned in the General Plan Land Use and Circulation Policy Map and in General Plan policies and programs. EDE policies and actions that would create effects similar to those already assumed to occur with General Plan buildout as addressed in the General Plan EIR are not included in Table 1. The policies and actions in Table 1 have potential to create new or intensified impacts that were not evaluated in the General Plan EIR. These impacts are most likely to result from new employment-generating development within the proposed Target Areas proposed in the EDE.

Most of the policies and actions in Table 1 are found in Section 2.2.1, Land Use, Circulation, and Infrastructure of the EDE. They provide direction for new land and infrastructure development which commonly has potential to result in adverse environmental impacts. Several policies and actions with this potential are also found under other EDE topic headings.

City/County Greater Salinas Area Memorandum of Understanding

In 2006, the City and the County adopted the Greater Salinas Area Memorandum of Understanding (GSA MOU) to allow for annexation and development of specific parcels that are located outside of the Future Growth Areas as illustrated in the General Plan. These areas were not contemplated for annexation and development at the time the General Plan was adopted. These areas include, but are not limited to the “Unikool”, Boronda Road, and Fresh Express sites. These are represented in the EDE as EOAs A, M, and the eastern portion of N, respectively.

The GSA MOU describes the intent of each agency to consider annexation of the subject growth areas and identifies framework conditions under which annexations could be considered. The following excerpt from the Preface of the GSA MOU identifies its general intent:

This Memorandum of Understanding (MOU), by and between the County of Monterey (County) and the City of Salinas (City), is to set forth certain agreements between the parties to express their intent to jointly pursue action to assure orderly and appropriate land use development in the area designated in the General Plan of Monterey County as the Greater Salinas Area Plan area and in the City of Salinas. Specific objectives to be achieved through the implementation of the land
use and associated policies included in this MOU are the preservation of certain agriculture land, the provision of future growth areas, and the provision of adequate financing for the services and facilities of benefit to the residents of the Greater Salinas Area Plan area and the City.

With the adoption of the GSA MOU, both the City and the County acknowledged that additional development outside the City's Future Growth Areas would be considered subject to amendment of the City's SOI and annexation of such areas to the City. The GSA MOU also includes a set of points of agreement that govern future annexations and associated development. Among other topics, the points of agreement address the future direction of City growth, agricultural mitigation, traffic impacts, and storm drainage. The GSA MOU states that the direction of future growth of the City shall be to the north and east of the current city limits, except as otherwise provided for in the GSA MOU.

The EDE includes new development capacity within the Target Areas located in unincorporated areas that has not been previously contemplated by the City or the County. Therefore, the City's interest in amending its SOI to include the Target Areas and to annex one or more of them over time is not addressed in the GSA MOU. As the GSA MOU addresses City and County coordination on planning and development of unincorporated areas adjacent to the City, the City will need to collaborate with the County to amend the GSA MOU to reflect the City's future intention to annex and develop these areas. This is especially true given that the EDE could ultimately pave the way for development that could be inconsistent with the future direction of City growth identified in the GSA MOU. At such time that future development is proposed in the Target Areas, the City and County would also coordinate with LAFCO regarding GSA MOU amendments given LAFCO's discretion over SOI changes and changes of organization including annexations and associated attachments and detachments from the boundaries of special districts.

Agricultural land conservation, traffic, and utilities topics addressed in the GSA MOU are described in the applicable environmental topic sections of in Section 3.0, Analysis, Impacts, and Mitigation.

To address the potential inconsistency of portions of the proposed project with the GSA MOU, alternatives to the proposed project have been developed. Please refer to Section 6.0, Alternatives 2 and 3, for a description and evaluation of these alternatives.

2.7 PROJECT DESCRIPTION BACKGROUND

When initially released for public review in 2014, the draft EDE identified the general locations of conceptual EOAs. These EOAs encompassed existing developed areas within the city limits,
developed and undeveloped areas outside the city limits, but within the existing SOI, and undeveloped areas located outside the existing SOI. Many of the economic development strategies and policies include approaches for enhancing economic development within the EOAs.

Subsequent to the City Council’s acceptance of the draft EDE as a strategic planning document in June 2014, a more detailed analysis of the EDE land use direction was conducted. The analysis included refinement of EOAs, calculation of acreages, assignment of land use designations to the areas located outside the City’s existing SOI, and calculation of new vacant land/development capacity needed to meet projected long-term employment demand.

This further analysis of the EOAs found that only relatively small portions of five EOAs located outside the SOI and one EOA located within the city limits are needed for new land supply as the entire acreage within the boundaries of the EOAs is much greater than required to support the requisite additional job-generating economic development projected at General Plan buildout. These smaller areas of new land supply were termed “Target Areas”. The Target Areas represent locations where additional new job generation development beyond that envisioned in the General Plan could occur in the foreseeable future. Because development of the Target Areas is considered reasonably foreseeable, this EIR includes analysis of the environmental impacts of such development.

The remainder of the five EOAs located outside the SOI within which Target Areas are also defined was defined as an “Economic Development Reserve Area”. These are locations where the City might contemplate new growth beyond the General Plan buildout timeframe. Development of the Economic Development Reserve Areas is not reasonably foreseeable. Therefore, this EIR does not include analysis of the environmental effects of their future development. Information regarding the Economic Development Reserve Areas is included in the technical studies attached as appendices for disclosure purposes, not because any development is reasonably foreseeable within those areas.

The draft EDE also includes concepts for extending two roadways already planned for in the General Plan and for constructing a new roadway. The overarching purpose of the new roadways, identified as “Expressways”, is to improve transportation efficiency and through so doing, improve the attractiveness of the City as an investment destination for new job generating development. EDE policies provide direction to identify precise locations for the roadways, develop a funding mechanism for them, and conduct additional CEQA review.

Analysis of the Expressways was initially included in technical studies prepared for this EIR. Through subsequent analysis it was determined that the Expressways, being conceptual in nature and not being proposed for inclusion in the Circulation Element, are not reasonably foreseeable.
and are therefore presented in the EDE as future strategy to be considered in subsequent General Plan updates. For this reason, no analysis of the potential impacts associated with constructing or operating the Expressways is included in this EIR.

The elimination of the expressways from preliminary analysis required additional technical analysis by Fehr & Peers regarding traffic impacts of the EDE and by Rincon Consultants, Inc. regarding air quality, greenhouse gas, and noise impacts of the EDE, which are included in subsequent chapters and referenced when applicable.

### 2.8 Required Discretionary Approvals

In accordance with CEQA Guidelines section 15124(d), a list of approvals for which this EIR will be used is provided as is an illustrative list of agencies that may use this EIR in their decision making regarding future project specific developments that may be proposed consistent with the EDE general plan amendment. These lists include information that is currently known to the lead agency.

**List of Approvals**

**City of Salinas**

The proposed project is a General Plan amendment to adopt the EDE and modify existing General Plan text, figures, and tables.

**LAFCO**

A responsible agency is a public agency which has discretionary review approval power over a project (CEQA Guidelines Section 15381). LAFCO is a responsible agency. Approvals required from LAFCO to enable future development within individual Target Areas outside the current SOI include:

- Sphere of Influence Amendments;
- Annexations; and
- Service District Attachments/Detachments.

Future development projects proposed within Target Areas would be subject to analysis for their consistency with LAFCO SOI and annexation policies, including policies related to the logical expansion of urban boundaries and logical expansion of urban services and utilities. These
policies are identified in LAFCO’s Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization (Monterey County Local Agency Formation Commission 2013). The consistency analysis would occur as part of the LAFCO application and CEQA processes conducted for these future individual projects. An overview of policies and procedures with which consistency of future individual projects would be assessed is included in Section 3.15, Effects Found Not to be Significant. Provided the CEQA documentation prepared by the City for each future development proposal meets LAFCO content requirements, LAFCO would utilize the documentation to meet its independent CEQA compliance requirements associated with consideration of an SOI amendment, annexation, and special district attachment/detachment request for the development proposal.

**Other Responsible/Trustee Agencies**

A trustee agency is a state agency that has jurisdiction by law over natural resources affected by a project which are held in trust for the people of the state (CEQA Guidelines Section 15386). Additional responsible and trustee agencies that may have discretionary review authority or authority over resources that may be affected by future development within the Targets Areas and construction may include, but may not be limited to:

- California Department of Transportation;
- California Department of Fish and Wildlife;
- California Department of Toxic Substances Control;
- Central Coast Regional Water Quality Control Board;
- California Department of Conservation;
- Monterey County Local Agency Formation Commission;
- Monterey County Water Resources Agency;
- Monterey Bay Air Resources District;
- Transportation Agency for Monterey County;
- Association of Monterey Bay Area Governments; and
- Monterey County
Federal Agencies

It is also possible that certain federal agencies, in considering future development within the Target Areas, may use this EIR, at least in part, in order to assist with their compliance with the National Environmental Policy Act, the federal analogue to CEQA. These federal agencies may include the following:

- U.S. Army Corps of Engineers;
- U.S. Fish and Wildlife Service; and

Future Projects

Subsequent to the City’s adoption of the EDE and related General Plan amendments, individual project developers may propose specific projects within one or more of the Target Areas. To enable these projects to proceed, the City would consider project-specific entitlements and approvals. In addition, other agencies such as Responsible Agencies, Trustee Agencies, and federal agencies may have approval authority over future development. The approvals for which this EIR may be utilized include, but may not be limited to: Sphere of Influence amendments, annexations, pre-zoning, General Plan amendments, specific plans, subdivisions, and use permits/site plan approvals.

All individual future development projects proposed within the Target Areas will be reviewed to determine their individual CEQA compliance requirements. The type of CEQA analysis required would be determined at the time a project is proposed. As described in Section 1.2, Type of EIR, if a future proposed project may have environmental effects that were not wholly examined or adequately addressed in this program/first tier EIR, a project-specific initial study would be prepared pursuant to CEQA Guidelines section 15060. The analysis in the initial study would lead to a determination about whether no further environmental review is required, or whether a negative declaration/mitigated negative declaration or an EIR may be required.
3.0
ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

This section of the EIR contains analysis of the individual environmental effects of the proposed project. Each subsection includes analysis of a specific environment effect. Each subsection includes the following: discussion of the environmental and regulatory setting (local, state, and federal regulations) applicable to each environmental issue, analysis of the environmental impacts of the proposed project, and mitigation measures to avoid or reduce environmental effects.

3.1 AESTHETICS

The aesthetic value of a site whose character would change as a result of new development can be considered a function of its visual character and quality as perceived by an observer. The proposed project will alter the existing visual character of each Target Area by converting existing agricultural land to urban uses. This section of the EIR evaluates this issue, as well as visual effects related to scenic vistas, scenic highway corridors, and lighting.

Information in this section is derived from the General Plan EIR and from field analysis and observation. The issue of project effects on visual resources was not raised in responses to the NOP.

Determinations of significance for visual effects are inherently subjective. Interpretations of existing conditions or changes in existing conditions brought about by a proposed action are subject to the perceptions and sensitivities of the analyst or the viewer experiencing the change. The analysis in this section is a good-faith effort to objectively identify the existing aesthetic setting and changes in that setting resulting from future development of the Target Areas.
Environmental Setting

Regional Visual Setting

The City lies at the northern end of the approximately 70-mile long Salinas Valley. The visual setting within the Salinas Valley is dominated by open space views comprised of agricultural land and the Gabilan and Santa Lucia mountains that border the valley. These features represent the primary scenic resources within the County. The cities of Salinas, Gonzales, Soledad, Greenfield, and King City, along with areas of concentrated urban development within unincorporated areas of the County (e.g. Chular), represent urban islands intermittently dispersed along the Salinas Valley floor. The most dramatic changes in visual resource conditions occur at the urban/agricultural edges of these urban areas where agricultural fields abruptly give way to urban development. Because Salinas is the largest city in the County, and is surrounded by land in agricultural use, the visual interface with surrounding agricultural land is extensive.

Public views of the dominant rural agricultural landscape and mountains bordering the Salinas Valley lands are most common from highways that traverse through the valley. In the vicinity of Salinas, U.S. Highway 101, which extends the full length of the valley, is the most heavily traveled of the highways. It affords travelers sweeping views of agricultural and mountain landscapes and views of the urban/agricultural fringe at the margins of the southern and northern approaches to Salinas. State Route 68 and State Route 183 also provide travelers with similar views, though each is less heavily traveled than U.S. Highway 101.

Visual Setting in the Vicinity of and Within Target Areas

The Target Areas are proposed as destinations for new employment-generating development that were not previously contemplated in the General Plan. Target Areas B, N, L2, K, and F are distributed around the margins of Salinas outside the SOI, while Target Area V is located within the city limits. Please refer back to Figure 6, Target Areas and Economic Development Reserve Areas for reference.

The five Target Areas located outside the SOI are currently in agricultural use. They contribute to the agricultural, rural visual quality that is dominant in the vicinity and Salinas Valley. All but the 10 acres within Target Area F are located adjacent to existing urban development within the city limits (Target Areas N and L2) or adjacent to developed uses within unincorporated Monterey County (Target Areas B and K). Target Area V within Carr Lake is also in agricultural use. It is part of the total of approximately 990 acres within the broader Carr Lake EOA, which remains as an “island” of agricultural use within the city limits that is surrounded by urban...
development. **Figure 7**, Existing Visual Setting of Target Areas N, B, and F, show existing representative views of these Target Areas. The photos are taken from viewpoints on the major roadways located adjacent to Target Areas from which the most frequent views of the Target Areas would be available. **Figure 8**, Existing Visual Setting of Target Areas K, L2, and V, show similar representative photos of these Target Areas.

**Factors in Identifying Changes in Visual Character**

**Target Area Visibility and Viewer Sensitivity to Visual Change.** The degree to which the Target Areas are visible to potential viewers from public viewpoints is fundamental for assessing the extent to which the proposed project would substantially alter visual character. If the Target Areas have limited visibility, the visual effect of converting those areas to urban use would be limited. The sensitivity of viewers to the change is also a key factor; if viewer sensitivity is low, the effect of visual change would be limited.

Visibility of each Target Area varies depending on the location of the viewer. Topography within each Target Area and in the immediate vicinity of the City is essentially level. Public roads adjacent to the Target Areas will be the most common locations from which views will be available. In general, there are no major public uses (e.g. recreational facilities, institutional uses, parks, etc.) located adjacent to the Target Areas or proposed roadways from which frequent views of any one or more of the Target Areas or proposed roadways are available. Therefore, visibility is described primarily in terms of views from adjacent or nearby public roadways.

The most frequent and open views to Target Areas B, F, L2, and K would be from U.S. Highway 101. The highway passes adjacent to each of these Target Areas and direct views to them would be readily available, though may be intermittently blocked by existing development, vegetation, or other roadside obstructions. The duration of views would be relatively short given the high speeds of motorists on the highway. View frequency would be high given the large number of daily vehicle trips on the highway.

Direct, unobstructed views to Target Area N would be most readily available from State Route 68 and Blanco Road, both of which pass adjacent to this Target Area. View duration would be longer given lower speeds on these roadways. Frequency of views would be moderately high given the volume of traffic on these roadways, especially Blanco Road.

Direct views of Target Area V would be most readily available from U.S. Highway 101, as it passes adjacent to this Target Area. Views would also be available from local public roads, including Sherwood Drive, Natividad Road, and East Laurel Drive. View duration from U.S. Highway 101 would be relatively short given high speeds on the highway, but relatively longer from local roads given lower speeds. Frequency of views would be high from U.S. Highway 101 and moderate from the local roadways relative to the highway.
Viewer Sensitivity. Viewer sensitivity to visual change is largely a function of how distinct new development within the Target Areas would appear relative to the existing form and pattern of the visual resources within Salinas (largely urban landscape) and adjacent to Salinas (largely agricultural/open space landscape). Sensitivity is also a function of viewer expectations about and concern for changes in visual character. If new development would be of a size or scale or design that significantly contrasts with existing visual setting conditions, it could be considered to substantially alter those conditions. Viewers may be highly sensitive to such change. This may be especially true for landscapes with a high degree of visual sensitivity that are able to accommodate a lower degree of visual change without resulting in a significant visual impact. The converse is also true - landscapes with lesser visual sensitivity are generally able to accommodate a higher degree of visual change without that change being perceived as significant.

Viewer sensitivity is also a function of a viewer's degree of exposure to the visual change. Exposure is comprised of both the duration and frequency of views to a modified landscape. These factors are briefly described above for each Target Area based on views from public roadways.

Light and Glare/Skyglow Conditions

A range of sources of daytime and nighttime glare are common in urbanized areas. Daytime sources of glare typically include reflection of the sun off of buildings, car windshields, and other highly reflective glass or metal surfaces. Nighttime lighting is the primary source of glare that adversely affects nighttime views and creates sky glow. Typical sources of nighttime glare include high-intensity lighting at playfields, lighting of commercial and industrial facilities, parking lot lighting, street lighting, and vehicle headlights. Nighttime lighting in Salinas is a significant source of skyglow.

Regulatory Setting

State

Caltrans State Scenic Highway Program. Caltrans administers the Corridor Protection Program as outlined in the Scenic Highway Guidelines (Caltrans 2008). According to these guidelines, development along designated state scenic corridors is subject to specific land use regulations and design standards. Scenic corridors consist of land that is visible from a scenic highway right-of-way and are comprised primarily of scenic and natural features. The local jurisdiction typically determines the characteristics and corridor boundaries, which can be based on topography, vegetation, viewing distance, and/or jurisdictional lines. Management of the scenic corridor occurs through the local Corridor Protection Program.
Figure 7
Existing Visual Setting of Target Areas N, B, and F

Salinas Economic Development Element Program EIR
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Figure 8

Existing Visual Setting of Target Areas K, L2, and V

Salinas Economic Development Element Program EIR
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There are no state-designated scenic highways in the immediate vicinity of Salinas. The nearest designated scenic highway is the segment of State Route 68 from State Route 1 to the Salinas River. This route ends approximately two miles from the nearest Target Area (Target Area N) and proposed roadway (Southside Expressway) identified in the EDE. State Route 1 from the San Luis Obispo County line to State Route 68, and State Route 156 from State Route 1 to U.S. Highway 101 are the other two state designated scenic highways in the County.

None of the roadways adjacent to or in the immediate vicinity of a Target Area or proposed roadway are designated as scenic highways by Caltrans; therefore, development of the Target Areas and roadways would not have potential to adversely affect scenic resources within a state scenic highway corridor.

**Local Plans and Regulations**

**City of Salinas General Plan.** The General Plan contains a range of policies that guide the City’s direction regarding maintaining visual resources and quality. These are as follows:

- **Policy CD-1.2:** Maintain Salinas as a city with sharply defined edges between urban use and surrounding agricultural activities.

- **Policy CD-1.3:** Maintain the distinction of the City’s urban/rural interface by using roadway segments and/or natural features and tree plantings to form the boundary between urban development and open space or agriculture.

- **Policy CD-1.4:** Use landscaping, design schemes and signing to improve the image and distinct identity of the City, its neighborhoods and its major gateways.

- **Policy CD-1.7:** Design City-owned land and U.S. Highway 101 right-of-way landscaping to make Salinas interesting and attractive as seen from the highway.

- **Policy CD-1.8:** Apply high-quality design standards to projects visible from U.S. Highway 101.

- **Policy CD-1.9:** Improve the appearance of land designated as Arterial Frontage.

- **Policy CD-2.2:** Minimize potential light and sound impacts of new development on surrounding areas.
Policy CD-2.8: Avoid large unlandscaped parking areas and blank building walls facing streets or adjoining properties.

Implementation Program CD-5: Review discretionary development proposals for potential aesthetics impacts per the California Environmental Quality Act (CEQA). The standards established in the Zoning Code, the City’s Design Guidelines, Landscaping Standards, Lighting Ordinance, Gateway Guidelines, the project’s incorporation of the Traditional Neighborhood Development (TND) characteristics, and the project’s potential to damage or block scenic resources and views will be used to determine the significance of impacts. If potential impacts are identified, mitigation in the form of project redesign (e.g. bulk, shadow/access to light, height, architectural details, lighting) will be required to reduce the impact to a level less than significant.

The General Plan does not include setting or policy information that defines the location of specific or broad scenic vistas that should be considered for protection as part of the development review or CEQA processes.

Urban/Agricultural Edges. According to the General Plan, a primary goal of the Community Design Element is to maintain sharply defined urban edges. The City works to preserve these edges by using roadway segments to form distinct boundaries between urban and agricultural uses. The City also uses natural features, tree plantings, and agricultural buffers to form the boundary between urban development and open space or agriculture to prevent incompatibilities between agricultural and non-agricultural land uses.

Visibility from U.S. Highway 101. General Plan policy CD-1.8 states the following, “apply high-quality design standards to projects visible from U.S. Highway 101”. There are several view corridors of the community visible from U.S. Highway 101. The General Plan outlines the following four primary views of the city available from U.S. Highway 101: agricultural views in the northern portion of the General Plan planning area; views of the Northridge Mall area, the Salinas Auto Mall, and Westridge Shopping Center; long vistas into Carr Lake; and views of potential office and commercial development in the central portion of Salinas (General Plan, page CD-13). As noted in the Environmental Setting section above, several of the Target Areas are directly visible from U.S. Highway 101.

Gateway Overlay Districts. The General Plan designates five “gateway” areas in the City (General Plan, page CD-11). These gateways areas are zoned Gateway Overlay Districts and are subject to stricter land use regulations and development standards. None of the Target Areas are located within a Gateway Overlay District, though Target Area N is located adjacent to one of the districts located at the South Main (State Route 68)/Blanco Road intersection. Though
Gateway Overlay District regulations do not apply to any of the Target Areas, the EDE complements the notion of sensitive design treatment at gateways to Salinas as described below.

**City of Salinas Municipal Code.** Regulations pertaining to development design that are applicable to the proposed project are found in several locations in Chapter 37, Zoning, of the municipal code. Article III, Base District Regulations, Division 3, Section 37-30.220, Design Standards, provides design standards specifically for commercial development. Article III, Base District Regulations, Division 5, Section 37-30.330, Design Standards, provides design standards specifically for industrial development. Additional regulations that are supplemental to the base district design standards are included in Article V, Supplemental Regulations Applying to All Districts. New development must be consistent with these guidelines and regulations. The guidelines and regulations promote development design that is sensitive to visual effects and aesthetics. The standards are intended to reduce adverse effects on visual quality. An overview of key design standards and regulations is provided below.

*Design Standards.* Article III, Base District Regulations, Division 3, Section 37-30.220, Design Standards, provides design standards specifically for commercial development. Article III, Base District Regulations, Division 5, Section 37-30.330, Design Standards, provides design standards specifically for industrial development. The design standards for each zone district address a range of design topics. The purpose of the guidelines for each district is as follows.

- **Commercial Districts:** These design standards are intended to assist the designer in understanding the city's requirements for high quality commercial development. These standards complement the development regulations contained in this division by providing good examples of potential design solutions and by providing design interpretations of the various regulations. These standards ensure the highest level of design quality while at the same time providing the flexibility necessary to encourage creativity on the part of project designers. The standards are also intended to promote commercial developments, which are pedestrian-oriented, safe, and reflect traditional neighborhood design principles.

- **Industrial Districts:** These design standards are intended to assist the designer in understanding the city's requirements for high quality industrial development. These standards complement the development regulations contained in this division by providing good examples of potential design solutions and by providing design interpretations of the various regulations. These standards ensure the highest level of design quality while at the same time providing the flexibility necessary to encourage creativity on the part of project designers.

As a note, the industrial district standards are most applicable to the IGC and IBP zoning districts (neither of which would be applicable within the project site boundary under the proposed project), but also apply to the IG zoning district primarily for those uses visible from
3.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

public rights-of-way and U.S. Highway 101. The industrial portions of the project site would be developed per the IG zoning and are visible from public rights-of-way and U.S. Highway 101, so the standards are applicable.

The standards address the following topics: design principles, site planning, architecture, landscaping, fences and walls, screening, roof treatments, parking and circulation, lighting (discussed in more detail below), and signage (discussed in more detail below).

Supplemental Standards. Chapter 27, Article V, Supplemental Regulations Applying to All Districts, includes development standards that are in addition to those found in the standards for each individual zoning district. These supplemental standards address the topics listed below that are relevant to the proposed project. The purpose of each set of standards is included to summarize how the standards address the aesthetic character of new development.

- Division 2, Parking, Loading, and Outdoor Lighting.

The purpose of this section is to: (a) Ensure that adequate parking and loading facilities, and outdoor lighting are provided for new land uses, and for major alterations and enlargements of existing uses in proportion to the need for such facilities created by each use; and (b) Ensure that off-street parking and loading facilities, and outdoor lighting are designed in a manner that will ensure efficiency, protect the public safety, and, where appropriate, insulate surrounding land uses from adverse impacts.

- Division 4. - Landscaping and Irrigation.

The purpose of this section is to establish landscaping and irrigation regulations that are intended to: (a) enhance the aesthetic appearance of development in all areas of the city; (b) reduce heat and glare generated by urban development; (c) minimize water use; (d) minimize impervious surfaces and meet federal, state and local water quality regulations such as the National Pollutant Discharge Elimination System (NPDES) permit requirements, and storm water development standards (SWDS); and (e) protect public health, safety, and welfare by minimizing the impact of all forms of physical and visual pollution, promoting natural surveillance, controlling soil erosion and runoff, screening incompatible land uses, preserving the integrity of neighborhoods, and enhancing pedestrian and vehicular traffic and safety.

Landscaping and required planting areas are to be installed in accordance with the standards and requirements of this section for all zoning districts.

Signage. Signage design can play a significant role in the aesthetic appearance of new development. The fundamental standards for signage are included in Chapter 37, Article V, Division 3. – Signs. Relevant standards related to the aesthetic appearance of new signage is included in Section 37-50.530 and summarized below.
Purpose. The purpose of this division is to establish uniform sign regulations that are intended to: (a) Implement the city's community design and safety standards as set forth in the general plan; (b) Maintain and enhance the city's appearance by regulating the design, character, location, number, type, quality of materials, size, illumination, and maintenance of signs; (c) Generally limit commercial signage to on-site locations in order to protect the aesthetic environment from the visual clutter associated with the unrestricted proliferation of signs, while providing channels of communication to the public; (d) Respect and protect the right of free speech by sign display, while reasonably regulating the structural, locational, and other non-communicative aspects of signs, generally for the public health, safety, welfare, and, specifically, to serve the public interests in traffic and pedestrian safety and community aesthetics; (e) Minimize the possible adverse effects of signs on nearby public and private property; and (f) Serve the city's interests in maintaining and enhancing its visual appeal for tourists and other visitors, by preventing the degradation of visual quality which can result from excess signage.

Regulations in Section 37-50.570 identify that a sign permit is required. The sign permit process is described as are criteria used to determine whether a sign permit will be issued. This assures that the City has the discretion to review signage to ensure it is consistent with City of Salinas Zoning Code standards that address its potential visual and aesthetic effects.

Signage regulations for commercial uses and industrial uses are contained in sections 37.30.220(p), Signs, and 37-30.330(m), Signs, respectively. These are general regulations that are implemented through the sign permit process described in Section 37-50.570.

**Lighting.** Lighting design is addressed in Chapter 37, Zoning, Article III, Base District Regulations, Division 3, Section 37-30.220(o), Design Standards, Lighting, provides lighting design standards specifically for commercial development. Article III, Base District Regulations, Division 5, Section 37-30.330(l), Design Standards, Lighting, provides lighting design standards specifically for industrial development. Additional lighting regulations are found Article V, Supplemental Regulations Applying to All Districts. All new development will be required to comply with these standards unless any are preempted by standards included in the specific plan. Their implementation is designed to reduce light and glare effects of new development. The key lighting related sections of the zoning code are summarized below.

- Article III, Base District Regulations, Division 3, Section 37-30.220, Design Standards, Commercial Use Lighting: (3) as a security device, lighting should be adequate, but not overly bright. All building entrances shall be appropriately lighted, and (4) all lighting fixtures shall be shielded to confine light spread within the site boundaries and reduce "sky-glow" impacts.
Article III, Base District Regulations, Division 5, Section 37-30.330, Design Standards. Lighting: (3) as a security device, lighting should be adequate but not overly bright. All accesses to buildings should be well lighted, and (6) All lighting should be shielded to confine light spread within the site boundaries and "sky-glow" impacts.

Article V, Supplemental Regulations Applying to All Districts, Division 1. – Special Regulations Applying to All Districts, Section 37-50.180(b): (1) From Glass. Mirror or highly reflective glass shall not significantly increase glare visible from adjacent streets and property or pose a hazard for motor vehicles; (2) From Roofs. Highly reflective roof surfaces shall be prohibited in the airport overlay district unless it can be demonstrated to the satisfaction of the deputy city manager or their designee, that such surfaces will not pose a hazard to aircraft; and (3) From Outdoor Lighting. Parking lot and security lighting in any district shall be shielded or directed away from any R or NU (NE, NG-1, or NG-2) district properties located within one hundred feet. Lighting for outdoor court or field games within three hundred feet of an R or NU (NE, NG-1, or NG-2) district shall require approval of a conditional use permit.

Section 37-50.480: Outdoor lighting shall employ cutoff optics that allows no light emitted above a horizontal plane running through the bottom of the fixture. Parking lots shall be illuminated to no more than an average maintained two and four-tenths footcandles at ground level with uniform lighting levels. All building-mounted and freestanding parking lot lights (including the fixture, base, and pole) shall not exceed a maximum of twenty-five feet (a maximum of forty feet in the IG district) in height in all districts. Illumination at an R or NU (NE, NG-1, and NG-2) district property line shall not exceed one-half footcandle maximum. Lighting adjacent to other property or public rights-of-way shall be shielded to reduce light trespass. No portion of the lamp (including the lens and reflectors) shall extend below the bottom edge of the lighting fixture nor be visible from an adjacent property or public right-of-way. A point to point lighting plan showing horizontal illuminance in footcandles and demonstrating compliance with this section shall be submitted for review and approval prior to issuance of a building permit.

Economic Development Element

The EDE contains policies and implementation actions that address visual resources related issues, particularly as they pertain to gateways to Salinas as considered in the EDE. Policies that relate to the Target Areas include the following:

Policy LU-1.8: Work with the County of Monterey to promote Firestone Business Park (Economic Opportunity Area B), as an economic development asset for the City and region as a whole.
Policy ED-C-2.4: Utilize highway gateways to the City, as identified in the General Plan, to welcome and inform travelers about the City’s identity and its commercial and tourism opportunities, as well as create a linkage to the key economic opportunity areas in the City.

Action C-2.4.1: Include the Blanco Road/Davis Road intersection as a gateway location in the General Plan.

Action C-2.4.2: Create gateway beautification and signage plans for all gateways to the City. The plans should include distinctive requirements for structures, lighting and landscaping, which shall be maintained, as appropriate, at all times by the City and private adjacent developments. A signage plan shall be developed that includes a distinctive signage design theme that is consistent across all gateway locations and can be replicated as or integrated into a broader, City-wide signage design themes for distinct districts and neighborhoods. Specify standards for signage content and design for informing travelers of the City’s attributes, including commercial services and tourism resources.

Action C-2.4.3: Modify the City’s Gateway Overlay District standards to integrate the gateway beautification and signage plans, as required under Policy ED-C-2.4.

Standards of Significance

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of aesthetics, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on the subject of aesthetics, or indeed on any subject addressed in the checklist. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- Have a substantial adverse effect on a scenic vista;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
3.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

- Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

In applying these criteria, the City is concerned only with visual impacts from public views, and not from private views. The City has discretion to make this distinction, and does so because requiring mitigation for impacts to purely private views would give private landowners a kind of power over land uses on adjacent or nearby properties that they do not enjoy under California law. (See Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal.App.4th 492-493, quoting Wolford v. Thomas (1987) 190 Cal.App.3d 347, 358, for the proposition that “California landowners do not have a right of access to air, light and view over adjoining property”.)

If any of these significance thresholds is not applicable to the proposed project, or if the proposed project would have no related impact, this conclusion is so noted, and no further evaluation regarding the effect is provided. The Appendix G checklist includes the following questions, which the City determined not to be relevant to the proposed project:

- Would the project have a substantial adverse effect on a scenic vista?
- Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

As described in the Environmental Setting section above, none of the Target Areas is within a state scenic highway corridor. There is thus no potential for the proposed project to substantially damage scenic resources within a state scenic highway corridor. Therefore, no further discussion of these issues is necessary.

**Analysis, Impacts, and Mitigation**

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

**IMPACT: DEVELOPMENT OF TARGET AREAS B AND K WOULD SUBSTANTIALLY MODIFY EXISTING VISUAL CHARACTER AND ADVERSELY AFFECT EXISTING SCENIC VIEWS/VISTAS (SIGNIFICANT AND UNAVOIDABLE)**

**Target Area B**

Target Area B occupies approximately 1.25 miles of frontage along the south side of U.S. Highway 101 and is a total of 147 acres. It is “bookended” with existing development; at the
north end by development at the Abbott Street/Harris Road intersection and at the south end by the Firestone Business Park. Development of this Target Area would convert farmland with inherent visual resource value to urban use. More importantly, such development would represent a significant linear expansion of the city’s existing urban form into agricultural land within Monterey County. Existing foreground views and vistas available from both southbound and northbound lanes of U.S. Highway 101 towards the expanse of agricultural land located to the south and west of Salinas and more distant views to the Santa Lucia Mountains would be blocked for a substantial distance when traveling on the highway. For travelers in the northbound direction, this view is likely to be especially sensitive. Under existing conditions, views of rural agricultural landscapes are largely unimpeded as travelers approach Salinas in the northbound direction. Existing views through Target Area B in the northbound direction are part of the continuum of such views that are available prior to approaching the existing city urban/agricultural fringe. Conversion of Target Area B to urban use would eliminate this view for a significant duration of time and for a high number of viewers. Views in the southbound direction may be considered less sensitive as viewers would have been passing through urban portions of Salinas prior to their approach to Target Area B where visual quality would be diminished. Urban development within Target Area B would represent a continuation of views with diminished quality. The aesthetic impacts from the proposed project would be significant.

Approximately 10 acres of Target Area B is shown in Figure 5 as being designated Retail. The land use concept for Target Area B is that the 10 acres could develop as retail in conjunction with future construction of a new U.S. Highway 101 interchange at Harris Road. Regardless of whether or not the interchange is constructed and regardless of the ultimate use of the 10-acre area, its conversion to non-agricultural use will result in the impact described above.

**Target Area K**

Target Area K Target occupies approximately 0.7 miles of frontage along the east side of U.S. Highway 101. Target Area K is a total of 132 acres. The southern boundary of the Target Area is adjacent to existing urban development in Salinas and urban type agricultural related uses are located along a portion of the west side of U.S. Highway 101 across the highway from Target Area K. Scattered residential dwellings are located between Target Area K and the highway.

Like Target Area B as discussed above, development of this Target Area would convert farmland with inherent visual resource value to urban use. Target Area K would represent a relatively significant expansion of urban development into existing farmland toward which expansive views are available from U.S. Highway 101. Existing foreground views and vistas available from both southbound and northbound lanes of U.S. Highway 101 towards the expanse of agricultural land located to the east of Salinas and more distant views to the Gabilan Mountains (available from the northbound lanes) could be blocked or otherwise significantly diminished. These views are likely to be sensitive for southbound travelers on the highway as continuous
views of open space and agricultural land area available prior to approaching Salinas and the change to an urban form and pattern would be abrupt. Conversion of Target Area K to urban use would eliminate this view for a significant duration of time and for a high number of viewers. Views in the northbound direction may be considered less sensitive, as viewers would have been passing through urban portions of Salinas where visual resource conditions are diminished prior to their approach to Target Area K.

The City will require that a specific plan be prepared for new development proposed within each Target Area located outside the SOI as described in Section 2.0, Project Description. Each specific plan will include design standards that can be used to sensitively treat new development within Target Areas B and K consistent with General Plan policies and with the EDE policy related to development at gateways to Salinas. Consistency of each individual project with specific plan design standards and with design standards in the zoning code will be assured through the project specific development review process. Nevertheless, these tools cannot be used to significantly lessen the impact of loss of important existing views of valuable visual resources in the form of agricultural landscapes and potentially of more distant mountain views. To many people, even the most tastefully designed development is a negative change compared with pre-existing open space. No mitigation is available that would substantially lessen the impact; the impact will occur by virtue of enabling development within the Target Areas. Therefore, the impact is significant and unavoidable for these two Target Areas.

**IMPACT: DEVELOPMENT OF TARGET AREAS N, L2, K, F AND V WOULD MODIFY EXISTING VISUAL CHARACTER AND ADVERSELY AFFECTS EXISTING SCENIC VIEWS (LESS THAN SIGNIFICANT)**

Future development of Target Areas N, L2, F, and V would result in conversion of agricultural land to an urban use. Because agricultural land is a prevailing visual resource within the Salinas Valley and at the margins of the city, the proposed project would result in incremental losses of visual resources in these Target Areas. However, these changes are not considered to be substantial for several reasons.

With the exception of Target Area F, the remaining Target Areas are located contiguous to existing urban development within Salinas. Their development would not result in a substantial change in the existing form and pattern of urban development at the city’s urban/agricultural fringe, or in the case of Target Area V, the form and pattern of urban development within the city. This diminishes the extent to which such development would create viewer perception of a major change in visual resource conditions relative to existing conditions and to the expansive views of agricultural land and more distant landscape features that would remain available from public viewpoints, particularly public roadways adjacent to the Target Areas. The changes would not be substantial, and the impact would be less than significant.
Target Area F is approximately 10 acres in size. The overall visual impact of converting a small site to urban use is typically minimal. However, Target Area F is not located adjacent to existing urban development, but rather is surrounded by expanses of agricultural land. Its development would not be consistent with the existing pattern of urban development in Salinas and at its margins. Lacking other countervailing circumstances, this change could be perceived as substantial in that it would interrupt views from U.S. Highway 101 towards expansive vistas of agricultural land. Target Area F was so designated in the EDE to capture new economic development opportunities that would accompany construction of a new U.S. Highway 101 interchange at this location (Harris Road). The preliminary concept for a new interchange at Harris Road has been evaluated by Caltrans, but detailed analyses have not been conducted and the interchange is not funded at this time. Target Area F would not be developed in the absence of the new interchange. Thus, its “opening day” condition would be one with an interchange in place. A new interchange would, in and of itself, introduce a significant urban form into the existing surrounding agricultural lands and significantly modify visual character in this area that is now characterized by expansive views of agricultural land available from U.S. Highway 101. Subsequent development of Target Area F would expand the urban development pattern created by the new interchange. But given the prior changes created by the interchange, urban development within Target Area F would not cause a substantial new change in visual resource conditions.

Loss of agricultural land/open space views within the Carr Lake area would occur with development of Target Area V. This change will be most notable for motorists traveling on U.S. Highway 101 as it passes this Target Area. However, the change would be consistent with the existing developed urban form within the City through which the highway passes. Viewer expectations of having access to views of agricultural land within a highly urbanized setting are not likely to be high and consequently, the sensitivity of viewers to the loss may not be high. Target Area V is a total of 115 acres, while EOA V in its entirety is nearly 1,000 acres. Therefore, views of the large balance of agricultural land and open space within Carr Lake would remain available for travelers on local City roadways located adjacent to this Target Area. Therefore, the change in visual character would not be substantial and the impact would be less than significant.

A specific plan will be required for future development planned within each Target Area, as each represents a new Future Growth Area as described in Section 2.0, Project Description. The specific plans will include design standards that complement the City’s existing design review process. The design standards and the design review process will be used as tools to treat development within the Target Areas to maximize its visual compatibility with existing urban development.
**IMPACT: DEVELOPMENT OF THE TARGET AREAS WOULD INTRODUCE NEW SOURCES OF LIGHT AND GLARE (LESS THAN SIGNIFICANT)**

Future development within the Target Areas will create new sources of light and glare. Due to the proximity of Target Areas B, L2, K, and F to U.S. Highway 101, if measures are not implemented to minimize the creation of substantial sources of light and glare and the casting of light and glare skyward and outside of the Target Areas, nighttime views from the highway and other areas could be adversely affected. Only Target Area V is located adjacent to light-sensitive residential uses.

Development within the Target Areas will include lighting in many forms that range from street and parking lot lighting to building, signage, and security illumination. The zoning code includes a variety of regulations and standards to reduce the impact of lighting as described in the Regulatory Setting section above. These standards address design standards specifically for industrial development, including lighting for security, minimizing reflective surfaces at the ground level, and avoiding roof treatments that generate glare. Section 37-3.330(l) provides specific lighting design standards. Article V, Supplemental Regulations, includes performance and design standards for uses within all zoning districts. Sections 37-50.180(b) and 37-50.480 include supplemental regulations pertaining to outdoor lighting; limiting glare from glass and roofs; shielding parking lot, security, and loading area lighting to limit its splay to off-site properties; and prohibiting lighting that could interfere with the operation of safe movement of vehicles. The design of lighting for new developments within Target Areas and for lighting of new roadways must be consistent with these regulations. Consistency with City of Salinas General Plan lighting policies and zoning code regulations will be assured through the City’s development review process for future individual projects proposed within the Target Areas.

Implementation of these uniform development standards will reduce potential lighting impacts from future developments within each Target Area such that glare and skyglow effects and potential lighting incompatibilities with adjacent land uses would be less than significant.

### 3.2 AGRICULTURE AND FOREST RESOURCES

This section of the EIR includes evaluation of agricultural resources within the proposed Target Areas. Issues regarding conversion of agricultural land to non-agricultural use, potential conflicts with agricultural land zoning, and potential for the project to cause incompatibilities with ongoing agricultural activities located adjacent to Target Areas are addressed.

Information in this section is derived from a variety of sources including:

- *City of Salinas General Plan Final Program EIR* (Cotton/Bridges/Associates 2002);
MONTEREY COUNTY IMPORTANT FARMLANDS MAP (CALIFORNIA DEPARTMENT OF CONSERVATION 2014) (DOC); AND

GREATER SALINAS AREA MEMORANDUM OF UNDERSTANDING (CITY OF SALINAS AND MONTEREY COUNTY 2006) (GSA MOU).

NOP responses that addressed agricultural issues were received from LandWatch Monterey County, Monterey County, MCWRA, LAFCO, and the Ag Land Trust. Comments stressed the importance of documenting potential loss of farmland and addressing the relationship of the proposed project to the City of Salinas and Monterey County GSA MOU. The GSA MOU includes agreements regarding conversion and preservation of farmland at the periphery of the City.

Environmental Setting

Agricultural Resources

The highly-productive agricultural lands surrounding Salinas create a distinct urban/agricultural edge and agricultural crops and related industries are a primary economic engine for the City and region. Salinas lies at the north end of the Salinas Valley, known as "The Salad Bowl of the World," and is the processing and shipping point for lettuce, broccoli, mushrooms, and strawberries, along with numerous other crops. The climate is also ideal for grape vineyards. Salinas is the processing and shipping point for one of the world's largest agricultural centers.

Salinas has historically been an agricultural community. While most of the land within the city limits has been developed into urban use, there are remaining parcels that continue in agricultural production, and agricultural land surrounds the city. These agricultural areas help to preserve the traditional rural character of the community, maintain visual open space, and provide substantial economic benefit to the community. However, as growth continues to occur, the expansion of urban uses into portions of the interior and surrounding agricultural areas will be necessary in part to provide adequate housing to meet the existing demand for housing for agriculture and agriculture-related workers and their families (City of Salinas 2002).

Several categories of agricultural products make up the vast majority of Monterey County farm production value. Vegetable crops are the single largest production category by dollar value, comprising 65 percent of the County total. Production on land within the Target Areas is comprised primarily of such product types. Lettuce dominated this category ($1.2 billion), followed by broccoli ($427 million), celery ($217 million), and spinach ($123 million). Fruit and nut crops represented the second largest category (26 percent) and consisted mostly of strawberries ($869 million) and wine grapes ($227 million). Together, these two major categories
accounted for 91 percent of the County’s direct farm production values, which were $4.38 billion in 2013. Nursery products provided an additional 13 percent of value with other products such as livestock and seeds supplying the remaining two percent (Agricultural Impact Associates 2015).

**Farmland Classifications – Target Areas.** Land in Monterey County is inventoried as part of the California DOC’s Farmland Mapping and Monitoring Program (FMMP) and is mapped on the *Monterey County Important Farmlands Map* (California Department of Conservation 2014). The land mapped is classified into several different categories including: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, and Other Land. Conversion of important farmland, which includes farmland in the first three classifications noted above, to a non-agricultural use, is a significant impact. The FMMP is described in more detail in the Regulatory Setting section below.

As shown on Figure 9, Farmland Mapping Classifications, the boundaries of the Target Areas encompass land classified as Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and/or Urban and Built-Up Land. County GIS data was utilized to estimate the acreage of each of the four FMMP land classifications within each Target Area. The results are summarized in Table 11, Target Area FMMP Farmland Classification Summary. The Target Areas within which new urban development is contemplated contain approximately 502 acres of important farmland comprised of one or more of the three noted classifications of agricultural land. All of this land is currently used for agricultural production or agricultural production related support uses.

The vast majority of the most valuable agricultural lands in the County, including those adjacent to Salinas and classified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, are located on the topographically level floor of the Salinas Valley. The valley floor is also subject to the highest rates of agricultural land conversion to non-agricultural uses due to its level topography and good drainage qualities that are favorable for expanding urban development.

**Land Uses Adjacent to the Target Areas.** The Target Areas were defined as destinations for additional employment-generating development in part due to their adjacency to existing urban uses. Development of such areas could be facilitated by the fact that they represent a logical expansion of the existing city limits and that City services and utilities can be logically extended to them. Each Target Area is adjacent to existing urban development on at least one side. In general, unincorporated land in agricultural use or agricultural support use that is generally classified as farmland is located adjacent to the remaining boundaries of each Target Area.
Farmland Mapping Classifications

- Prime Farmland (P)
- Farmland of Statewide Importance (S)
- Unique Farmland (U)
- Grazing Land (G)
- Urban and Built-Up Land (D)
- Other (X)

Source: City of Salinas 2014, Monterey County GIS Database 2010, Esri 2015

Figure 9

Farmland Mapping Classifications 2012

Salinas Economic Development Element Program EIR
Table 11  Target Area FMMP Farmland Classification Summary

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<th>Target Area Acreage</th>
<th>Farmland Acreage¹</th>
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<td>10 (P)</td>
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<tr>
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</table>

*Source:*  EMC Planning Group 2016

*Note:*  ¹Farmland Classifications include: P = Prime Farmland; S = Farmland of Statewide Importance; U = Unique Farmland

**Williamson Act Contracted Land**

The Williamson Act is described in the Regulatory Setting section below. Its purpose is to help preserve California’s prime agricultural lands from urbanization.

Several parcels of land within or immediately adjacent to the boundaries of two Target Areas are currently under Williamson Act Farmland Security Zone contracts. Farmland Security Zone contracts are for a 20-year period and automatically renew unless a request for non-renewal has been made by a party to the contract. Williamson Act contracted land in the vicinity of the City is identified in Figure 10, Williamson Act Contracts and Agricultural Conservation Easement Parcels. With two exceptions, the figure reflects the status of Williamson Act contracts as of 2012, the most current year for which information was available from Monterey County. The County approved two new contracts in 2015 – these are also included in the figure.

**Permanent Agricultural Conservation Easements**

The Ag Land Trust of Monterey County holds over 26,000 acres of agricultural conservation easements in Monterey. These easements were purchased with federal, state, and or local funds, as well as with private funds committed to this purpose, generally as CEQA mitigation for land development projects that have or would result in conversion of agricultural land to non-agricultural use. Many of these easements are over agricultural land, including land located within the vicinity of the City. Figure 10 shows the location of these easements. Land held under these easements is to be protected in perpetuity for the purpose enumerated in the easement documentation, including in most cases, the continuation of agricultural production.
**Forest Resources/Timberland**

The California Public Resources Code, Section 12220(g) defines forest land as "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” Section 4526 of the California Public Resources Code defines timberland as “land (other than land owned by the federal government and land designated by the California Board of Forestry and Fire Protection as experimental forest land) that is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.” There are no forest resources or timberlands located within any of the Target Areas. These areas are predominantly in agricultural production and/or agricultural support activity use.

**Regulatory Setting**

**State**

**California Farmland Mapping and Monitoring Program.** The DOC uses the Natural Resources Conservation Service soil classifications to classify agricultural lands under its FMMP. The FMMP was established in 1982 to assess the location, quality, and quantity of agricultural lands and the conversion of these lands. These designated agricultural lands are included in the Important Farmland Maps used in planning for the present and future of California’s agricultural land resources. The California Department of Conservation has a minimum mapping unit of 10 acres, with parcels that are smaller than 10 acres being absorbed into the surrounding classifications. The categories mapped by the California Department of Conservation are described below. In addition to mapping existing farmland, the Farmland Mapping and Monitoring Program provides analysis of agricultural land use changes throughout California.

Prime Farmland has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply necessary to produce sustained high yields. To be classified as Prime Farmland, the land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Farmland of Statewide Importance is farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. The land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
Figure 10

Williamson Act Contracts and Agricultural Conservation Easement Parcels

Salinas Economic Development Element Program EIR
Unique Farmland is farmland of lesser quality soils used for the production of the state’s leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. The land must have been cropped at some time during the four years prior to the mapping date.

**Williamson Act/Monterey County Implementation.** The California Land Conservation Act, otherwise known as the Williamson Act, was enacted by the State Legislature in 1965 as a means of preserving California’s prime agricultural lands from urbanization. (See Gov. Code, § 51200 et seq.) Prime Farmland under the Williamson Act includes land that qualifies as Class I and II under the NRCS classification of land. The Williamson Act involves voluntary contracts between landowners and a city or county in which the owners agree to retain their lands in agricultural or other open space uses. In return for entering into this contract, the landowners receive property tax relief on the lands under contract. This relief is provided through the assessment of lands based on their income-producing value rather than their market value, which may be considerably higher.

Williamson Act contracts may have a 10-year term or a 20-year term, the latter for a Farmland Security Zone (FSZ) contract. The contracts automatically renew each year on a common anniversary date of January 1 unless they are cancelled or a notice of non-renewal is given. If either party to a contract gives notice of non-renewal, the non-renewal process begins on the following anniversary with nine years remaining for a 10-year contract or 19 years remaining for a FSZ contract. During the remaining term of the contract after notice of non-renewal has been given, property taxes increase gradually according to a formula that eventually brings them up to the same level as non-Williamson Act lands.

In 1968, the first year after the Williamson Act was approved, the County approved 10-year Williamson Act contracts only. From 1969 to the present, the County has approved only 20-year FSZ contracts. However, many of the 10-year contracts remain in place (Phone conservation with Steve Mason, Monterey County Resource Management Agency, March 23, 2016).

Historically, local governments have received an annual subvention of forgone property tax revenues from the state via the Open Space Subvention Act of 1971. Beginning in 2009, the state suspended Williamson Act subvention payments. The DOC website states: “[T]he elimination of Open Space Subvention payments has occurred in recent years…. Despite the loss of OSS payments, participating jurisdictions may re-capture 10 percent of the property tax benefits that are provided to owners of LCA.” (California Department of Conservation 2016.)

The local government has the discretion to determine uses compatible with Williamson Act enrollment (Government Code §51238-51238.1). Government Code Section 51201(e) requires that for a use to be compatible with Williamson Act enrollment, it must not disrupt the purpose of the Williamson Act contract, which is to primarily to preserve agricultural lands. According
to the DOC, a compatible use cannot significantly compromise the long-term productive agricultural capability of the land, displace an agricultural use, impair continuing agricultural uses on the site or adjacent contracted sites, nor lead to the loss of agricultural uses on adjacent lands (California Department of Conservation 2016).

The typical method for withdrawing from a Williamson Act contract is filling a notice of non-renewal, which can be initiated by either the contracting agency or the landowner. Contracts may also be canceled if it is determined to be in the public interest or consistent with the Williamson Act (Gov. Code, § 51282). Cancellation of Williamson Act contracts may only be initiated by the landowner, and must be approved by the City Council or County Board of Supervisors with land use jurisdiction over the site in question. The Council or Board must consider comments from the DOC before approving a tentative cancellation. Cancellation becomes final upon the completion of conditions of approval, including the payment of a cancellation fee to the DOC in the amount of 12.5 percent of the unrestricted fair market value of the land for the cancellation is sought (California Department of Conservation 2016). To approve a tentative cancellation on public interest grounds, the governing body of the contracting local agency must make specific findings. (Gov. Code, § 51282.)

Local Plans and Regulations

City of Salinas General Plan. The Conservation and Open Space Element of the City of Salinas general plan contains a range of goals and policies that are focused on conservation of agricultural resources. Illustrative policies include the following:

- **Policy LU-2.1:** Minimize disruption of agriculture by maintaining a compact city form and directing urban expansion to the North and East, away from the most productive agricultural land.

- **Policy COS-3.3:** Discourage the conversion of lands designated on the Land Use Map as Agriculture to non-agricultural uses.

- **Policy COS-3.4:** Minimize conflicts between agricultural and urban uses through the use of buffer zones, roads, and other physical boundaries.

Greater Salinas Area Memorandum of Understanding – Agricultural Land Mitigation. In 2006, the City and the County adopted the GSA MOU. The agreements made in the GSA MOU facilitate annexation and development of the City’s Future Growth Area located to the north and east as illustrated in the General Plan. The agreements also facilitate annexation of additional land, including the “Unikool” and Fresh Express sites located to the west and south of the City. These sites are represented in the EDE as EOA A and a portion of EOA N, respectively. These areas were not contemplated for annexation and development at the time the General Plan was adopted.
The GSA MOU describes the intent of each agency to consider annexation of the Future Growth Areas defined at that time and identifies framework conditions under which annexation could be considered. One of the conditions pertains to preservation of agricultural land that would be converted to non-agricultural use with development of the growth areas. With the adoption of the GSA MOU, both the City and the County acknowledged that additional development outside the City’s Future Growth Areas would be considered subject to amendment of the City’s SOI and annexation of such areas to the City. The GSA MOU describes that the direction of future growth of the City shall be to the north and east of the current city limits, except as otherwise provided for in the memorandum (exception included the Unikool and Fresh Express sites noted above).

The EDE includes new development capacity within Target Areas that was not contemplated, and therefore, not addressed in the GSA MOU. These include the EOAs B, F, K and N. All of these Target Areas include important farmland. Target Areas B, F, and N are located to the south of the City where the GSA MOU identified that no additional urban development (conversion of important farmland) should occur. If the City and County (in collaboration with LAFCO) agree to amend the GSA MOU to address new development within these Target Areas, mitigation of impacts from agricultural land conversion will need to be addressed.

**City of Salinas Agricultural Land Preservation Program.** To implement the Salinas General Plan and the GSA MOU, the City adopted an Agricultural Land Preservation Program (ALP) in April 2008. The City consulted the County as part of the ALP development process. The ALP supports implementation of key principles and mitigation measures expressed in the General Plan including:

- Cooperation with the County;
- Priority to Redevelopment and Infill projects;
- Right to Farm Notices;
- Buffers between Agricultural and Non-Agricultural Uses; and
- Agricultural Land Conservation Easement Program.

The ALP is designed to implement specific General Plan policies that would reduce pressure to convert agricultural land. The City also committed to implement a General Plan policy to work collaboratively with the County and other local jurisdictions to develop an agricultural conservation easement program. A collaborative effort to development such as program has not been undertaken to date. A GSA MOU agreement to require agricultural conservation easements for future development to the west and south of the City is also included. For development to the north and east of Highway 101 within the City’s Future Growth Area
described in the General Plan, the ALP does not require agricultural conservation easements. However, a mitigation fee of $750 per acre is required for conversion of agricultural land currently designated Prime Farmland or Farmland of Statewide Importance. For development of lands to the west and south of the City - payment of the fee is not a mitigation option. All other growth identified in the GSA MOU in areas to the south and west of U.S. Highway 101, including the Fresh Express annexation project area, the Westside Bypass area as generally shown on Exhibit C to the GSA MOU. Development in the County's former Boronda redevelopment project area is subject to its own separate environmental review and appropriate mitigation measures. The ALP also describes uses to which agricultural mitigation fees may be applied.

**City of Salinas Zoning Ordinance.** Section 37-50.220 identifies City obligations to preserve agricultural lands:

*Sec. 37-50.220. Right to Farm.* The City adopted Municipal Code Section 37-50.220 to demonstrate the City's support for the preservation of agricultural land and operations, limit the effects of land use conflicts created by the proximity of urban development to agricultural operations located in and adjacent to the city, and provide notice to purchasers, property owners, and tenants of nonagricultural property and uses of their proximity to agricultural land and operations that they may experience inconveniences and discomforts related to normal farming activities. As a condition of all discretionary review application approvals, the City requires specific deed restriction language to be recorded on any land located within one thousand feet of agricultural land, agricultural processing, or agricultural farming operations to notify any purchaser, property owners, or tenants of the right to farm.

**Proposed EDE Policies**

The EDE contains policies and implementation actions which directly or indirectly address potential loss of agricultural land and whose implementation may serve as mitigation for significant impacts. These include the following:

**Action LU-1.7.1:** Work with LAFCO, the County of Monterey, the Monterey County Agricultural Land Trust and other affected agencies and stakeholders to expand the City’s Sphere of Influence and Urban Service Area, as well as annex land areas to the City, for Economic Opportunity Areas B, F, K, L, and N.
Action LU-1.7.3: Work with Monterey County to revise the Greater Salinas Area Memorandum of Understanding and other related agreements such as tax transfer agreements, to address development on Economic Opportunity Areas located outside the City’s Sphere of Influence as identified in the Economic Opportunity Areas map.

Action LU-1.7.4: Through a local Agricultural Land Preservation Program, require agricultural conservation easements, where feasible, to protect the most productive agricultural lands such as but not limited to those adjacent to Economic Opportunity Areas B, F and N.

Action LU-1.8.1: Promote creative and innovative use of the Firestone Business Park site while protecting surrounding agricultural lands.

Policy ED-LU-1.12: Work with landowners to fund and develop a plan for future retail commercial development and job growth, and other land uses, as appropriate, at the south end of the City in Economic Area N while protecting adjacent productive farmlands and prohibiting additional expansion of urban uses.

Action LU-1.12.2: Work with the County of Monterey to update the Greater Salinas Area Memorandum of Understanding in order to implement the direction of Policy ED-LU-1.12.

**Standards of Significance**

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of agricultural resources, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on the subject of agricultural resource impacts, or indeed on any subject addressed in the checklist. (*Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (*Ibid.*) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- 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;
convert conflict with existing zoning for agricultural use, or a Williamson Act contract; or

- involve other changes in the existing environment which, due to their location or nature, could result in conversion of important farmland, to non-agricultural use.

The Appendix G checklist also inquires whether a proposed project would:

- 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 452), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)); or

- result in the loss of forest land or conversion of forest land to non-forest use.

These questions are irrelevant to the proposed project because, as described in the Environmental Setting section above, there is no forest land within the Target Areas. The proposed project thus would not conflict with existing zoning for forest land or timberland and would not result in the loss or conversion of forest land.

**Analysis, Impacts, and Mitigation**

The impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

**IMPACT: FUTURE DEVELOPMENT OF THE TARGET AREAS WOULD RESULT IN CONVERSION OF 502 ACRES OF IMPORTANT FARMLAND (PRIME FARMLAND, FARMLAND OF STATEWIDE IMPORTANCE, AND UNIQUE FARMLAND) TO NON-AGRICULTURAL USE (SIGNIFICANT AND UNAVOIDABLE)**

Future urban development within the Target Areas would result in the conversion of 502 acres of important farmland to non-agricultural use, as shown in Table 11, Target Area FMMP Farmland Classification Summary. This impact would be significant and unavoidable, as once converted to a non-agricultural use, reconversion of the land back to agricultural use is highly unlikely.

This impact can be partially mitigated with implementation of three EDE policy actions listed in the Regulatory Setting above that address the GSA MOU, and with implementation of the city’s agricultural land preservation requirements. A core element of the GSA MOU concerns
conversion of agricultural lands in unincorporated areas of the County as the city expands. The existing ALP targets agricultural land conversion mitigation, in large part to implement related agreements made in the GSA MOU. EDE Actions LU-1.7.1 and LU-1.7.3 suggest that agricultural conservation easements for important farmland conversion impacts resulting from development in Target Areas B, F, and N are appropriate given the location of these Target Areas. Similarly, Action LU-1.7.4 suggests that agricultural conservation easements could be a tool for protecting important farmland adjacent to Target Areas from future conversion to non-agricultural use.

The ALP will need to be updated to address future projects located with the proposed Target Areas. The existing ALP will continue to apply to those properties located with the Future Growth Areas as indicated in the City of Salinas General Plan.

There is no assurance that implementation of the above-noted EDE policy actions specific to farmland conservation would partially mitigate impacts of important farmland conversion. Implementation of the following mitigation measure provides this assurance. The impact would not be reduced to less than significant, as the conversion of important farmland to non-agricultural use is assumed to be irreversible. Implementation of the following mitigation measure would partially mitigate the significant impact, but not to less than significant. Therefore, the impact would be significant and unavoidable.

**Mitigation Measure**

**AG-1.** Developers of future projects within each Target Area shall provide mitigation for conversion of important farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) to non-agricultural use resulting from development within the Target Areas. At a minimum, mitigation shall include payment of an agricultural land conservation in-lieu fee in effect at the time individual projects are proposed within the Target Areas or dedication of a permanent conservation easement to a qualified third-party farmland conservation entity on off-site agricultural land of equal or better quality at a ratio of 1:1. If payment of an in-lieu fee is proposed by individual project applicants, the fee amount shall be based on the fair market value of permanent conservation easements on agricultural land at the time individual project applications are submitted. This amount may be updated, if necessary, at the time of project approval. The fair market value shall be identified through a nexus study or other mechanism approved by the City Attorney. The specific mitigation option to be implemented shall be identified in the CEQA documentation for future individual projects. Individual developers shall demonstrate compliance with the selected performance standard to the Community Development Director prior to issuance of a grading permit by the City.
3.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

**IMPACT: FUTURE DEVELOPMENT WITHIN TARGET AREA B AND TARGET AREA V WOULD CONFLICT WITH WILLIAMSON ACT CONTRACTS (LESS THAN SIGNIFICANT WITH MITIGATION)**

As illustrated in Figure 10, portions of Target Area B and Target Area V are located within the boundary of Williamson Act contracted land. Table 12, Williamson Act Contracted Parcels within Target Areas, shows the parcel numbers and contract periods for contracted land. This conflict with Williamson Act contracted land is a significant impact.

Table 12 Williamson Act Contracted Parcels within Target Areas

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Parcels Under Williamson Act Contract</th>
<th>Contract Period (Years)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B</td>
<td>177-132-003</td>
<td>20</td>
</tr>
<tr>
<td>V</td>
<td>003-212-009</td>
<td>20</td>
</tr>
<tr>
<td></td>
<td>261-191-008</td>
<td>20</td>
</tr>
</tbody>
</table>

*Source: EMC Planning Group 2015, Monterey County Assessor Office 2016, Monterey County GIS Database 2012*

Based on the most recent information available from the County, these contracts are active and notices of non-renewal have not been submitted. Consequently, development that is incompatible with the Williamson Act, including urban development, is not permitted within these areas. Government Code Section 51201(e) requires that for a use to be compatible with Williamson Act enrollment, it must not disrupt the purpose of the Williamson Act contract, which is to preserve agricultural and open space lands. According to the California Department of Conservation (DOC), a compatible use cannot displace an agricultural use or impair continuing agricultural uses subject to Williamson Act contracts. These parcels are contracted as Farmland Security Zones, with a contract period of 20 years. Incompatible urban development would not be permitted until the contracts are terminated either through non-renewal (20 years) or through the contract cancellation process.

Implementation of the following mitigation measure would reduce the conflict from proposed future urban development within Target Area B and Target Area V with existing Williamson Act contracts to less than significant.

**Mitigation Measure**

AG-2. To avoid conflicts between future urban development within Target Area B and Target Area V and the Williamson Act contracted use of land within each Target Area, one of the following mitigation options will be implemented by the City:
a. Development defined as incompatible with a Williamson Act contract pursuant to Government Code Section 51201(e) will be prohibited within the portions of Target Areas B and V that are under Williamson Act contract until the applicable Williamson Act contracts are terminated through cancellation or non-renewal; or

b. The boundaries of Target Areas B and V will be modified to exclude the acreage within a Williamson Act contract.; or

c. The portions of Target Areas B and V located on land within a Williamson Act contract will be removed from the Target Area. The equivalent acreage of land to be removed may be relocated to a different Target Area. A general plan amendment and additional CEQA compliance may be required for such a change.

Prior to approval of future individual projects within Target Areas B or V that conflict with Williamson Act contracts, one or more of the mitigation options shall be implemented through project design, conditions of approval, and/or project-specific CEQA mitigation requirements.

**IMPACT: FUTURE DEVELOPMENT WITHIN TARGET AREA B WOULD CONFLICT WITH A PERMANENT AGRICULTURAL CONSERVATION EASEMENT (LESS THAN SIGNIFICANT WITH MITIGATION)**

As illustrated in Figure 10, a portion of Target Area B is within the boundary of permanent agricultural conservation easement. Land held under this easement is to be protected in perpetuity for the purpose enumerated in the easement documentation, including in most cases, the continuation of agricultural production. This conflict is a significant impact.

Implementation of the following mitigation measure would reduce the conflict from proposed future urban development within Target Area B with the existing agricultural conservation easement to less than significant.

**Mitigation Measure**

AG-3. To avoid potential conflicts with a permanent agricultural conservation easement resulting from future development within Target Area B, one of the following mitigation options will be implemented by the City:

a. Development will be prohibited within parcels under permanent agricultural conservation easement; or

b. Coordinate with the Ag Land Trust to exchange the existing agricultural conservation easement with which development of Target Area B could be in conflict with one or more new conservation easements placed on agricultural land in an alternative location such that conflicts are eliminated.
Prior to approval of development within Target Area B which could conflict with the agricultural conservation easement, either or a combination of both of the mitigation options shall be implemented through project design, conditions of approval, and/or project-specific CEQA mitigation requirements.

**IMPACT: DEVELOPMENT OF URBAN USES WITH POTENTIAL TO FACILITATE CONVERSION OF IMPORTANT FARMLAND TO NON-AGRICULTURAL USE (LESS THAN SIGNIFICANT WITH MITIGATION)**

As discussed in the Environmental Setting section, each Target Area shares at least one boundary with land in active agricultural production on land classified as important farmland (Prime Farmland, Farmland of Statewide Importance, and/or Unique Farmland). Development of the Target Areas in locations adjacent to active agricultural operations could lead to land use conflicts between the two uses. Conflicts can include inconveniences or discomforts associated with dust, smoke, noise, and odor from agricultural operations; restrictions on agricultural operations (such as pesticide application) along interfaces with urban uses; conflicts with farm equipment and vehicles using roadways; and trespassing and vandalism on active farmlands. These conflicts could lead to constraints on the adjacent agricultural operations and, along with rising land values, could create pressure/incentives for owners of agricultural land to convert that land to non-agricultural use.

Agricultural/urban land use conflicts are generally heightened where land uses such as residential development that are sensitive to externalities created by agricultural operations are placed next to those operations. Placing agricultural operations and non-residential uses (such as retail and industrial uses proposed within the Target Areas) adjacent to each other is typically a lesser source of potential land use conflict. Non-residential uses do not typically have the same sensitivity to agricultural operation externalities. Further, non-residential uses are generally less exposed to potential externalities because the structures supporting such uses are not continuously occupied.

**EDE Policies for Limiting Agricultural Land Conversion**

Independent of externality issues discussed above, development of new urban uses adjacent to agricultural land can cause land values of the agricultural land to rise. This can occur with the expectation that the boundary of higher value urban development could expand into include such land.

The EDE contains several policies designed to limit potential for conversion of important farmland located adjacent to EOAs. Through the EDE refinement process, new urban development would be limited to the Target Areas. Hence, the EDE policies would act to avoid
conversion of important farmland located adjacent to the Target Areas. EDE Action LU-1.7.4 requires agricultural conservation easements, where feasible, to protect the most productive agricultural lands such as, but not limited to, those adjacent to Economic Opportunity Areas B, F and N. EDE Action LU-1.8.1 calls for protecting surrounding agricultural lands adjacent to Firestone Business Park (located within Target Area B). EDE Policy ED-LU-1.12 calls for protecting productive farmlands adjacent to EOA N and prohibiting additional expansion of urban uses. The City may consider incorporating such requirements into future modifications to the GSA MOU or to the future ALP update in collaboration with the County and LAFCO.

Implementation of the EDE farmland conversion avoidance policies would reduce the incentive for landowners to convert important farmland created by increased value of farmland located adjacent to urban development.

**Right-to-Farm**

To reduce potential for conflicts between agricultural uses and adjacent urban development, General Plan Implementation Program COS-11 requires the recordation of a Right-to-Farm Notice as a condition of discretionary permit approval for development within 1,000 feet of an established agricultural operation. The purpose of the Notice is to acknowledge that inconveniences and discomfort associated with the normal farming and grazing activities, such as noise and dust, could occur. The Notice must specifically state that a variety of activities may occur that may be incompatible with the proposed development and that an established agricultural operation in full compliance with applicable laws shall not be considered a nuisance due to changes in the surrounding area. The Notice must also state that a person's right to recover under a nuisance claim against these activities may be restricted. The right-to-farm program is implemented through Section 37-50.220 of the Salinas Municipal Code. The Notice would be required as a condition of approval for individual projects proposed within Target Areas as described in General Plan Implementation Program COS-11.

**Agricultural Buffers**

Use of buffers between incompatible uses is a common approach to reduce potential land use conflicts between agricultural uses and non-agricultural uses. General Plan Policy COS-3.4 calls for minimizing conflicts between agricultural and urban uses through the use of buffer zones, roads, and other physical boundaries. General Plan Implementation Program COS-1 encourages the provision and maintenance of buffers, such as roadways, topographic features, and open space, to prevent incompatibilities between agricultural and non-agricultural land uses. A number of factors are to be used to determine the appropriate buffer location and design, including the type of non-agricultural use proposed, site conditions and anticipated agricultural practices; and weather patterns, crop type, machinery and pesticide use, existence of
topographical features, trees and shrubs, and possible development of landscape berms to separate the nonagricultural use from the existing agricultural use. Buffers are typically required on the land that is being developed with non-agricultural uses. Maintaining buffers is typically the responsibility of the owner of land on which the buffer is located. Buffers between agricultural uses and non-residential uses are typically of limited size relative to those needed for more sensitive residential land uses.

Future individual development projects proposed within portions of Target Areas located adjacent to active agricultural activities will be reviewed by the City. The City would determine whether the proposed project must include agricultural buffers. If so, the City would require that projects are designed for this purpose. The requirement may be required as condition of approval or may be required as mitigation included in CEQA documentation prepared for the individual projects. The Monterey County General Plan includes specific policy for agricultural buffers that could be considered as an approach the City may choose to follow in its review of individual future development projects. Policy AG-1.2 states in general that the County will require buffers as partial mitigation for new non-agricultural development proposals that are located adjacent to agricultural land uses on farm lands designated as Prime, of Statewide Importance, Unique, or Local Importance. The policy includes general criteria to be used to establish agricultural buffers.

To ensure that the potential need for new development projects to incorporate agricultural buffers is addressed, the following mitigation measure will be implemented by the City. Implementation of the mitigation measure will, in combination with implementation of related EDE policies and the City’s Right-to-Farm condition of approval, assure that potentially significant urban development/agricultural land use conflicts are identified and mitigated to a less-than-significant level.

**Mitigation Measure**

AG-4. As part of the development review process for future individual projects proposed within Target Areas where such development is located adjacent to actively cultivated agricultural land, the City will determine whether agricultural buffers are required to reduce potential conflicts between proposed urban development and active agricultural operations. Where buffers are required, individual development projects shall be designed to incorporate buffers. Buffers shall be designed on a site-by-site basis to consider potential externalities from adjacent agricultural uses and to minimize potential health and safety effects of these externalities on users of the development proposed adjacent to the agricultural uses. Buffers shall be placed within the boundary of the urban use unless otherwise agreed to by the developer and owner of the adjacent agricultural use. Buffers may consist of open space, landscaped berms, roads, landscape features, or other features. Buffer locations shall be identified in development plans and include accompanying descriptions that
demonstrate how potential conflicts between developed uses and adjacent agricultural uses will be minimized. In cases where adjacent agricultural land is subsequently approved for urban development, buffers may be eliminated/converted to urban use once the potential for urban/agricultural land use conflicts is eliminated.

**Other Farmland Conversion Issues**

Two comments submitted in response to the NOP raised concern that conversion of agricultural land resulting from urban growth has potential to indirectly cause “replacement” conversion of habitat lands at the margins of the Salinas Valley. No specific evidence is provided that these two types of events are directly or highly correlated. The potential that the events are correlated rests on a multitude of variables. Such variables may include, but are not limited to: land ownership and location-based land costs/rents; motivations of farmers whose land is being converted to urban use to continue farming and their ability to control land at the margins of the valley; availability of land at the valley margins of sufficient quality to produce economically viable agricultural products; changes in prices for a variety of agricultural products and farmer motivations to increase their cultivation in response to positive price signals; and the location of “habitat land” and whether urban growth is directly causing conversion of such land.

CEQA Guidelines section 15145 addresses the role of speculation in the CEQA process. Lead agencies are to terminate discussion of effects it finds to be too speculative. Given the significant variables noted above, the City has determined that it would be too speculative to conclude that the proposed project would result in a significant impact from conversion of habitat land at the margins of the Salinas Valley.

### 3.3 Air Quality

This section of the EIR includes evaluation of proposed project’s impacts on air quality at a program level commensurate with the project description. The potential for air quality impacts relating to operational and construction emissions from future development within the Target Areas is analyzed. Because the proposed project is an amendment to a plan, many of the impacts are assessed in accordance with consistency with air quality planning documents.

Information is this section is derived from a variety of sources including:

- *City of Salinas General Plan Final Program EIR* (Cotton/Bridges/Associates 2002);
- *2005 Report on Attainment of the California Fine Particulate Standard in the Monterey Bay Region - Senate Bill 656 Implementation Plan.* (Monterey Bay Unified Air Pollution Control District 2005);
3.0 **Environmental Setting, Impacts and Mitigation Measures**

- *2008 Air Quality Management Plan for the Monterey Bay Region* (Monterey Bay Unified Air Pollution Control District 2008) and *Triennial Plan Revision 2009 - 2011* (Monterey Bay Unified Air Pollution Control District 2013) (together the Air Quality Plan);

- "*CEQA Air Quality Guidelines* (Air Quality Guidelines) (Monterey Bay Unified Air Pollution Control District 2008);

- California Emissions Estimator Model (CalEEMod) Version 2011.1.1 results (EMC Planning Group 2016) (included in Appendix E on the CD on the inside back cover of this EIR); and,

- *Economic Development Element Draft Transportation Impact Analysis* (Fehr & Peers 2017) (refer to Section 3.12, Transportation for more information.)

NOP responses that addressed air quality issues were received from Building Healthy Communities – East Salinas, which commented on pollutants associated with the conceptual expressways and higher vehicle miles traveled due to dispersed growth patterns, and from LandWatch Monterey County, which also commented on the increased vehicle miles traveled. The additional roadways have since been removed from the project description.

**Environmental Setting**

**Regional Climate and Topography**

Salinas is located in the North Central Coast Air Basin (hereinafter “air basin”), which lies along the central coast of California covering an area of approximately 5,159 square miles. The air basin is comprised of several interconnected valleys: a portion of the Santa Clara Valley, San Benito Valley, Salinas Valley, and Carmel Valley. A semi-permanent high-pressure cell in the eastern Pacific Ocean is the basic controlling factor in the climate of the air basin. In the summer, the high pressure cell is dominant and causes persistent west and northwest winds over the entire California coast. Air descends in the high-pressure cell forming a stable temperature inversion of hot air over a cool coastal layer of air. The onshore air currents pass over cool ocean waters to bring fog and relatively cool air into the coastal valleys. Warmer air aloft acts inhibits vertical air movement.

The generally northwest-southeast orientation of mountain ranges restricts and channels summer on-shore air currents. Surface heating in the interior portion of the Salinas and San Benito valleys creates a weak low pressure cell, which intensifies on-shore airflows during the afternoon and evening. In the fall, the surface winds become weak, and the marine layer grows shallow, dissipating altogether on some days. Airflow is occasionally reversed in a weak offshore movement, and the relatively stationary air mass is held in place by the high-pressure cell, which
allows pollutants to build up over a period of a few days. It is most often during this season that the north or east winds develop, which can transport pollutants from either the San Francisco Bay Area or the Central Valley into the air basin.

During the winter, the high-pressure cell migrates southward and has less influence on the air basin. Air frequently flows in a southeasterly direction out of the Salinas and San Benito valleys, especially during night and morning hours. Northwest winds are nevertheless still dominant in winter, but easterly flow is more frequent. The general absence of deep, persistent inversions and the occasional storm systems usually result in good air quality for the basin as a whole in winter and early spring.

**Criteria Air Pollutants and their Effects on Human Health**

The six most common and widespread air pollutants of concern, or “criteria pollutants,” are ground level ozone, nitrogen oxides, particulate matter, carbon monoxide, sulfur dioxide, and lead. In addition, volatile organic compounds are a key contributor to the criteria pollutants because they react with other substances to form ground level ozone. The primary pollutants of concern in Monterey County are ozone, and particulate matter 10 and 2.5 microns or less in size. Carbon monoxide is of secondary concern because of its role in ozone formation. The common properties, sources, and related health and environmental effects of these pollutants are summarized in Table 13, Common Air Pollutants. Air-borne lead and sulfur oxides are not significant pollutants of concern in the region (Monterey Bay Unified Air Pollution Control District 2008, 2013).

**Ozone.** Ground level ozone is produced by chemical reactions, which are triggered by sunlight, involving nitrogen oxides and volatile organic compounds. Since ozone is not directly emitted to the atmosphere, but is formed because of photochemical reactions, it is considered a secondary pollutant. Ozone is a seasonal problem, occurring roughly from April through October.

Ozone is a strong irritant that attacks the respiratory system, leading to the damage of lung tissue. Asthma, bronchitis, and other respiratory ailments, as well as cardiovascular diseases, are aggravated by exposure to ozone. A healthy person exposed to high concentrations may become nauseated or dizzy, may develop a headache or cough, or may experience a burning sensation in the chest. Research has shown that exposure to ozone damages the alveoli (the individual air sacs in the lung where the exchange of oxygen and carbon dioxide between the air and blood takes place). Research has shown that ozone also damages vegetation.

**Volatile Organic Compounds (Ozone Precursor).** Volatile organic compounds are emitted from a variety of sources, including liquid and solid fuel combustion, evaporation of organic solvents, and waste disposal.
### Table 13  Common Air Pollutants

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Properties</th>
<th>Major Sources</th>
<th>Related Health &amp; Environmental Effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ozone (O₃)</td>
<td>Created by the chemical reaction between nitrogen oxides and volatile organic compounds in the presence of heat and sunlight. Ground level ozone is the principal component of smog.</td>
<td>▪ Motor vehicle exhaust;  ▪ Industrial emissions;  ▪ Gasoline vapors;  ▪ Chemical solvents.</td>
<td>▪ Reduced lung capacity;  ▪ Irritation of lung airways and inflammation;  ▪ Aggravated asthma;  ▪ Increased susceptibility to respiratory illnesses (i.e. bronchitis).</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>Precursor of ground-level ozone.</td>
<td>▪ Petroleum transfer and storage;  ▪ Mobile sources;  ▪ Organic solvents.</td>
<td>▪ Potential carcinogen (e.g. benzene);  ▪ Toxic to plants and animals.</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOₓ)</td>
<td>Group of highly organic gases containing nitrogen in varying amounts. Many nitrogen oxides are odorless and colorless.</td>
<td>▪ Motor vehicles;  ▪ Electric utilities;  ▪ Industrial, commercial, and residential sources that burn fuel.</td>
<td>▪ Toxic to plants;  ▪ Reduced visibility;  ▪ Respiratory irritant.</td>
</tr>
<tr>
<td>Suspended and Fine Particulate Matter (PM₁₀) (PM₂.₅)</td>
<td>Describes particles in the air, including dust, soot, smoke, and liquid droplets. Others are so small that they can only be detected with an electron microscope.</td>
<td>▪ Motor vehicles;  ▪ Factories;  ▪ Construction sites;  ▪ Tilled farm fields;  ▪ Unpaved roads;  ▪ Wood burning.</td>
<td>▪ Aggravated asthma;  ▪ Increases in respiratory symptoms;  ▪ Decreased lung function;  ▪ Premature death;  ▪ Reduced visibility.</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>Colorless, odorless gas that is formed when carbon in fuel is not burned completely. Secondary ground-level ozone precursor.</td>
<td>▪ Fuel combustion;  ▪ Industrial processes;  ▪ Highly congested traffic.</td>
<td>▪ Chest pain for those with heart disease;  ▪ Vision problems;  ▪ Reduced mental alertness;  ▪ Death (at high levels)</td>
</tr>
</tbody>
</table>

*Source:* Monterey Bay Unified Air Pollution Control District 2008, 2013; U.S. Environmental Protection Agency 2016
Nitrogen Oxides (Ozone Precursor). Most nitrogen oxides are created during combustion of fuels. Nitrogen oxides are a major contributor to ozone formation. Nitrogen dioxide is a reddish-brown gas that can irritate the lungs and can cause breathing difficulties at high concentrations. Like ozone, nitrogen dioxide is not directly emitted, but is formed through a reaction between nitric oxides and atmospheric oxygen. Nitrogen dioxide also contributes to the formation of particulate matter (see discussion below). Nitrogen dioxide concentrations in the air basin have been well below ambient air quality standards; therefore, nitrogen dioxide concentrations from land use projects are not a concern.

Particulate Matter. Particulate matter is comprised of small, suspended particles, primarily composed of dust particles, nitrates, and sulfates. Particulate matter is classified as under 10 microns (suspended particulate matter or PM$_{10}$) and under 2.5 microns (fine particulate matter or PM$_{2.5}$). Suspended particulate matter is directly emitted to the atmosphere as a byproduct of fuel combustion, wind erosion of soil and unpaved roads, and from construction or agricultural operations. Small particles are also created in the atmosphere through chemical reactions. Approximately 64 percent of fugitive dust is suspended particulate matter. Minimal grading typically generates about 10 pounds per day per acre on average while excavation and earthmoving activities typically generate about 38 pounds per day per acre.

Although particles greater than 10 microns in diameter can cause irritation in the nose, throat, and bronchial tubes, natural mechanisms remove much of these particles. Particles less than 10 microns in diameter are able to pass through the body’s natural defenses and the mucous membranes of the upper respiratory tract and enter into the lungs. The particles can damage the alveoli. The particles may also carry carcinogens and other toxic compounds, which can adhere to the particle surfaces and enter the lungs.

Carbon Monoxide. Carbon monoxide is a component of motor vehicle exhaust, which contributes about 56 percent of all carbon monoxide emissions nationwide. Other non-road engines and vehicles (such as construction equipment and boats) contribute about 22 percent of all carbon monoxide emissions nationwide. Carbon monoxide can cause harmful acute health effects by reducing oxygen delivery to the body’s organs (like the heart and brain) and tissues. Photochemical oxidation of carbon monoxide in the presence of nitrogen oxides and water vapor contributes to the formation of ground-level ozone. California Air Resources Board data show a steady decrease in CO emissions levels from 2000 through 2015:

- 2000: 349.7 tons per day;
- 2005: 244.9 tons per day;
- 2010: 179.9 tons per day; and
- 2015: 149.3 tons per day.
The California Air Resources Board’s emissions projection for 2025 is 118.0 tons per day.

Higher levels of carbon monoxide generally occur in areas with heavy traffic congestion. In cities, 85 to 95 percent of all carbon monoxide emissions may come from motor vehicle exhaust. Concentration of carbon monoxide is a direct function of vehicle idling time and, thus, traffic flow conditions. Transport of carbon monoxide is extremely limited; it disperses rapidly from the source under normal meteorological conditions. Under certain meteorological conditions, however, carbon monoxide concentrations close to a congested roadway or intersection may reach unhealthy levels, affecting local sensitive receptors (residents, school children, hospital patients, the elderly, etc.). Emissions thresholds established for carbon monoxide apply to direct or stationary sources. Typically, high carbon monoxide concentrations are associated with roadways or intersections operating at unacceptable levels of service. Congested intersections with high volumes of traffic could cause carbon monoxide “hot spots,” where localized high concentrations of carbon monoxide occur. Carbon monoxide also contributes to ozone formation.

**Toxic Air Contaminants and their Effects on Human Health**

Toxic air contaminants are pollutants that may be expected to result in an increase in mortality or serious illness or may pose a present or potential health hazard. Health effects include cancer, birth defects, neurological damage, damage to the body's natural defense system, and diseases that lead to death. Toxic air contaminants can be classified as either carcinogens or non-carcinogens. The Monterey Air Resources District (formerly the Monterey Bay Unified Air Pollution Control District) considers an incremental risk of greater than 10 cases per million to be a significant impact. The 10 excess cases per million equates to the possibility of causing 10 additional cancer cases in a population of one million. This risk level also is used by the Air Toxics “Hot Spots” (AB 2588) program and Proposition 65 as the public notification level for air toxic emissions from existing sources. The EPA has established National Emission Standards for Hazardous Air Pollutants, which are applicable to asbestos, beryllium, mercury, vinyl chloride, benzene, arsenic, and radon/radionuclides.

**Diesel Emissions.** Diesel exhaust is the predominant toxic air contaminant in urban air and is estimated to represent about two-thirds of the cancer risk from toxic air contaminants. Diesel engines emit a complex mix of pollutants, including nitrogen oxides, particulate matter, and toxic air contaminants. The most visible constituents of diesel exhaust are very small carbon particles or soot, known as diesel particulate matter. Diesel exhaust also contains over 40 cancer-causing substances, most of which are readily adsorbed on the soot particles. Among the toxic air contaminants contained in diesel exhaust are dioxin, lead, polycyclic organic matter, and acrolein. Short-term exposure to diesel particulate matter is associated with variable irritation and inflammatory symptoms. Diesel engine emissions are responsible for a majority of
California's estimated cancer risk attributable to air pollution. Diesel particulate matter is a significant fraction of California’s particulate pollution (California Air Resources Board 2005, California Office of Environmental Health Hazard Assessment 2001).

Diesel exhaust is especially common during the grading stage of construction (when most of the heavy equipment is used), and adjacent to heavily trafficked roadways where diesel trucks are common. The United States Environmental Protection Agency (EPA) regulates diesel engine design and fuel composition at the federal level, and has implemented a series of measures since 1994 to reduce nitrogen oxides and particulate emissions from off-road and highway diesel equipment. Ultralow sulfur off-road and highway diesel fuels, 15 parts sulfur per million (ppm) became the standard in California by 2007, replacing the previous 500 ppm fuel (Clean Diesel Fuel Alliance 2016).

EPA Tier 1 non-road diesel engine standards were introduced in 1996, Tier 2 in 2001, Tier 3 in 2006, and Tier 4 in 2011, with final Tier 4 in 2014 (DieselNet 2016). Table 14, Typical Non-road Engine Emissions Standards, compares emissions standards for NOX and particulate matter from non-road engine Tier 1 through Tier 4 for typical engine sizes. As illustrated in the table, emissions for these pollutants have decreased significantly for construction equipment manufactured over the past 20 years, and especially for construction equipment manufactured since 2014.

**Table 14**  Typical Non-road Engine Emissions Standards (g/bhp-hr)

<table>
<thead>
<tr>
<th>Engine Tier</th>
<th>NOX Emissions</th>
<th>Particulate Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>100-175 HP</td>
<td>175-300 HP</td>
</tr>
<tr>
<td>Tier 1</td>
<td>6.90</td>
<td>6.90</td>
</tr>
<tr>
<td>Tier 2</td>
<td>6.90 †</td>
<td>6.90 †</td>
</tr>
<tr>
<td>Tier 3</td>
<td>6.90 †</td>
<td>6.90 †</td>
</tr>
<tr>
<td>Tier 4</td>
<td>0.30</td>
<td>0.30</td>
</tr>
</tbody>
</table>


† - standard not adopted; standard shown is for prior tier

In California, non-road equipment fleets can retain older equipment, but fleets must meet averaged emissions limits; new equipment must be Tier 3 or better after January 2018 (for large and medium fleets) or January 2023 (for small fleets); and over time the older equipment must be fitted with particulate filters. Large and medium fleets have increasingly strict fleet compliance targets through 2023 and small fleets through 2029. A small fleet has total horse power of 2,500 or less, and a medium fleet has total horsepower of between 2,500 and 5,000. All
non-road equipment operating in California is registered with the California Air Resources Board, which issues an equipment identification number (California Air Resources Board 2016).

**Asbestos.** Asbestos is found in several kinds of building materials and also occurs naturally in serpentine rocks and soils formed from those rocks (California Department of Conservation, Division of Mines and Geology 2000). Asbestos was mined in southern Monterey County in the past. One of the largest asbestos mines in California was located near the San Benito County/Fresno County line, and closed in 2002 (United States Geological Survey and California Geological Survey 2011). Asbestos is generally not harmful when asbestos-containing materials are left undisturbed, but when soils or materials containing asbestos are disturbed, microscopic fibers can be dislodged and remain in the air for long periods. If asbestos fibers are inhaled, they can become lodged in body tissues and pose a serious health threat, especially for lung disease. Handling and disposal of asbestos containing materials is regulated by federal and state law. The project site does not contain buildings that would have asbestos containing materials. Soils are composed of deep alluvial soils and the sites do not contain serpentine rocks, although naturally occurring asbestos has been discovered in some Salinas Valley soils (United States Geological Survey and California Geological Survey 2011).

**Construction Emissions**

Emissions generated during construction are “short-term” in the sense that they would be limited to the actual periods of site development and construction. Short-term construction emissions are typically generated by the use of heavy equipment, the transport of materials, and construction employee commute trips. Construction-related emissions consist primarily of reactive organic gasses, nitrogen oxides, suspended particulate matter, and carbon monoxide. Emissions of reactive organic gasses, nitrogen oxides, and carbon monoxide are generated primarily by the operation of gas and diesel-powered motor vehicles, asphalt paving activities, and the application of architectural coatings. Suspended particulate matter emissions are generated by wind erosion of exposed graded surfaces and diesel engines.

**Stationary Source Emissions**

Stationary sources include factories, boilers, generators, and gasoline dispensing stations, all of which require an operating permit from the air district.

**Sensitive Receptors**

Although air pollution can affect all segments of the population, certain groups are more susceptible to its adverse effects than others. Children, the elderly, and the chronically or acutely ill are the most sensitive population groups. These sensitive receptors are commonly associated
with specific land uses, such as residential areas, schools, parks, retirement homes, and hospitals. In addition, certain air pollutants, such as carbon monoxide, only have significant effects if they directly affect a sensitive population. Sensitive receptors near the proposed Target Areas include residences and schools.

**Regulatory Setting**

**Federal/State**

**Federal Clean Air Act.** Air quality is regulated on the federal level. The Clean Air Act, adopted in 1970 and amended in 1990, set federal standards for air quality. The California Clean Air Act was adopted by the state legislature in 1988.

The federal Clean Air Act required the EPA to set National Ambient Air Quality Standards for several air pollutants on the basis of human health and welfare criteria. The Clean Air Act also set deadlines for the attainment of these standards. The Clean Air Act established two types of national air standards: primary and secondary standards. Primary standards set limits to protect public health, including the health of sensitive persons such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings. Historically, air quality laws and regulations have divided air pollutants into two broad categories of airborne pollutants: “criteria pollutants” and “toxic air contaminants.”

In general, the Clean Air Act creates a partnership between state and federal governments for implementation of the Clean Air Act provisions. The federal Clean Air Act requires states to prepare an air quality control plan known as a State Implementation Plan. California’s State Implementation Plan contains the strategies and control measures that California will use to attain the National Ambient Air Quality Standards. If, when reviewing the State Implementation Plan for conformity with Clean Air Act Amendments mandates, the EPA determines a State Implementation Plan to be inadequate, EPA may prepare a Federal Implementation Plan for the non-attainment area and may impose additional control measures.

The Lewis-Presley Air Quality Management Act, adopted in 1976 and amended in 1987, and the California Clean Air Act, adopted in 1988 and amended in 1992, provide the basis for air quality regulation by the state. The California Clean Air Act requires that all air districts in the state endeavor to achieve and maintain California Ambient Air Quality Standards for ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, and particulate matter. The California Clean Air Act specifies that air districts focus particular attention on reducing the emissions from transportation and area-wide emission sources, and the California Clean Air Act provides districts with authority to regulate indirect sources.
United States Environmental Protection Agency. The EPA was established in 1970, the same year the federal Clean Air Act was passed, and has primary responsibility for establishing the standards the states must enforce, for conducting research, and for providing financial and technical assistance to the states. When necessary, the EPA steps in to aid the states in implementation and enforcement of clean air regulations.

Federal and State Standards for Air Pollutants. Ambient air quality is described in terms of compliance with the state and national standards. In general, criteria pollutants are pervasive constituents, such as those emitted in vast quantities by the combustion of fossil fuels. Both the state and federal governments have developed ambient air quality standards for the most prevalent pollutants, which include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, suspended particulate matter, and fine particulate matter. Table 15, Federal and State Ambient Air Quality Standards, lists state and federal ambient air quality standards for common air pollutants. The state standards generally have lower thresholds than the federal standards, yet both are applicable to the proposed project. When state thresholds are exceeded at regional monitoring stations, an “attainment plan” must be prepared that outlines how an air quality district will achieve compliance with the state standards. Generally, these plans must provide for district-wide emission reductions of five percent per year averaged over consecutive three-year periods.

National Emissions Standards for Hazardous Air Pollutants are emissions standards set by the EPA for an air pollutant not covered by National Ambient Air Quality Standards that may cause an increase in fatalities or in serious, irreversible, or incapacitating illness. The standards for a particular source category require the maximum degree of emission reduction that the EPA determines to be achievable, which is known as the Maximum Achievable Control Technology.

Air Quality Management Plans. The federal Clean Air Act requires areas with unhealthful levels of ozone, inhalable particulate matter, carbon monoxide, nitrogen dioxide, and sulfur dioxide to develop plans, known as State Implementation Plans. State Implementation Plans are comprehensive plans that describe how an area will attain national ambient air quality standards. State Implementation Plans are a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. California grants air districts explicit statutory authority to adopt indirect source regulations and transportation control measures, including measures to encourage the use of ridesharing, flexible work hours, or other measures that reduce the number or length of vehicle trips. Local air districts and other agencies, such as the Bureau of Automotive Repair and the Department of Pesticide Regulation, prepare State Implementation Plan elements and submit them to the California Air Resources Board for review and approval. The California Air Resources Board forwards State Implementation Plan revisions to the EPA for approval and publication in the Federal Register. The 1990 amendments to the federal Clean Air Act set deadlines for attainment based on the severity of an area’s air pollution problem.
## Table 15  Federal and State Ambient Air Quality Standards

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Averaging Time</th>
<th>California Standards</th>
<th>Federal Standards</th>
<th>Federal Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Concentration 3</td>
<td>Primary 3,4</td>
<td>Secondary 3,5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ppm</td>
<td>µg/m³</td>
<td>ppm</td>
</tr>
<tr>
<td>Ozone</td>
<td>1 Hour</td>
<td>0.09</td>
<td>180</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>8 Hour</td>
<td>0.07</td>
<td>137</td>
<td>0.07</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>24 Hour</td>
<td>-</td>
<td>50</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>-</td>
<td>20</td>
<td>-</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>24 Hour</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Annual</td>
<td>-</td>
<td>12</td>
<td>-</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>1 Hour</td>
<td>20</td>
<td>23,000</td>
<td>35</td>
</tr>
<tr>
<td></td>
<td>8 Hour</td>
<td>9</td>
<td>10,000</td>
<td>9</td>
</tr>
<tr>
<td>Nitrogen Dioxide (NO(_{2}))</td>
<td>1 Hour</td>
<td>0.18</td>
<td>339</td>
<td>0.100</td>
</tr>
<tr>
<td></td>
<td>Annual Mean</td>
<td>0.03</td>
<td>57</td>
<td>0.053</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO(_{2}))</td>
<td>1 Hour</td>
<td>0.25</td>
<td>655</td>
<td>0.075</td>
</tr>
<tr>
<td></td>
<td>3 Hour</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Lead(^7)</td>
<td>30 Day Average</td>
<td>-</td>
<td>1.5</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Rolling 3 Month</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Visibility Reducing Particles</td>
<td>8 Hour</td>
<td>Extinction coefficient of 0.23 per kilometer - visibility of ten miles or more due to particles when relative humidity is less than 70 percent. Method: Beta attenuation and transmittance through filter tape.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sulfates</td>
<td>24 Hour</td>
<td>-</td>
<td>25</td>
<td>-</td>
</tr>
<tr>
<td>Pollutant</td>
<td>Averaging Time</td>
<td>California Standards ¹</td>
<td>Federal Standards ²</td>
<td></td>
</tr>
<tr>
<td>-------------------</td>
<td>----------------</td>
<td>------------------------</td>
<td>---------------------</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Concentration</td>
<td>Primary ³,⁴</td>
<td>Secondary ³,⁵</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ppm</td>
<td>µg/ m³</td>
<td>ppm</td>
</tr>
<tr>
<td>Hydrogen Sulfide</td>
<td>1 Hour</td>
<td>0.03</td>
<td>42</td>
<td></td>
</tr>
<tr>
<td>Vinyl Chloride</td>
<td>24 Hour</td>
<td>0.01</td>
<td>26</td>
<td></td>
</tr>
</tbody>
</table>

Source: California Air Resources Board 2015.

Notes:

¹California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM₁₀, PM₂.₅, and visibility reducing particles—are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

²National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM₂.₅, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.

³Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

⁴National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

⁵National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

⁶To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 0.100 ppm.

⁷The California Air Resources Board has identified lead and vinyl chloride as ‘toxic air contaminants’ with no threshold levels of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

**State Toxic Air Contaminants Regulation.** Enacted in 1983, the Toxic Air Contaminant Identification and Control Act created California’s program to reduce exposure to air toxics. The Air Toxics "Hot Spots" Information and Assessment Act of 1987 requires a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

The California Air Resources Board is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, the California Air Resources Board must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California,"
persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code section 39666(f)]. The California Air Resources Board uses available information to prioritize compounds. California Air Resources Board regulations restrict to 0.25 percent the asbestos content of material used in surfacing applications such as unpaved roads, parking lots, driveways, and walkways.

The Office of Environmental Health Hazard Assessment assists the California Air Resources Board by developing the health assessment portion of the TAC identification documents; reviews facility risk assessments for the "Hot Spots" Program; is developing new risk assessment guidelines for the "Hot Spots" Program; and is the lead agency for Proposition 65. The Department of Pesticide Regulation regulates toxic air contaminants that are also pesticides.

**California Air Resources Board.** The federal Clean Air Act give states primary responsibility for directly monitoring, controlling, and preventing air pollution. The California Air Resources Board is responsible for coordination and oversight of federal, state, and local air pollution control programs in California and for implementing the requirements of the federal Clean Air Act and California Clean Air Act. The duties of California Air Resources Board include coordinating air quality attainment efforts, setting standards, conducting research, and creating solutions to air pollution. The California Air Resources Board, which is a state agency located within the California Environmental Protection Agency, oversees regional or local air quality management or air pollution control districts that are charged with developing attainment plans for the areas over which they have jurisdiction. The California Air Resources Board grants these regional or local air districts explicit statutory authority to adopt indirect source regulations and transportation control measures, including measures to encourage the use of ridesharing, flexible work hours, or other measures that reduce the number or length of vehicle trips.

**Local Plans and Regulations**

**Monterey Bay Air Resources District.** The Monterey Bay Air Resources District (until recently known as the Monterey Bay Unified Air Pollution Control District) is the agency with primary responsibility for assuring that federal and state ambient air quality standards are attained and maintained in the air basin. The air basin encompasses three counties: Monterey, San Benito, and Santa Cruz. The air district is charged with regulatory authority over stationary sources of air emissions, monitoring air quality within the air basin, providing guidelines for analysis of air quality impacts pursuant to CEQA, and preparing an air quality management plan to maintain or improve air quality in the air basin.

**Air Basin Attainment Status.** In accordance with the Clean Air Act, the California Air Resources Board is required to designate areas of the state as attainment, non-attainment, or unclassified with regard to its compliance with state standards for criteria air pollutants. An "attainment" designation for an area signifies that pollutant concentrations do not violate the
standard for that pollutant in that area. A “non-attainment” designation indicates that a pollutant concentration violated the standard at least once, excluding an “unclassified” designation signifies that available data does not support either an attainment or non-attainment status. A “non-attainment transitional” status infers that the air basin has had fewer than three exceedances at any one monitoring station. The California Clean Air Act divides districts into moderate, serious, and severe air pollution non-attainment categories, with increasingly stringent control requirements mandated for each category.

The air basin is in non-attainment with state mandated thresholds for ozone and suspended particulate matter. With respect to federal standards, the air basin has either achieved attainment or is unclassified. Table 16, Ambient Air Quality Attainment Status, identifies the current status within the air basin for each criteria pollutant.

### Table 16 North Central Coast Air Basin Attainment Status Designations

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>State</th>
<th>Federal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ozone (O₃)</td>
<td>Non-attainment</td>
<td>Attainment/Unclassified</td>
</tr>
<tr>
<td>Suspended Particulates (PM₁₀)</td>
<td>Non-attainment</td>
<td>Attainment</td>
</tr>
<tr>
<td>Fine Particulates (PM₂.₅)</td>
<td>Attainment</td>
<td>Attainment/Unclassified</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>Attainment (Monterey Co)</td>
<td>Attainment/Unclassified</td>
</tr>
<tr>
<td>Nitrogen Dioxide (NO₂)</td>
<td>Attainment</td>
<td>Attainment/Unclassified</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>Attainment</td>
<td></td>
</tr>
<tr>
<td>Lead</td>
<td>Attainment</td>
<td>Attainment/Unclassified</td>
</tr>
</tbody>
</table>

Source: Monterey Bay Air Resources District 2015.

The air district is delegated with the responsibility at the local level to implement both federal and state mandates for improving air quality in the air basin through an air quality plan. When thresholds are exceeded at regional monitoring stations on consecutive accounts, an attainment plan must be prepared that outlines how an air quality district will achieve compliance. Generally, these plans must provide for district-wide emission reductions of five percent per year averaged over consecutive three-year periods. The air district periodically prepares and updates plans in order to attain State and national air quality standards, to comply with quality planning requirements, and to achieve the goal of clean and healthful air. These plans also report on progress in improving air quality and provide a road map to guide the air district’s future activities.

The air district adopted the Air Quality Management Plan for the Monterey Bay Region (“Air Quality Plan”) in 1991 and completed several updates in subsequent years, most recently the Triennial...
Plan Revision 2009 – 2011, adopted in 2013, which is an update to and incorporates the by reference the 2008 Air Quality Management Plan for the Monterey Bay Region. The Air Quality Plan presents measures to control emissions of volatile organic compounds from stationary and mobile sources in order to meet the ozone standard mandated by the California Clean Air Act. In 2006 the California Air Resources Board made the ambient air quality standards more stringent by adding an 8-hour ozone average to the standard.

The Air Quality Plan addresses only attainment of the State ozone standard. Attainment of the State PM$_{10}$ standard is addressed in the air district’s 2005 Report on Attainment of the California Fine Particulate Standard in the Monterey Bay Region - Senate Bill 656 Implementation Plan, which was adopted in December 2005. The plan focuses on reduction of fugitive dust and diesel particulate matter emissions.

City of Salinas General Plan. The General Plan includes a number of policies that directly or indirectly relate to air quality. For example, policies relating to compact growth have the effect of reducing vehicle miles traveled, and therefore reducing mobile source air emissions. The following are the most pertinent General Plan policies relating directly or indirectly to air quality.

**Policy LU-1.1:** Achieve a balance of land uses to provide for a range of housing, jobs, libraries, and educational and recreational facilities that allow residents to live, work, shop, learn, and play in the community.

**Policy LU-2.4:** Utilize well-designed in-fill development, and selectively increase density within Focused Growth Areas to maintain compact city form.

**Goal COS-6:** Improve air quality through proper planning for land use, transportation and energy use.

**Policy COS-6.1:** Cooperate with the Monterey Bay Unified Air Pollution Control District to implement the Air Quality Plan.

**Policy COS-6.2:** Implement measures to protect air quality that may be required to mitigate the effects of population growth.

**Policy COS-6.3:** Encourage development design that maintains air quality and reduces direct and indirect emissions of air contaminants.

**Policy COS-6.4:** Support alternative modes of transportation, such as walking, biking and public transit, and develop bike- and pedestrian-friendly neighborhoods to reduce emissions associated with automobile use.
Policy C-1.1: Create and preserve distinct, identifiable neighborhoods that have traditional neighborhood development (TND) characteristics and corresponding circulation systems. Specifically, the street network should have the following characteristics:

- Individual blocks should average less than 600 feet in length and less the 1,800 feet in perimeter;

- Streets should be organized in a comprehensive hierarchical network that manifests the structure of the neighborhood;

- Cul-de-sacs should be avoided unless natural conditions demand them;

- The street network should be interconnected; and

- Transit access, passenger safety, and transit facilities should be included in the street network design.

Policy C-1.9: Use traffic calming methods within residential areas where necessary to create a pedestrian-friendly circulation system.

Policy C-1.10: Encourage car-pooling, at government offices, business, schools, and other facilities, to reduce the number of vehicles using the roadway system.

Policy C-2.5: Work with Caltrain and Amtrak to provide commuter rail service to the Silicon Valley and other major destinations to provide alternatives to automobile use.

Policy C-2.6: Promote a regional jobs-housing balance to reduce vehicle miles traveled and congestion on the regional circulation system.

Policy C-2.7: Support continued maintenance and expanded use of the City's Intermodal Transportation Center.

Policy C-3.2: Design development and reuse/revitalization projects to be transit-oriented to promote the use of alternative modes of transit and support higher levels of transit service.

Policy C-4.1: Continue to develop a network of on- and off-street bicycle routes to encourage and facilitate the use of bicycles for commute, recreational, and other trips. Eliminate gaps and provide connections between existing bicycle routes.
Policy C-4.4: Improve the biking environment by providing safe and attractive cut-throughs, bike lanes, and bike paths for both recreational and commuting purposes.

Policy C-5.1: Increase availability of safe and well-maintained sidewalks in all areas of the City.

Policy C-5.5: Improve the walking environment by providing safe and attractive sidewalks, cut-throughs, and walkways, for both recreational and commuting purposes.

Impacts related to potential conflicts of the proposed project with plans and programs to promote alternative transportation are discussed in Section 3.12, Transportation.

Proposed EDE Policies

The EDE contains policies and implementation actions relative to alternative modes of transportation that directly or indirectly address air quality, and implementation of which may serve as mitigation for significant impacts. Note that some of these apply to EOAs that do not include proposed Target Areas, but the policies may nonetheless reduce impacts. Impacts related to potential conflicts of the proposed project with plans and programs to promote alternative transportation are discussed in Section 3.12, Transportation. The applicable policies are:

Policy ED-C-2.1: Partner with TAMC, Caltrans and other agencies to realize commuter rail service to Salinas from the San Francisco Bay Area, to focus City actions and investment to implement the Salinas Intermodal Transportation Center Master Plan, including land acquisition and extension of Lincoln Avenue, and to promote transit-oriented, high density residential, commercial, and office infill within the master plan area.

Action C-2.1.1: Create incentives for large employers and employment centers to locate in areas conducive to transit use and other alternative modes, particularly along existing or planned transit routes, the future Intermodal Transportation Center, and regional bicycle corridors.

Action C-2.1.3: Require large employers who locate near the new Salinas Intermodal Transportation Center to implement transportation demand management programs that promote carpooling, vanpooling, and transit use as required by the City’s Trip Reduction Plan ordinance. Large employers within a few miles of the new Center should be encouraged to create or contribute to an employee shuttle system.
Policy ED-C-2.3: Connect the City’s downtown with the rail station, Chinatown, Alisal Market Place, and Carr Lake.

Policy ED-C-2.8: Partner with TAMC and MST to support a future connection between the Salinas Transit Center and the planned Monterey Peninsula light rail transit service, including a direct bus route.

Policy ED-C-2.13: Prioritize the creation and enhancement of transit, bicycle, and pedestrian facilities in areas that will attract users. Such areas should include neighborhoods or corridors with high proportions of one- and zero-vehicle households, areas with high residential and/or employment density, concentrations of retail, cultural, and civic destinations and/or areas with reduced parking requirements.

Action QL-4.1.6: Provide well-designed accessible sidewalks that encourage safe pedestrian uses.

Standards of Significance

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of air quality, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on the subject of air quality impacts, or indeed on any subject addressed in the checklist. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- Cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Conflict with or obstruct implementation of the applicable air quality plan;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Create objectionable odors affecting a substantial number of people.
Analysis, Impacts, and Mitigation

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

It should be noted that the modeling and analysis presented herein assumes that conceptual expressways proposed in the EDE are constructed. These have since been removed from the project description. Additional technical review was performed by a third party technical expert to determine whether or not the identified levels of significance would change as result of the expressway removal. In terms of air emissions, removal of the expressways would not be expected to result in changes to the impacts resulting from population generation, including conflicts with an air quality plan or violation of criteria air pollutant standards or contribution to a non-attainment status for ozone and ozone precursors. Further, impacts related to point source emissions, exposure to toxic air contaminants, carbon monoxide, and odors would not change substantively from what is presented below. The analyses provided below for violation of criteria pollutant standards and contribution to non-attainment status for particulate matter are considered conservative, since removing the expressways would eliminate construction-related emissions associated with the expressways. Refer to Appendix E for a complete summary of the changes to the analysis as a result of expressway removal.

Impact: Development Resulting in Conflict with the Air Quality Plan for Ozone (No Impact)

The Air Quality Plan focuses on reduction of ozone levels within the air basin. As identified by the air district, emissions of ozone precursors (i.e., NOX) that are not consistent with the population projections on which the Air Quality Plan is based, are not accommodated in the Air Quality Plan for ozone and will have a significant cumulative impact unless offset. The air district was contacted regarding preparation of a consistency determination. The air district reviewed the project description and concluded that a consistency determination was not necessary because the proposed project would not have any residential uses (i.e., it would not increase population beyond that anticipated and accounted for in the Air Quality Plan for ozone). Therefore, the proposed project does not conflict with the Air Quality Plan for ozone. An email from the air district confirming the project description and providing the consistency determination is included in Appendix F (included on the CD on the inside back cover of this EIR).
IMPACT: DEVELOPMENT RESULTING IN VIOLATION OF CRITERIA AIR POLLUTANT STANDARDS – OZONE AND PRECURSORS (NO IMPACT)

The air district is in non-attainment for ozone. Air district guidance for analysis of air quality impacts of planning documents consists of assessing consistency with the Air Quality Plan. This analysis is presented above and indicates no impact for ozone and ozone precursors, such as NOX.

IMPACT: DEVELOPMENT RESULTING IN SUBSTANTIAL CUMULATIVE CONTRIBUTION TO THE EXISTING NON-ATTAINMENT STATUS FOR OZONE (NO IMPACT)

The air district is in non-attainment for ozone. Air district guidance for analysis of cumulative air quality impacts consists of assessing consistency with the Air Quality Plan. This analysis is presented above and indicates no impact for ozone and ozone precursors, such as NOX.

IMPACT: VIOLATION OF CRITERIA AIR POLLUTANT STANDARDS – CONSTRUCTION PHASE PARTICULATE MATTER (LESS THAN SIGNIFICANT IMPACT WITH MITIGATION)

The air basin is in non-attainment for the state ambient air quality standard for suspended particulate matter (PM$_{10}$). Based on analysis conducted by the air district, projects that include earthmoving activities on over 2.2 acres per day or general construction activities on over 8.1 acres per day are correlated with the emission of greater than the air district’s threshold of 82 pounds of particulate matter per day. It is possible that future individual projects proposed within the Target Areas could involve grading that exceeds 2.2 acres per day. Therefore, fugitive dust from construction could exceed particulate matter emissions standards, and result in a significant impact. Based on direction provided by the air district, implementation of mitigation measure AQ-1 presented below would reduce this impact to a less-than-significant level.

Mitigation Measures

AQ-1. Prior to issuance of grading permits, project proponents shall prepare a grading plan subject to review and approval by the City. In the event ground disturbance exceeds 2.2 acres per day for initial site preparation activities that involve extensive earth moving activities (grubbing, excavation, rough grading), and 8.1 acres per day for activities that involve minimal earth moving (e.g. finish grading), the required grading plans shall include the following measures to be implemented as needed to prevent visible dust emissions:

a. Water all active construction sites to prevent visible dust emissions. Frequency should be based on the type of operation, soil, and wind exposure;

b. Prohibit all grading activities during periods of high wind (over 15 mph);
c. Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days);

d. Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed area;

e. Maintain at least 1'-0" of freeboard in haul trucks;

f. Plant tree windbreaks or construct windbreaks on the windward perimeter of construction projects adjacent to open land;

g. Cover inactive storage piles;

h. Sweep streets if visible soil material is carried out from the construction site; and/or

i. Post a publicly-visible sign written in English and Spanish with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The phone number of the air district shall also be visible to ensure compliance with rule 402 (nuisance).

**IMPACT: SUBSTANTIAL CUMULATIVE CONTRIBUTION TO THE EXISTING NON-ATTAINMENT STATUS FOR PARTICULATE MATTER (LESS THAN SIGNIFICANT WITH MITIGATION)**

In accordance with the air district’s Air Quality Guidelines section 5.4, a project that would result in particulate matter emissions in excess of the project level standard discussed above would also result in a cumulative contribution to the existing non-attainment status for particulate matter. Mitigation measure AQ-1 above requires fugitive dust emissions measures that would reduce particulate matter emissions to a less-than-significant level (below the project level standard) as identified by the air district. Therefore, as mitigated, cumulative emissions impacts for particulate matter would be less than considerable.

**IMPACT: EXPOSURE OF SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS FROM FUTURE POINT SOURCES OF EMISSIONS WITHIN TARGET AREAS (LESS THAN SIGNIFICANT)**

Several of the Target Areas are adjacent to residential areas and schools. Table 17, Risk Areas for Point Source Pollutant Concentrations, summarizes the sensitive receptors located near each of the Target Areas.
### Table 17  Risk Areas for Point Source Pollutant Concentrations

<table>
<thead>
<tr>
<th>Location</th>
<th>Sensitive Receptors within 1,000 Feet</th>
<th>Proposed Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area B</td>
<td>None</td>
<td>Industrial</td>
</tr>
<tr>
<td>Target Area F</td>
<td>None</td>
<td>Retail</td>
</tr>
</tbody>
</table>
| Target Area K | Mobile home park on Russell Road  
                  Mobile home park on Russ Christensen Road  
                  Apartments on Russell Road  
                  Gavilan View Middle School | Business Park |
| Target Area L2 | None                                                                 | Retail         |
| Target Area N | Pajaro Street and Blanco Road residential neighborhoods  
                  Padre Road Senior Housing | Retail         |
| Target Area V | East Bernal Road/Natividad Road residential neighborhoods  
                  Salinas Adult School/Mt. Toro High School  
                  Mobile home parks on Kern Street and Sherwood Drive  
                  Apartments on Casentini Street | Retail         |

*Source: Google Maps 2016.*

Industrial uses are most likely to result in substantial pollutant concentrations. However, Target Area B, which is the only Target Area designated Industrial, is not located near sensitive receptors. Future development within Target Areas designated Retail and Business Park could also potentially result in substantial point source pollutant concentrations, for example, from gasoline dispensing stations, generators, or other equipment.

As described in the Regulatory Setting section above, the air district issues permits for stationary emissions sources consistent with the air district’s rules and regulations. Required conformance with air district rules and regulations will reduce potential impacts. No mitigation is required.

**IMPACT: EXPOSURE OF SENSITIVE RECEPTORS TO TOXIC AIR CONTAMINANTS RESULTING FROM INCREASED TRAFFIC GENERATED BY THE PROPOSED PROJECT (LESS THAN SIGNIFICANT)**

Among the pollutants emitted from operation of motorized vehicles are toxic air contaminants, including diesel particulate matter from diesel engines. The severity of impacts from toxic air emissions is related to the volume of traffic and distance of sensitive receptors from the roadway. Guidance issued by the state indicates that a distance of about 500 feet is considered adequate to...
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protect against exposure of sensitive receptors to adverse health effects. In general, urban area roadways with traffic volumes under 100,000 daily trips are considered to have less than significant adverse health effects (California Air Resources Board 2005).

**IMPACT: EXPOSURE OF SENSITIVE RECEPTORS TO CARBON MONOXIDE CONCENTRATIONS RESULTING FROM INCREASED TRAFFIC AND TRAFFIC CONGESTION GENERATED BY THE PROPOSED PROJECT (LESS THAN SIGNIFICANT)**

Carbon monoxide emissions from mobile sources (vehicles) has potential to concentrate at substantial levels at heavily congested locations (intersections and along road segments) within a road network. Heavily congested areas are those where traffic conditions are characterized as LOS E or LOS F. In these circumstances, carbon monoxide emissions can accumulate. If sensitive receptors such as residential areas or schools are located immediately adjacent these locations, carbon monoxide exposure can be of concern. However as noted in the Regulatory Setting above, CO emissions have been declining in the state of California due to reductions in pollution from tailpipes.

Under Target Area buildout conditions, the TIA indicates that several roadway segments in or near the City would operate at LOS E or LOS F as a result of the proposed project. Section 3.12, Transportation, identifies these as significant transportation impacts and provides mitigation measures to reduce the impacts to a less-than-significant level at all but two of the road segments.

**Table 18, Risk Areas for Mobile Source Pollutant Concentrations**, summarizes the road segments that would operate at LOS E or LOS F as a result of the proposed project after mitigation measures presented in Section 3.12 are implemented. There is no feasible mitigation available to expand capacity and improve traffic conditions on these roadway segments. Sensitive land uses located within 500 feet of those roadway segments are also identified. This distance is commonly referenced as the limit of potential risks from elevated carbon monoxide concentration.

Carbon monoxide levels could potentially exceed acceptable levels along these road segments (and potentially at intersections along these segments due to extending idling of vehicles delayed at the intersections) during periods of highly stable atmospheric conditions. However, several factors combine to make substantial concentrations of carbon monoxide unlikely. Existing physical constraints such as high density, high profile buildings or other obstructions that could prevent dispersion of carbon monoxide are largely absent. Predominant weather conditions in the area include air movement that would help facilitate carbon monoxide dispersion. Congested traffic conditions that otherwise could result in concentration of carbon monoxide would be of short duration. Further, under existing state regulatory and legislative mandates, emissions
volumes from all classes of vehicles in the vehicle fleet will continue to decline. Given these factors, substantial concentrations of carbon monoxide are not expected at or along the noted roadway segments and the potential impact would be less than significant.

Table 18  Risk Areas for Mobile Source Pollutant Concentrations

<table>
<thead>
<tr>
<th>Location</th>
<th>LOS</th>
<th>Sensitive Receptors within 500 Feet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boronda Road - U.S. Highway 101 to North Main St.</td>
<td>E</td>
<td>Residential</td>
</tr>
<tr>
<td>West Laurel Drive - U.S. Highway 101 to Adams St.</td>
<td>F</td>
<td>Residential</td>
</tr>
<tr>
<td>Natividad Road - East Bernal Drive to East Laurel Drive</td>
<td>F</td>
<td>Residential</td>
</tr>
<tr>
<td>Alisal Road - E. Alisal Street to Hartnell Road</td>
<td>F</td>
<td>School and Residential</td>
</tr>
<tr>
<td>Castroville Road (SR 183) - Espinosa Road to SR 156 (Caltrans)</td>
<td>F</td>
<td>Residential</td>
</tr>
<tr>
<td>Crazy Horse Canyon Road - south of U.S. Highway 101</td>
<td>F</td>
<td>Residential</td>
</tr>
<tr>
<td>Espinosa Road - west of U.S. Highway 101</td>
<td>F</td>
<td>Residential</td>
</tr>
<tr>
<td>Harris Road - west of Abbott Street (portion outside the city limits)</td>
<td>F</td>
<td>Residential</td>
</tr>
<tr>
<td>San Juan Grade Road - Hebert Road and Crazy Horse Canyon Road</td>
<td>E</td>
<td>Residential</td>
</tr>
</tbody>
</table>

Source:  Google Maps 2017.

**IMPACT: POTENTIAL TO CREATE OBJECTIONABLE ODORS (LESS THAN SIGNIFICANT)**

The proposed project would include industrial land uses that could emit odors, such as agricultural processing plants. Target Area B, which is located along U. S. Highway 101, is the only location planned for industrial land uses. There are no residences or other odor-sensitive uses located within one and one-half miles of this location; and odors, if any, would not affect sensitive uses.

Air district Rule 402 prohibits any mobile or stationary source generating an objectionable odor, with the exception of odors emanating from certain agricultural operations. California Health
and Safety Code section 41700 and air district Rule 402 prohibit emissions of air contaminants from any source that cause nuisance or annoyance to a considerable number of people or that present a threat to public health or cause property damage. Compliance with these rules would preclude land uses proposed under the proposed project from emitting objectionable odors. Therefore, the proposed project would not result in significant objectionable odors.

### 3.4 Biological Resources

This section addresses existing biological resources located within Target Areas B, N, L2, K, F, and V. This evaluation is based on the following information: a biological reconnaissance field survey conducted by EMC Planning Group biologists; a review of existing scientific literature, aerial photographs, and technical background information; and policies and programs applicable to projects located in the City.

Information is this section is derived from a variety of sources including:

- *City of Salinas General Plan Final Program EIR* (Cotton/Bridges/Associates 2002);
- *Biological Assessment – Existing Conditions Report* (Biotic Resources Group 2001);
- *Biological Assessment – Impact Analysis City of Salinas General Plan* (Biotic Resources Group 2002);
- California Natural Diversity Database (CNDDDB), (California Department of Fish and Wildlife 2017);
- Inventory of Rare and Endangered Plants [California Native Plant Society (CNPS) 2017];
- Threatened and Endangered Species List, Monterey County [U.S Fish and Wildlife Service (USFWS) 2017]; and

LandWatch submitted a comment on the NOP regarding the potential impacts to biological resources. The comment letter suggests that converting agricultural land to urban use at the margins of the City indirectly results in conversion of open space at the margins of the Salinas Valley by displacing agricultural production to the margins of the Salinas Valley. This issue is discussed in Section 3.2, Agriculture and Forest Resources and in Section 3.14, Water Supply and Groundwater Resources.
Environmental Setting

EMC Planning Group biologists conducted biological reconnaissance field surveys on August 13, 18, and 20, 2015 to document existing plant communities/wildlife habitats and to evaluate the potential for special-status species to occur in the F, K, L1/2, N, B and V Target Areas. Qualitative estimations of plant cover, structure, and spatial changes in species composition were used to determine plant communities and wildlife habitats; and habitat quality and disturbance level were described. The biological reconnaissance field surveys included general observations about biological resource conditions observable at the time of the surveys. These surveys did not constitute focused surveys for any particular biological resource or protected plan or wildlife species.

Special-status species in this report are those listed as Endangered, Threatened, or Rare, or as Candidates for listing by the U.S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW); or listed as Rare Plant Rank 1B or 2B species by the California Native Plant Society (CNPS). The special-status designation also includes CDFW Species of Special Concern and Fully Protected species. Special-status species are generally rare, restricted in distribution, declining throughout their range, or have a critical, vulnerable stage in their life cycle that warrants monitoring.

Note that USFWS Species of Concern is an informal designation that refers to species that might be in need of concentrated conservation actions; USFWS Species of Concern receive no legal protection, and the use of the term does not necessarily mean that the species will eventually be proposed for listing as a Threatened or Endangered species. Therefore, USFWS Species of Concern are not included in this report as special-status species.

A search of the CDFW California Natural Diversity Database was conducted for the Moss Landing, Prunedale, San Juan Bautista, Marina, Salinas, Natividad, Seaside, Spreckels, and Chualar United States Geological Survey (USGS) quadrangles in order to evaluate potentially occurring special-status plant and wildlife species in the vicinity (CDFW 2017). Records of occurrence for special-status plants were reviewed for those same USGS quadrangles in the CNPS Inventory of Rare and Endangered Plants (CNPS 2017). A USFWS Endangered Species Program Threatened and Endangered species list was also generated for Monterey County (USFWS 2017a). The USFWS National Wetlands Inventory (USFWS 2015b) was also reviewed.

Target Areas

The Target Areas are located within the Salinas and Natividad U.S. Geological Survey (USGS) quadrangles, where coastal vegetation predominates, but chaparral and other non-coastal vegetation also occur. The climate in the area is Mediterranean, with warm and dry summers, and winters tending to be cool and wet. Most of the annual rainfall occurs between the months of December and March.
Plant Communities/Land Uses

Table 19, Plant Communities/Land Uses Found in Each Target Area, lists each plant community found in the individual Target Areas at the time of the surveys. Figures 11 to 13, Habitat Map - North, Central, and South, respectively, show the dominant plant communities in these areas. Known linear aquatic features, such as Natividad Creek and major agricultural drainages, are shown within the Target Areas and the project vicinity due to their potential sensitivity as special-status species habitat and/or the possibility the features fall under the jurisdiction of one or more resource agencies. The maps are not intended to provide site specific detail. Their purpose is to identify representative communities and land uses at a broad planning level. Where small patches of one or more habitat type are located within a much larger dominant habitat type, the small inclusion may not be labeled. However, an effort was made to map freshwater marsh, open water, and wetland habitat types at a higher level of detail due to their potential sensitivity. For any new development proposed within a Target Area, site specific biological resource investigation will be required.

Table 19  Plant Communities/Land Uses Found in Each Target Area

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Plant Communities/Land Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>B</td>
<td>Agricultural, annual grassland/ruderal</td>
</tr>
<tr>
<td>F</td>
<td>Agricultural, annual grassland/ruderal</td>
</tr>
<tr>
<td>K</td>
<td>Agricultural, annual grassland/ruderal, ornamental, urban</td>
</tr>
<tr>
<td>L2</td>
<td>Agricultural, ornamental</td>
</tr>
<tr>
<td>N</td>
<td>Agricultural, annual grassland/ruderal, ornamental</td>
</tr>
<tr>
<td>V</td>
<td>Agricultural, annual grassland/ruderal, riparian, freshwater marsh</td>
</tr>
</tbody>
</table>

Source: EMC Planning Group 2016

Active row crop production is the dominant plant community/land use. Active row crop uses are commonly bordered with strips and patches of non-native annual grassland/ruderal (weedy) vegetation along the field margins, and patches of non-native ornamental (landscaped) vegetation associated with urban and rural development.

As shown on the habitat maps, some Target Areas support small isolated patches of riparian vegetation, presumably sustained by agricultural run-off. Target Area V is within Carr Lake, a mesic area where Natividad Creek and Gabilan Creek converge and where a majority of storm water run-off from Salinas is collected. The Carr Lake area includes the reclamation ditch, an
engineered channel that drains through Carr Lake and flows northwest towards Castroville. The reclamation ditch system collects water from numerous discharge points after its three main branches converge at historic Carr Lake. It then converges with channelized sloughs near Castroville and ultimately enters Monterey Bay at Moss Landing Harbor. Carr Lake provides storm water runoff detention before waters enter the reclamation ditch. Carr Lake is primarily farmed during the dry season.

**Agricultural.** All of the Target Areas contain vegetation related to agricultural production. Vegetation in agricultural areas is primarily limited to row crop plants in active cultivation, fallow agricultural fields, or bare/disked ground. Strips and patches of non-native, weedy species are sometimes found around the field perimeters and adjacent to access roads. Annual grassland species may also occur along agricultural roads and ditches. Species observed during the site visit are common within disturbed areas within Monterey County and include wild oats (*Avena* sp.), ripgut grass (*Bromus diandrus*), wild radish (*Raphanus sativus*), cheeseweed (*Marva parvifolia*), prickly lettuce (*Lactuca serriola*), bristly ox-tongue (*Helminthotheca echioideae*), and field bindweed (*Convolvulus arvensis*).

Wildlife observed during the biological surveys included turkey vulture (*Cathartes aura*), common raven (*Corvus corax*), Brewer’s blackbird (*Euphagus cyanocephalus*), red-winged blackbird (*Agelaius phoeniceus*), killdeer (*Charadrius vociferus*), black phoebe (*Sayornis nigricans*), California horned lark (*Eremophila alpestris actia*), and mourning dove (*Zenaida macroura*). In addition, signs, tracks, or individuals of California ground squirrel (*Spermophilus beecheyi*), raccoon (*Procyon lotor*), black-tailed deer (*Odocoileus hemionus columbianus*), and coyote (*Canis latrans*) were observed.

**Annual Grassland/Ruderal.** All of the Target Areas contain pockets of annual grassland/ruderal (weedy) vegetation along field margins and roadways or within fallow agricultural or grazing areas. As discussed above, these areas include annual and perennial non-native species such as wild oats, ripgut grass, rescue grass (*Bromus catharticus*), barley (*Hordeum murinum*), barnyard grass (*Echinochloa crus-galli*), cheeseweed, bristly ox-tongue, field bindweed, lamb's quarters (*Chenopodium album*), common sow thistle (*Sonchus oleraceus*), common horseweed (*Erigeron canadensis*), shortpod mustard (*Hirschfeldia incana*), curly dock (*Rumex crispus*), Italian thistle (*Carduus pycnocephalus var. pycnocephalus*), prickly lettuce, cut-leaved plantain (*Plantago coronopus*), and English plantain (*Plantago lanceolata*).

Wildlife observed in annual grassland during the biological surveys included red-tailed hawk (*Buteo jamaicensis*), American kestrel (*Falco sparverius*), bushtit (*Psaltriparus minimus*), yellow-rumped warbler (*Dendroica coronata*), Anna’s hummingbird (*Calypte anna*), Brewer’s blackbird, red-winged blackbird, white-crowned sparrow (*Zonotrichia leucophrys*), golden-crowned sparrow (*Zonotrichia atricapilla*), black phoebe, mourning dove, American goldfinch (*Carduelis tristis*), lesser goldfinch (*Carduelis psaltria*), and house finch (*Carpodacus mexicanus*). Additional species
Salinas Economic Development Element Program EIR

Habitat Map - North

Figure 11


*Note: Plant communities in Target Areas have only been preliminarily mapped. Additional survey work will be required.

Plant Communities/Land Uses

1 Agricultural
2 Annual Grassland/Ruderal
3 Urban

Aquatic Features

Freshwater Marsh/Open Water

Target Areas

Target Area K

Target Area L1
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Salinas Economic Development Element Program EIR

Figure 12
Habitat Map - Central

Plant Communities/Land Uses
1 Agricultural
2 Annual Grassland/Ruderal
3 Urban
4 Freshwater Marsh

Target Areas

Aquatic Features


*Note: Plant communities in Target Areas have only been preliminarily mapped. Additional survey work will be required.
*Note: Plant communities in Target Areas have only been preliminarily mapped. Additional survey work will be required.
This side intentionally left blank.
that are expected in this habitat include California vole (*Microtus californicus*), Botta’s pocket gopher (*Thomomys bottae*), striped skunk (*Mephitis mephitis*), California ground squirrel, raccoon, black-tailed deer, coyote, western fence lizard (*Sceloporus occidentalis*), terrestrial garter snake (*Thamnophis elegans*), western rattlesnake (*Crotalus viridis*), and gopher snake (*Pituophis melanoleucus*). Common bats such as the Mexican free-tailed bat (*Tadaria brasiliensis*) and big brown bat (*Eptesicus fuscus*) could roost in outbuildings, barns, or trees and forage in the fields.

**Ornamental/Urban.** Ornamental or urban vegetation is found in Target Areas K, L2, and N. Vegetation in ornamental/urban areas may also contain annual grassland species; however, non-native ornamental (landscaped) species are dominant. Species found during the surveys (in addition to those listed above) include gum trees (*Eucalyptus* sp.), garden nasturtium (*Tropaeolum majus*), sweet alyssum (*Lobularia maritima*), and various other planted trees and shrubs.

Wildlife species observed include red-shouldered hawk (*Buteo lineatus*), red-tailed hawk, bushtit, black phoebe, yellow-rumped warbler, orange-crowned warbler, golden-crowned sparrow, white-crowned sparrow, chestnut-backed chickadee, lesser goldfinch, American goldfinch, western scrub-jay (*Aphelocoma californica*), European starling (*Sturnus vulgaris*), American crow (*Corvus brachyrhynchos*), oak titmouse (*Baeolophus inornatus*), ruby-crowned kinglet (*Regulus calendula*), house sparrow (*Passer domesticus*), western gull (*Larus occidentalis*), rock pigeon (*Columba livia*), and California towhee (*Melospiza melodia*). Urban adapted wildlife such as Virginia opossum (*Didelphis virginiana*) and raccoon are also expected to occur.

**Freshwater Marsh/Open Water.** Freshwater marsh or open water is found within Target Area V. Freshwater marsh is typically dominated by perennial, emergent monocots one to 15 feet in height (Holland 1986). It typically occurs on sites that lack a significant current and are permanently flooded by freshwater along the edges of water bodies, dune swales, slough terrace edges, banks, channels, and mouth margins of rivers, bottomlands, ditch margins, lagoons, ponds, reservoir margins, and along geologic faults. Plant species observed in these areas include southern bulrush (*Schoenoplectus californicus*), Baltic rush (*Juncus balticus*), cocklebur (*Xanthium strumarium*), water pepper (*Persicaria hydropiperoides*), yellow waterweed (*Ludwigia peploides*), water cress (*Nasturtium officinale*), and umbrella-sedge (*Cyperus* sp.).

Wildlife species observed and/or expected to occur in this habitat include sora (*Porzana carolina*), American coot (*Fulica americana*), marsh wren (*Cistothorus palustris*), common yellowthroat (*Geothlypis trichas*), song sparrow (*Melospiza melodia*), great blue heron (*Ardea herodias*), killdeer, mallard (*Anas platyrhynchos*), red-winged blackbird, barn swallow (*Hirundo rustica*), Pacific chorus frog (*Pseudacris regilla*), gopher snake, raccoon, coyote, and black-tailed deer.

**Riparian.** Riparian vegetation is found within Target Area V. Riparian areas consist of mainly two types: riparian scrub and riparian woodland. Riparian scrub is a streamside thicket, varying from open to impenetrable, and dominated by willow species. This community establishes early
after severe flooding events, and graduates to riparian woodland as tree species have a chance to establish over time. Species observed include red willow (Salix laevigata), arroyo willow (Salix lasiolepis), pacific willow (Salix lasiandra var. lasiandra), coast live oak (Quercus agrifolia), valley oak (Quercus lobata), white alder (Alnus rhombifolia), black cottonwood (Populus trichocarpa), western sycamore (Platanus racemosa), blue elderberry (Sambucus nigra ssp. caerulea), box elder (Acer negundo), coyote brush (Baccharis pilularis), California rose (Rosa californica), Himalayan blackberry (Rubus armeniacus), California blackberry (Rubus ursinus), western poison oak (Toxicodendron diversilobum), mugwort (Artemisia douglasiana), willow-herb (Epilobium ciliatum), and hoary nettle (Urtica dioica ssp. holosericea).

Wildlife species observed and expected include Cooper’s hawk, red-tailed hawk, bushtit, chestnut-backed chickadee, song sparrow, white-crowned sparrow, golden-crowned sparrow, fox sparrow (Passerella iliaca), California towhee, red-winged blackbird, Nuttall’s woodpecker (Picoides nuttallii), downy woodpecker (Picoides pubescens), hairy woodpecker (Picoides villosus), northern Flicker (Colaptes auratus), western scrub-jay, tree swallow (Tachycineta bicolor), violet-green swallow (Tachycineta thalassina), oak titmouse (Baeolophus inornatus), Bewick’s wren (Thryomanes bewickii), ruby-crowned kinglet (Regulus calendula), hermit thrush (Catharus guttatus), Wilson’s warbler (Cardellina pusilla), black-headed grosbeak (Pheucticus melanocephalus), warbling vireo (Vireo gilvus), western fence lizard, Pacific chorus frog, western yellow-bellied racer (Coluber constrictor mormon), aquatic garter snake (Thamnophis atratus), California kingsnake (Lampropeltis californiae), California ground squirrel, western gray squirrel (Sciurus griseus), bobcat (Lynx rufus), gray fox (Urocyon cinereoargenteus), coyote, and black-tailed deer.

**Wetlands and Waters of the U.S.**

The United States Army Corps of Engineers (USACE) regulates impacts to two general categories of aquatic features: wetlands and other waters of the U.S. Wetlands are areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soils. Other waters of the U.S. are tributaries of and waters utilized for interstate or foreign commerce as well as all other waters such as interstate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce.

As shown in Table 19, Target Area V contains riparian scrub/woodland and freshwater marsh plant communities. Wetland and waterway features may be under the jurisdiction of USACE and other regulatory agencies.
**Special-Status Species**

Special-status species are defined as any species which is officially listed, or a proposed candidate for listing, as rare, threatened, or endangered by the USFWS, National Marine Fisheries Service, and/or CDFW under the state and/or federal Endangered Species Acts. This designation also includes CDFW Species of Special Concern and Fully Protected species, CNPS Rare Plant Rank 1B and 2 species, and other species that meet the criteria for being considered endangered or rare, as described in Section 15380 of CEQA Guidelines.

Special-status species are generally rare, restricted in distribution, declining throughout their range, or have a critical, vulnerable stage in their life cycle that warrants monitoring. Appendix G contains two tables: Special-Status Plants Potentially Occurring in the Vicinity of the Target Areas, and Special-Status Wildlife Potentially Occurring in the Vicinity of the Target Areas. These tables are lists of special-status species documented within the project vicinity (i.e. the Moss Landing, Prunedale, San Juan Bautista, Marina, Salinas, Natividad, Seaside, Spreckels, and Chualar USGS quadrangles), including their listing status and suitable habitat description, and their potential to occur. Additional discussion of species with the potential to occur within the Target Areas is included below.

**Special-Status Plants**

Because the Target Areas are predominantly disturbed by agricultural operations, the areas contain limited habitat that could support special-status plants known to occur in the vicinity. However, Congdon’s tarplant, considered special-status by the CNPS, is known to occur within the city limits and vicinity and is discussed in further detail below.

**Congdon’s Tarplant.** The CNPS rare plant rank 1B Congdon’s tarplant (Centromadia parryi ssp. congonii) occurs on a range of substrates, and is tolerant of disturbed and ruderal (weedy) areas. Within Salinas and the vicinity, it occurs in patches of non-native grassland. This low-growing annual herb is most observable during its peak blooming period, from late summer to early fall. CNPS rare plant rank 1B species are considered rare, threatened, or endangered in California and elsewhere. The City has determined that impacts to such species require mitigation under CEQA because all CNPS 1B species meet the definitions of “endangered” or “rare” found in CEQA Guidelines section 15380, subdivision (b). (See *Sierra Club v. City of Gilroy* (1990) 222 Cal.App.3d 30, 47 [section 15380 gives lead agencies the discretion to treat a species not formally listed as endangered or threatened under the California Endangered Species Act as though the species met the criteria for listing under that statutory scheme].)

Due to the affinity of Congdon’s tarplant for disturbed areas and strips of ruderal vegetation, it could occur within any of the Target Areas. This species was identified in disturbed non-native
grassland habitat within the vicinity, but not within, Target Area V during the reconnaissance field surveys. In addition to this occurrence, CNDDDB records have documented this species from 1992 to 2002 as occurring at eight locations within five miles of the Target Areas.

**Special-Status Wildlife**

The Special-Status Wildlife Potentially Occurring in the Project Vicinity table included in Appendix G shows special-status wildlife species documented within the project vicinity, their listing status and suitable habitat description, and their potential to occur within the Target Areas.

**Steelhead (Oncorhynchus mykiss irideus).** The Federally threatened (South-Central California Coast Evolutionary Significant Unit) and State Species of Special Concern Steelhead is an anadromous fish that relies on streams, rivers, estuaries, and marine habitats during its lifecycle. Adult steelhead migrate from the ocean up streams and rivers where they lay eggs (spawn) in areas with small- to medium-sized gravel in riffles with good oxygen flow. The eggs take from 1.5 to 4 months to hatch. Hatchlings remain in the gravel until their yolk is absorbed, and then emerge and actively feed. Young steelhead typically remain in freshwater creeks and rivers from one to four years before migrating to the ocean where they spend two to three years before returning to their natal stream to spawn. Spawning typically occurs between December and June. According to the General Plan (2002), steelhead have been detected in upper Gabilan Creek. Also, Tembladero Slough and Gabilan Creek are USFWS designated Critical Habitat for this species. This species may also occur within aquatic habitats in Target Area V.

**California Tiger Salamander (CTS) (Ambystoma californiense).** The federally and state-listed Threatened California tiger salamander is a large terrestrial salamander. It occurs in central California from the Sacramento Valley to the south-central San Joaquin Valley, and in the surrounding foothills of both the Coast Ranges and the Sierra Nevada Mountains. California tiger salamanders are also recorded from the San Francisco Bay region, Sonoma County, the Monterey Bay region, and the valleys and foothills of San Luis Obispo and Santa Barbara counties.

California tiger salamanders breed in temporary wetland pools, such as vernal pools, and other seasonal wetland bodies where ponded water is present for a minimum of three to four months, extending into the early spring. Such ponds and temporary wetlands provide necessary breeding and larval-stage habitat for the species. Adults spend most of the year in aestivation, underground in the burrows of small mammals, such as the California ground squirrel and/or Botta’s pocket gopher, or within other suitable subterranean retreats. They emerge at night during winter rain events for brief periods to breed (Trenham et al. 2001). Aquatic juveniles (larvae) are mostly herbivorous (Stebbins 1985). California tiger salamanders normally begin to reproduce after three to five years.
CNDDB records from 2002 to 2004 included documented occurrence of a metapopulation of hybrid tiger salamanders in the Natividad Creek and Gabilan Creek drainages and surrounding stock ponds and agricultural ponds outside of the current urban boundary near Target Area V (CNDDB 2016). A metapopulation is a population of populations, or a group of groups, that is made up of the same species. Each subpopulation, or subgroup, is separated from all other subpopulations, but movement of individuals from one population to another occurs regularly.

**California Red-legged Frog (CRLF) (Rana draytonii).** A federally listed Threatened species and California Species of Special Concern, CRLF occurs in lowlands and foothills primarily in perennial or ephemeral ponds, pools, and streams where water remains long enough (14-28 weeks) for breeding and metamorphosis of tadpoles. Specific breeding sites include streams, creeks, ponds, marshes, sag ponds, deep pools, backwater areas, dune ponds, lagoons, and estuaries. Habitats with the highest densities of CRLF often contain dense emergent or shoreline riparian vegetation closely associated with fairly shallow (< 0.5 meter) to deep (> 0.5 meter), still, or slow-moving water (USFWS 2002).

CRLF may disperse from their aquatic breeding habitats to upland habitats during the dry season. They prefer upland habitats that provide moisture to prevent desiccation and protection from predators, including downed logs, woody vegetation, boulders, moist leaf litter, or other refugia during the dry season. In areas where upland habitats do not contain structure, they take refuge in burrows (phone conversation with Trish Tatarian of Elkhorn Slough Coastal Training Program, October 22, 2015). However, if there is sufficient water at their breeding location, they may remain in aquatic habitats year-round instead of moving to adjacent uplands.

During wet seasons, frogs can move long distances between habitats, traversing upland areas or ephemeral drainages. Dispersal distances are typically less than 0.5 km (0.3 mile), with a few individuals moving 2.0-3.6 kilometers (1.2-2.2 miles) (Bulger et al. 2003). Seeps and springs in open grasslands can function as foraging habitat or refugia for wandering frogs (Jennings and Hayes 1994).

This species has been detected in the Natividad Creek drainage to the northeast of the City, and has potential to occur in Natividad Creek Park and Carr Lake, or in isolated stock ponds or drainage canals present throughout the City and vicinity, including Target Area V. However, it requires emergent vegetation to breed, and ponds free of invasive predators. The stock ponds observed during the field reconnaissance visits did not have emergent vegetation, lacked suitable upland habitats, and presented low quality breeding habitat for this species. However, migrating individuals could occur when traveling along drainages within Target Area V.

**Western Pond Turtle (WPT) (Emys marmorata).** A state Species of Special Concern, WPT occurs in both perennial and intermittent waters, including marshes, streams, rivers, ponds, and lakes. It favors habitats with emergent logs or boulders, where individuals aggregate to bask.
WPT may lay their eggs as far as one-half mile from the nearest source of water, but most nests are within 300 feet from water. WPT has been detected in the Natividad Creek north of Target Area V in 2004 (CNDDB 2016), and has low potential to occur within Natividad and Gabilan creeks, at Natividad Creek Park, and at Carr Lake, including Target Area V.

**Burrowing Owl** (*Athene cunicularia*). Western burrowing owl is a state Species of Special Concern. Burrowing owls live and breed in burrows in the ground, especially in abandoned ground squirrel burrows. Optimal habitat conditions include large open, dry, and nearly level grasslands or prairies with short to moderate vegetation height and cover, areas of bare ground, and populations of burrowing mammals. Resident burrowing owls are known to occur near the Salinas Municipal Airport and the farms south of Salinas, where the agricultural fields, hedgerows, and remnant patches of grassland provide suitable foraging habitat for burrowing owls. Areas with active colonies of California ground squirrels or manmade structures that could be utilized for nesting such as culverts provide suitable nesting habitat. Burrowing owls are likely to occur in areas with burrows and suitable foraging habitat, which includes grassland or ruderal vegetation found within any of the Target Areas.

**Northern Harrier** (*Circus cyaneus*). A state Species of Special Concern, northern harrier nests in large areas of wetlands and grasslands with low, thick vegetation. They breed in freshwater and brackish marshes, lightly grazed meadows, farm fields, old fields, and riparian areas. Northern harriers forage in a wide variety of habitats with short vegetation, such as salt marsh, freshwater marsh, grassland, coastal scrub, ruderal, and agricultural fields with available prey such as small mammals, reptiles, amphibians, and birds. Northern harrier may breed within the vicinity of Target Area V; however, the frequently disturbed agricultural vegetation found within the Target Area is unlikely to support breeding activity. This species may forage within agricultural fields, annual grassland, marsh, or riparian habitats within any of the Target Areas.

**Tricolored Blackbird** (*Agelaius tricolor*). Tricolored blackbird is a federal and state Species of Special Concern. This colonially nesting species utilizes emergent vegetation such as cattails, bulrushes, Himalayan blackberry, or agricultural silage that is flooded, spinous, or difficult to access for mammalian predators. It forages in farm fields, especially rice, or in feedlots where it is often found with other blackbirds and starlings. A nesting colony was recorded at a stock pond with emergent vegetation in the vicinity of Target Area F. Areas of open water north of and within Target Area V may also contain suitable habitat.

**White-tailed Kite** (*Elanus leucurus*). A state Fully Protected Species, the white-tailed kite occurs in rolling foothills, valley margins with scattered oaks, savannas, open woodlands, and marshes or river bottomlands near deciduous woodlands. White-tailed kites hunt in lightly grazed or ungrazed fields where there may be larger prey populations than in more heavily grazed areas. This species has been recorded in the marsh and riparian areas around Carr Lake, and may forage within annual grassland, ruderal, marsh, or riparian habitats within any of the Target Areas.
Yellow Warbler (*Setophaga petechial*). A federal and state Species of Special Concern, the yellow warbler is a neo-tropical migrant that nests in the United States and Canada and overwinters in Central and South America. This species typically nests in willow riparian vegetation in California. This species may occur within riparian vegetation or in isolated patches of willows found within Target Area V.

Yellow-breasted Chat (*Icteria virens*). A state Species of Special Concern, the yellow-breasted chat is a neo-tropical migrant that nests in the United States and Canada and overwinters in Central America. This species nests in areas with dense vegetation, including abandoned farm fields, clearcuts, powerline corridors, fencerows, forest edges and openings, swamps, and riparian areas near streams and ponds. It nests in low, dense vegetation such as blackberry thickets in riparian zones. This species may occur within riparian vegetation, willow thickets, or other dense vegetation or in isolated patches of willows found within Target Area V.

Pallid Bat (*Antrozous pallidus*). Pallid bats are listed as a state Species of Special Concern. Pallid bats can be found in a variety of habitats, and are not considered migratory, preferring to move within a region on a seasonal basis. Day roosts are found in buildings, crevices, caves, mines, and hollow trees. Maternity roosts are colonial and sensitive to noise and disturbance. This species may roost within riparian vegetation or trees found in the vicinity of Target Area V, and forage in ruderal grassland habitats within any of the Target Areas.

Townsend’s Western Big-eared Bat (*Corynorhinus townsendii*). The Townsend’s western big-eared bat is a California Species of Special Concern and state Candidate Threatened species. This species occurs in a variety of habitats throughout California, including coastal conifer and broad-leaf forests, oak and conifer woodlands, arid grasslands, and high-elevation forests. In coastal California, this species is typically associated with riparian forests. Roosting sites include limestone caves, lava tubes, mine tunnels, buildings, and other artificial structures within 100 meters of riparian habitat. Roosting sites are easily disturbed by noise and activity. This species may occur within riparian vegetation found in the vicinity of or within Target Area V.

Yuma Myotis (*Myotis yumanensis*). The Yuma myotis is a California Species of Special Concern. This species occurs in a variety of habitats throughout California, and typically forages over the surface of calm waters of ponds, streams, and rivers. This species may occur within riparian vegetation found in the vicinity of or within Target Area V.

Monterey Dusky-footed Woodrat (*Neotoma fuscipes luciana*). A state Species of Special Concern, the Monterey dusky-footed woodrat occurs in a variety of woodland and scrub habitats in Monterey County. Woodrats occur in riparian and oak woodland forests or thick chaparral habitat. Dusky-footed woodrats build large, complex nests of sticks and other woody debris. Nests are typically located near the bases of trees or shrubs, under snags, under dense brush, in the lowest branches of trees, and are often found within riparian areas. Dusky-footed woodrats favor dense canopy cover and areas with poison oak. The breeding season generally begins in
February and continues through September, and females have a single brood per year (Carraway and Verts 1991). Woodrat nests were observed in the riparian area of Natividad Creek north of Target Area V. This species may occur within riparian vegetation found in the vicinity of or within this Target Area.

**Sensitive Natural Communities.** Sensitive natural communities are defined by local, state, or federal agencies as habitats that support special-status species, provide important habitat values for wildlife, represent areas of unusual or regionally restricted habitat types, and/or provide high biological diversity. Aquatic habitats such as coastal and valley freshwater marsh, riparian, and pond habitats are found within Target Area V and are considered sensitive natural communities.

**Wildlife Movement**

Wildlife movement includes migration (i.e., usually movement one way per season), inter-population movement (i.e., long-term dispersal and genetic flow), and small travel pathways (i.e., daily movement within an animal's territory). While small travel pathways usually facilitate movement for daily home range activities, such as foraging or escape from predators, such pathways also provide connection between outlying populations and the main populations, permitting an increase in gene flow among populations. These habitat linkages can extend for miles and occur on a large scale throughout the greater region. Habitat linkages facilitate movement between populations located in discrete locales and populations located within larger habitat areas.

Impacts from development, such as habitat fragmentation and/or isolation and the creation of impassable barriers, can cause a significant impact to wildlife corridors. Depending on the organism and its needs, movement corridors can either be continuous or discontinuous patches of suitable habitat. Preserving expanses of open space that are connected may enable species utilizing these areas as foraging or breeding habitat to persist.

The Target Areas are used predominantly for active agricultural production, which generally prohibits most overland wildlife movement due to the lack of suitable vegetative cover. Common, urban-adapted mammals such as Virginia opossum (*Didelphis virginiana*) and raccoon (*Procyon lotor*) may utilize channelized agricultural ditches as migratory corridors. Native wildlife species are more likely to utilize vegetated corridors such as Natividad Creek, Gabilan Creek, and Carr Lake for dispersal and migratory movements.

**Habitat Conservation Plans**

There are no Habitat Conservation Plans or Natural Community Conservation Plans applicable to Salinas.


Regulatory Setting

Federal

Endangered Species Act. The Federal Endangered Species Act (FESA), administered by the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS), provides protection to plant and wildlife species listed as endangered or threatened. In general, the USFWS has jurisdiction over terrestrial and fresh-water species, while the NMFS has jurisdiction over ocean-going species.

Section 9 of the FESA generally prohibits all persons from causing the "take" of any member of a listed species. (16 U.S.C. § 1538.) This prohibition applies mainly to animals; it only extends to plants in areas "under federal jurisdiction" and plants already protected under state law. (Id., subd. (a)(2)(B); see also Northern Cal. River Watch v. Wilcox (9th Cir. 2010) 620 F.3d 1075.)

"Take" is defined in statute as, "... to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." (16 U.S.C. § 1532(19).) Harass is defined in regulation as "...an intentional or negligent act or omission that creates the likelihood of injury to a listed species by annoying it to such an extent as to significantly disrupt normal behavior patterns that include, but are not limited to, breeding, feeding, or sheltering." (See 50 CFR § 17.3.) Harm is defined in regulation as "...significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering." (Id.) Despite the general prohibition against take, the FESA in some circumstances permits "incidental take," which means take that is incidental to, but not the purpose of, the carrying out of an otherwise lawful activity. (16 U.S.C. § 1539(a).) Under section 10 of the FESA, persons seeking permission to engage in actions that could result in such incidental take can obtain such permission through the approval of a habitat conservation plan (HCP) by either the USFWS or NMFS. (16 U.S.C., § 1539(a).)

Proposed federal actions that would result in take of a federally listed or proposed species require consultation with the USFWS or NMFS under section 7 of the FESA. (Id., § 1536.) The objective of consultation is to determine whether the proposed federal action would jeopardize the continued existence of a listed species or destroy or adversely modify critical habitat. Where such an outcome would not occur, the USFWS or NMFS must still impose reasonable and prudent measures to minimize the effects of the incidental taking. Where such an outcome could occur, the USFWS or NMFS must propose reasonable and prudent alternatives that, if implemented, would avoid such an outcome. (Id.)

Compliance with the FESA can be achieved under Section 7 or 10 depending on the involvement of the federal government. Section 7 requires federal agencies to make a finding on all federal actions, including the approval by an agency of a public or private action, such as the
issuance of a “404 permit” for filling wetlands by the U.S. Army Corps of Engineers (USACE), on the potential of the action to jeopardize the continued existence of any listed species impacted by the action or to result in the destruction or adverse modification of such species’ critical habitat. Provisions of Section 10 are implemented when there is no federal involvement in a project except compliance with the FESA. A take not specifically allowed by federal permit under Section 7 or Section 10(a)(1)(B) of the FESA is subject to enforcement through civil or criminal proceedings under Section II of the FESA.

**Migratory Bird Treaty Act.** The federal Migratory Bird Treaty Act (MBTA) of 1989 prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. This Act encompasses whole birds, parts of birds, bird nests, and eggs. (See 16 USCA § 703.)

**Clean Water Act.** Section 404 of the Clean Water Act of 1972 regulates the discharge of dredge and fill material into “Waters of the U.S.,” including wetlands. Certain natural drainage channels and wetlands are considered jurisdictional “Waters of the U.S.” The U.S. Army Corps of Engineers (USACE) is responsible for administering the Section 404 permit program. The agency determines the extent of its jurisdiction as defined by ordinary high water marks on channel banks. Wetlands are habitats with soils that are intermittently or permanently saturated, or inundated. The resulting anaerobic conditions naturally select for plant species known as hydrophytes that show a high degree of fidelity to such soils. Wetlands are identified by the presence of hydrophytic vegetation, hydric soils (soils intermittently or permanently saturated by water), and wetland hydrology according to methodologies outlined in the 1987 Corps of Engineers Wetlands Delineation Manual and the 2006 Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region.

Activities that involve the discharge of fill into jurisdictional waters are subject to the permit requirements of the USACE. Discharge permits are typically issued on the condition that the project proponent agrees to provide compensatory mitigation that results in no net loss of wetland area, function, or value, either through wetland creation, restoration, or the purchase of wetland credits through an approved wetland mitigation bank. In addition to individual discharge permits, the USACE also issues nationwide permits applicable for certain activities.

**State Plans, Regulations, and Advisory Documents**

**California Endangered Species Act.** The California Department of Fish and Wildlife (CDFW) administers a number of laws and programs designed to protect fish and wildlife resources. Principal of these is the California Endangered Species Act of 1984 (CESA Fish and Game Code Section 2050 et seq.), which regulates the listing and take of state endangered and threatened species, as well as candidate species. Under Section 2081 of the CESA, the CDFW may authorize take of an endangered and/or threatened species, or candidate species, by a permit or
Memorandum of Understanding (MOU) for scientific, educational, or management purposes. In approving an incidental permit, the CDFW must ensure, among other things, that “[t]he impacts of the authorized take shall be minimized and fully mitigated.” Further, “[t]he measures required to meet this obligation shall be roughly proportional in extent to the impact of the authorized taking on the species. Where various measures are available to meet this obligation, the measures required shall maintain the applicant's objectives to the greatest extent possible. All required measures shall be capable of successful implementation.”

**Native Plant Protection Act.** The legal protection afforded listed plants under this act includes provisions that prohibit the taking of plants from the wild and impose a salvage requirement for landowners. If a landowner has been informed of a listed plant species on his property, the CDFW must be notified at least 10 days in advance of any land use change that might affect the species or its habitat, thereby affording the CDFW an opportunity to conduct a salvage operation. Candidate species are also protected from taking by the Native Plant Protection Act (Fish & G. Code, §§ 1900-1913).

The CDFW has demonstrated a general policy of regarding many of the plants with the California Native Plant Society’s (CNPS) Rare Plant Ranks 1B and 2B as meeting the definitions of Chapter 10, Section 1901 of the Native Plant Protection Act. As such, those plants also qualify for protection under the California Environmental Quality Act (CEQA). In addition, plants with CNPS Rare Plant Ranks 3 and 4, as well as unique plant communities are usually informally protected under this act.

**Natural Communities Conservation Planning Act.** The Natural Communities Conservation Planning Act is set forth in Fish and Game Code Sections 2800–2835. The intent of the legislation is to provide for conservation planning as an officially recognized policy that can be used as a tool to eliminate conflicts between the protection of natural resources and the need for growth and development. In addition, the legislation promotes conservation planning as a means of coordination and cooperation among private interests, agencies, and landowners, and as a mechanism for multispecies and multi-habitat management and conservation. The development of Natural Community Conservation Plans (NCCPs) is an alternative to obtaining take authorization under Section 2081 of the Fish and Game Code.

**Nesting Birds and Birds of Prey.** Sections 3505, 3503.5, and 3800 of the California Fish and Wildlife Code prohibit the take, possession, or destruction of birds, including their nests or eggs. Birds of prey (the orders Falconiformes and Strigiformes) are specifically protected in California under provisions of the California Fish and Wildlife Code, Section 3503.5. This section of the Code establishes that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this Code. Disturbance that causes nest abandonment and/or loss of reproductive effort, such as construction during the breeding season, is considered take by the CDFW.
3.0 Environmental Setting, Impacts and Mitigation Measures

**Fully Protected Species.** California Fish and Game Code Sections 3511, 3513, 4700, and 5050 pertain to fully protected wildlife species (birds in Sections 3511 and 3513, mammals in Section 4700, and reptiles and amphibians in Section 5050) and strictly prohibit the take of these species. The CDFW cannot issue a take permit for fully protected species, except under narrow conditions for scientific research or the protection of livestock, or if an NCCP has been adopted.

**Streambed Alterations.** The CDFW has jurisdiction over the bed and bank of natural drainages according to provisions of Sections 1601 through 1603 of the California Fish and Game Code. Diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that support wildlife resources and/or riparian vegetation are subject to CDFW regulations. Activities that would disturb these drainages are regulated by the CDFW; authorization is required in the form of a Streambed Alteration Agreement. Such an agreement typically stipulates measures that will protect the habitat values of the drainage in question.

**California Porter-Cologne Water Quality Control Act.** The Porter-Cologne Water Quality Control Act (Wat. Code, § 13000 et seq.) is California’s primary water quality control statute. But its protections extend to wetlands, and in some instances wetlands that are not subject to federal jurisdiction under the Clean Water Act. Under the Porter-Cologne Act definition, waters of the state are “any surface water or groundwater, including saline waters, within the boundaries of the state.” (Wat. Code, § 13050[e].) Although all waters of the United States that are within the borders of California are also waters of the state, the reverse is not necessarily true. Therefore, California retains authority to regulate discharges of waste into any waters of the state, discharges to receiving waters more broadly than the CWA does.

Waters of the state fall under the jurisdiction of the nine Regional Water Quality Control Boards (RWQCBs). Under Porter-Cologne, each RWQCB must prepare and periodically update water quality control basin plans. Each basin plan sets forth water quality standards for surface water and groundwater, as well as actions to control nonpoint and point sources of pollution. California Water Code Section 13260 requires any person discharging waste, or proposing to discharge waste, in any region that could affect the waters of the state to file a report of discharge (an application for waste discharge requirements [WDRs]) with the applicable RWQCB. Construction activities that may discharge wastes into the waters of the state must meet the discharge control requirements of the Porter-Cologne Act.

Also, under Section 401 of the Clean Water Act, any activity requiring a USACE Section 404 permit must also obtain a state Water Quality Certification (or waiver thereof) to ensure that the proposed activity will meet state water quality standards. The applicable state RWQCB is responsible for administering the water quality certification program and enforcing National Pollutant Discharge Elimination System (NPDES) permits.
**Burrowing Owls.** Take of individual burrowing owls and their nests is prohibited by Sections 3503, 3503.5, and 3513 of the Fish and Game Code. Section 86 of the Code defines take as “hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill.” Per the 2012 CDFW *Staff Report on Burrowing Owl Mitigation*, various activities have the potential to be defined as take with regard to burrowing owls, their nests or eggs, or their habitat, including: grading, diskng, cultivation, earthmoving, burrow blockage, heavy equipment compacting and crushing burrow tunnels, levee maintenance, flooding, burning and mowing, and operating wind turbine collisions. Impacts to adjacent burrowing owl habitat should also be avoided in order to avoid harassment of owls at occupied burrows. In order to evaluate whether projects will result in impacts to burrowing owls, a habitat assessment, site surveys, and an impact assessment may be performed. Only those biologists meeting the minimum qualifications defined in the Staff Report should perform these evaluations.

Site-specific avoidance or mitigation measures may be developed in order to seasonally and spatially avoid negative impacts to burrowing owls. These may include: avoiding disturbing occupied burrows during the breeding season from February 1 through August 31, avoiding impacts to occupied burrows during the non-breeding season, restricting the use of poison bait to mammals, or other, similar measures. Various, additional techniques to minimize impacts to burrowing owls may also be implemented. Follow-up monitoring may be required in order to compare between original site conditions and conditions after mitigation measures have been undertaken.

For unavoidable impacts to burrowing owl habitat, compensatory mitigation may also be required. Compensation may take the form of acquiring and dedicating lands into conservation easements, purchasing mitigation credits at compensation ratios that have been approved during coordination with the CDFW, and preserving area contiguous or near the acreage lost.

**Local Plans and Regulations**

**City of Salinas General Plan.** The General Plan Conservation/Open Space Element contains the following goals and policies associated with biological resources that are applicable to the proposed project:

**COSP Goal 5:** Protect and enhance the remaining identified and significant ecological and biological resources within and surrounding the community.

**Policy COSP 5.1:** Protect and enhance creek corridors, river corridors, the reclamation ditch, sloughs, wetlands, hillsides and other potentially significant biological resources for their value in providing visual amenity, flood protection, habitat for wildlife and recreational opportunities.
Policy COS-17: Setbacks and Open Space Easements to Protect Riparian and Wetland Corridors. Require project developers to protect and enhance riparian corridors through setbacks and open space easements within development areas along Gabilan and Natividad Creeks and other streams in the planning area. Protect and enhance wetlands by requiring setbacks and open space easements within future development areas in the planning area. A 100-foot setback area shall be established along Gabilan and Natividad Creeks and other unnamed creeks within the planning area. The setback shall be measured from the top of bank, or outside edge of riparian woodland, whichever is greater. A 100-foot setback area shall be established along wetlands not associated with creeks (i.e., seasonal wetland swales or ponds) within the planning area. The riparian setback shall be measured from the top of bank, or outside edge of riparian woodland, whichever is greater. The wetland setback shall be measured from the outside edge of the wetland. Development activities would be prohibited in the setback area; however, the City shall consider exceptions for passive recreational uses (i.e., trails, playfields, and picnic areas). No building or structure shall be developed in the setback area. The existing riparian woodland or wetland shall be protected from construction disturbance. Fencing shall be temporarily placed at the outside edge of the setback area. This fencing shall remain in-place until construction is complete. If recreational trails are placed within the buffer area, implement a revegetation program wherein a vegetative buffer is established between the trail and the outside edge of the riparian woodland.

For properties located in the City’s existing boundary as indicated on Figure LU-1 in the Land Use Element, development activities may be considered within the setback area if the City Planner determines the encroachment to be minor and a biotic resources study (prepared for the City Planner by his or her designee) has determined that the proposed encroachment will not significantly adversely impact the applicable creek or wetland because the implementation of alternative mitigation measures will achieve a comparable or better level of mitigation than the strict application of the 100-foot setback. The applicant shall be responsible for the costs of the study, mitigation, and annual monitoring.

Policy COS-18: Riparian/Wetland Habitat Mitigation and Management. Require project developers to retain creeks and wetlands in their natural channels rather than placing them in culverts or
underground pipes, where feasible. Where streambanks must be deepened, widened or straightened, they should be landscaped and revegetated afterward. Where wetlands are impacted, they should be re-created afterwards.

If impacts are incurred to creeks and/or riparian woodlands as part of development within the planning area, the project applicant shall develop and implement a riparian/wetland habitat mitigation and management plan. The plan shall include the replacement ratio for impacts to riparian resources, pursuant to current state and federal policies. The project applicant shall receive authorization to fill wetlands and “other” waters from the U.S. Army Corps of Engineers, pursuant the requirements of the Clean Water Act. The project applicant shall also obtain a water quality certification (or waiver) from the Regional Water Quality Control Board, consistent with requirements of this State agency. The project applicant shall also obtain a 1601/1603 Streambed Alteration Agreement from the California Department of Fish and [Wildlife], pursuant to Fish and Game Code. These permits shall be received prior to any site grading that may occur in or immediately adjacent to creeks or wetlands.

The project applicant shall also receive authorization from the National Marine Fisheries Service for “take” of steelhead and from the U.S. Fish and Wildlife Service for “take” of California red-legged frog, if work cannot avoid impacts to creek resources and/or these species.

Pursuant to provisions of the Section 404 permit, 1601/1603 Streambed Alteration Agreement and State water quality certification (or waiver), the project application shall implement a riparian/wetland mitigation plan, and any other measures so identified by regulatory agencies. This plan shall identify measures for the applicant to compensate for unavoidable impacts to riparian or wetland resources. A minimum 1:1 replacement ratio is typically recommended for impacted wetland resources to satisfy requirements of the U.S. Army Corps of Engineers and the Regional Water Quality Control Board (RWQCB). A minimum of 3:1 replacement ratio is typically recommended for impacted riparian resources to satisfy requirements of the CDF[W]. The applicant shall also identify and implement a 5-year maintenance and monitoring program.

**Policy COS-20:** Oak Tree Retention. Require project developers to retain coast live oak and valley oak trees within the planning area, including oaks within new development areas. All coast live oak and valley oak
trees should be surveyed prior to construction to determine if any raptor nests are present and active. If active nests are observed, the construction should be postponed until the end of fledging.

**Policy COS-21: Protection and Enhancement of Special Status Species.**

Require project developers to protect and enhance special status species habitat through setbacks and open space easements within new development and/or redevelopment areas. Protection and enhancement of special status species habitat shall require management of the habitat to ensure persistence of the species within the setback areas.

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

A qualified biologist shall conduct a biological assessment of all habitat areas to assess the potential for the following special status species: Congdon’s tarplant, Contra Costa goldfields, Pinnacles buckwheat, Alkali milk-vetch, Santa Cruz clover, Hutchinson’s larkspur, Kellogg’s horkelia, Burrowing owl, and/or California tiger salamander. If suitable habitat for any of these species is observed, then focused surveys during the appropriate season should be conducted. Such surveys would include winter and spring surveys for tiger salamander, protocol presence/absence surveys for burrowing owl, and spring/summer surveys for special status plant species. The California Department of Fish and [Wildlife] shall be consulted regarding the appropriate level of effort and protocol prior to conducting focused wildlife species surveys. If any of these species are found to inhabit the survey area, the City may require the preparation and implementation of a Habitat Management Plan to provide protection for the habitat. If impacts to occurrences are deemed unavoidable, the plan shall identify mitigation measures to compensate for impacts to the species. As part of the Habitat Management Plan, a 100-foot buffer shall be established around rare plant occurrences. The plan shall include measures to manage the rare plant occurrences for their protection and persistence at the site. The Habitat Management Plan shall be reviewed and approved by the California Department of Fish and [Wildlife] and/or USFWS prior to issuance of any permits by the City.
Prior to any proposed development within 150 feet of the stream corridors, protocol presence/absence surveys for California red-legged frog, southwestern pond turtle, and nesting birds should be conducted. If these species are observed, the CDFG and the USFWS should be consulted regarding appropriate measures to avoid and mitigate potential impacts of the project on these species. The City shall not issue any permits prior to obtaining written approval from the CDFG and/or USFWS that the proposed mitigation plan has been approved. Prior to any proposed development within or adjacent to oak woodland, a qualified biologist should conduct surveys to determine if protected wildlife species are nesting in the oak woodland, e.g., nesting raptors. If trees are to be removed, a qualified bat biologist should evaluate the trees as potential bat roost sites prior to removal, and recommend measures to avoid impacts to bats, such as exclusionary devices.

**Standards of Significance**

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of biological resources, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on the subject of air quality impacts, or indeed on any subject addressed in the checklist. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here, though it has exercised its discretion to modify the language of the Appendix G threshold addressing impacts to wetlands so that it applies not only to federally protected wetlands, but also to wetlands that are protected under state law (the reach of which is sometimes broader than federal law).

Although CEQA generally gives agencies considerable discretion in fashioning significance thresholds, there are some thresholds that must, as a matter of law, be used by public agencies. Many of these relate to biological resources, and are found in CEQA Guidelines section 15065 (“Mandatory Findings of Significance”).

Finally, the City is aware that neither Appendix G nor section 15065 sets forth language directly addressing potential effects on birds of prey or nesting birds due to violation of laws (described earlier) intended to protect them. The City has therefore exercised its discretion to formulate a threshold to address this particular category of impact.
In light of the foregoing, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- Substantially reduce the number or restrict the range of an endangered, rare, or threatened species;
- 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;
- 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 Wildlife or U.S. Fish and Wildlife Service;
- 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 Wildlife or U.S. Fish and Wildlife Service;
- Have a substantial adverse effect on federally or state-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 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;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- Result in the take or destruction of any nesting birds or birds of prey or the nest or eggs of such birds.

Among the inquiries set forth in Appendix G to the CEQA Guidelines is the question of whether a proposed project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. As described in the Environmental Setting, there are no habitat conservation plans or other conservation plans that apply to the project area; no further discussion of this topic is required. Similarly, because the proposed project would not substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; or threaten to eliminate a plant or animal community; no further discussion of these topics is required.
Analysis, Impacts, and Mitigation

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

**IMPACT: FUTURE DEVELOPMENT WITHIN ANY OF THE TARGET AREAS MAY IMPACT SPECIAL-STATUS CONGDON’S TARPLANT (LESS THAN SIGNIFICANT WITH MITIGATION)**

Due to this species’ affinity for disturbed areas and strips of ruderal vegetation, it could occur within any of the Target Areas. This species was identified in the vicinity of Target Area V (outside of the Target Area) during the reconnaissance field surveys. Removal of this plant species from within the Target Areas would be a significant impact. Implementation of the following mitigation measure would reduce this impact to a less-than-significant level.

**Mitigation Measure**

BIO-1. To protect Congdon’s tarplant, the presence/absence of Congdon’s tarplant in all annual grassland and ruderal habitats within any Target Area shall be determined during subsequent CEQA processes for individual projects. A qualified biologist shall conduct a focused botanical survey for this species in accordance with current California Department of Fish and Wildlife and California Native Plant Society rare plant survey protocols during its peak blooming period (typically August to September). If the survey concludes that the species is not present, then no further mitigation is required. If this species occurs within any of the Target Areas and would be impacted by development, then appropriate mitigation shall be developed and implemented.

Mitigation shall include, but not be limited to, project developers contracting with a qualified biologist or native plant specialist to collect seed from the annual Congdon’s tarplant individuals within the impact area prior to initiation of ground disturbance activities. Project developers and the City Community Development Department shall oversee selection of an appropriate mitigation area, preferably within the boundary of the individual project site, or in the vicinity, that would not be disturbed in the future. Collected seed shall be installed at the mitigation area at the optimal time. Topsoil from the occurrence location shall be salvaged (where practical) for use in the mitigation area. A qualified biologist shall develop a project-specific Habitat Management Plan which details methods for Congdon’s tarplant seed collection from the impact area, preparation of the
mitigation area, and seed installation at the mitigation area. In accordance with the General Plan, the Habitat Management Plan shall include basic maintenance measures and defined performance standards to manage the rare plant occurrence for its long-term protection and persistence at the mitigation area.

Individual developers of projects within the Target Areas will be responsible for implementation of this mitigation measure with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City as part of the CEQA process for individual projects.

Implementation of mitigation measure BIO-1 will ensure that potential impacts to special-status Congdon’s tarplant are mitigated to a less-than-significant level by requiring a determination of whether the species is present and if so, requiring implementation of measures and defined performance standards to collect seed and replant in a mitigation site. With implementation of this mitigation measure, the proposed project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, this impact is less than significant with mitigation incorporated.

**IMPACT: FUTURE DEVELOPMENT WITHIN TARGET AREAS F, K, V MAY IMPACT FEDERALLY AND/OR STATE-LISTED CALIFORNIA TIGER SALAMANDER AND CALIFORNIA RED-LEGGED FROG (LESS THAN SIGNIFICANT WITH MITIGATION)**

Disturbance to drainages within Target Area V, agricultural habitat within Target Areas F, K, or V may result in the harassment, habitat removal, or direct mortality of CTS, a federally and state-listed Threatened species; and CRLF, a federally listed Threatened and California Species of Special Concern. If a wandering or aestivating CRLF or CTS were killed, injured, or harassed this would also constitute a ‘take’ under the ESA and/or CESA, and incidental take permits from the USFWS and CDFW would be required to proceed with work. An unauthorized “take” represents a potentially significant impact. Implementation of the following mitigation measure would reduce this impact to a less-than-significant level.

**Mitigation Measure**

BIO-2. To avoid possible impacts to California red-legged frog and California tiger salamander, the drainages within Target Area V and the agricultural areas within Target Areas F, K, or V shall be evaluated during the subsequent CEQA process to determine if suitable aquatic breeding and/or upland aestivation habitat is present.
If no aquatic breeding or upland aestivation habitat is present, but development within the Target Areas or proposed within areas that could be traversed by wandering frogs or salamanders, initial site clearing and grading shall be conducted and completed only during the dry season, which typically extends from April 15 to November 15. Site clearing and grading shall halt if significant rainfall, defined as greater than 0.5-inch per 24 hours within a local watershed, is either forecasted or observed to avoid environmental conditions when California red-legged frog or California tiger salamander would have the potential to be active.

A biologist qualified to assess and monitor California red-legged frog and/or California tiger salamander shall be approved by the City prior to the start of construction activities. The biologist shall conduct preconstruction surveys, training sessions, and construction monitoring and reporting, if needed.

Before construction activities begin, the qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of California red-legged frog and California tiger salamander and their habitats, the measures that are being implemented to conserve California red-legged frog and California tiger salamander as they relate to the project (contained herein), and the boundaries within which the project occurs. Informational handouts with photographs clearly illustrating the species' appearances shall be used in the training session. All new construction personnel shall undergo this mandatory environmental awareness training.

The contractor shall avoid the use of monofilament netting including in temporary and permanent erosion control materials (fiber rolls and blankets).

If proposed construction activities may result in the “take” (harass, harm, pursue, wound, kill, trap, or capture) of California red-legged frog or California tiger salamander, the project proponent shall obtain state and federal Incidental Take Permits, and comply with all stipulated conditions to protect special-status amphibians (including, but not limited to those identified above) and compensate for the permanent loss of California tiger salamander and/or California red-legged frog breeding or upland habitat. To compensate for the permanent loss of habitat, the applicant would be required to preserve or purchase in-kind habitat that is known to provide breeding and/or upland habitat for California tiger salamander and/or California red-legged frog. Compensatory mitigation may be accomplished through one of the following options:

- Establishing a conservation easement on site or off site in a suitable Monterey County location and providing a non-wasting endowment for management and monitoring of the property in perpetuity. Lands placed in a conservation easement must be documented to support California tiger salamander and/or California red-legged frog;
3.0 Environmental Setting, Impacts and Mitigation Measures

- Depositing funds into an USFWS and CDFW approved in-lieu fee program; or
- Purchasing credits in a USFWS and CDFW approved conservation bank that includes the project site in its service area.

The applicants for projects within the subject Target Areas will be responsible for implementing this mitigation measure, with oversight by the Community Development Director. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance.

Implementation of mitigation measure BIO-2 will ensure that potential impacts to federally and/or state-listed amphibian species are reduced by determining whether they are likely to occur within areas proposed for construction, by requiring exclusionary fencing, environmental awareness training, and biological construction monitoring if impacts can be avoided, or obtaining regulatory permits from the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife via the incidental take permitting process, if impacts cannot be avoided. With implementation of this mitigation measure, the proposed project would not substantially reduce the number or restrict the range of an endangered, rare or threatened species. Therefore, this impact is less than significant with mitigation incorporated.

**Impact: Future Development within any of the Target Areas May Impact Nesting Birds (Less Than Significant with Mitigation)**

Implementation of a project within any of the Target Areas or may result in impacts to nesting birds, which is considered a significant adverse environmental impact. Protected nesting birds - including the California Species of Special Concern northern harrier and yellow-breasted chat; the federal and California Species of Special Concern yellow warbler and tricolored blackbird; and the California Fully Protected white-tailed kite - have the potential to nest in any of the Target Areas. Construction noise has the potential to impact nesting birds (including raptors) protected under the federal Migratory Bird Treaty Act and California Fish and Game Code if construction activities occur during the nesting bird season (February 1 through September 15). If protected species are nesting in or adjacent to a proposed development site during the nesting season, then construction activities could result in the loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Implementation of the following mitigation measure would reduce potentially significant impacts to nesting birds to a less-than-significant level.

**Mitigation Measure**

BIO-3. To avoid possible impacts to nesting birds occurring within any of the Target Areas, construction activities should be scheduled to take place outside of the bird nesting season (September 16 through January 31). If construction occurs during the bird nesting season (February 1 through September 15), then a qualified biologist shall conduct a pre-
construction survey for nesting birds to ensure that no nests would be disturbed during project construction. This survey shall be conducted no more than seven days prior to the initiation of disturbance activities.

If no active nests are present within 250 feet of the locations of planned construction activities, then activities can proceed as scheduled. However, if an active nest is detected during the survey within 250 feet of such activities, a protective construction-free buffer zone from each active nest (typically 250 feet for raptors and 50-100 feet for other species, to be determined by the qualified biologist) will be clearly delineated or fenced until the juvenile bird(s) have fledged (left the nest), unless the biologist determines that construction would not impact active nests.

The applicants for projects within the Target Areas will be responsible for implementation of this mitigation measure, with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance.

Implementation of mitigation measure BIO-3 will ensure that potential impacts to nesting birds are reduced by requiring pre-construction surveys and requiring avoidance measures to ensure development activities will not take or destroy any nesting bird or bird of prey or disrupt the nesting activities of such birds. With implementation of this mitigation measure, the proposed project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, this impact is less than significant with mitigation incorporated.

**IMPACT: FUTURE DEVELOPMENT WITHIN ANY OF THE TARGET AREAS MAY IMPACT SPECIAL-STATUS WESTERN BURROWING OWL (LESS THAN SIGNIFICANT WITH MITIGATION)**

Construction of development projects within any of the Target Areas could result in significant impacts to western burrowing owls. Ground disturbance and development could result in the destruction of burrows occupied by burrowing owls. Implementation of the following mitigation measure would reduce this potentially significant impact to a less-than-significant level.

**Mitigation Measure**

BIO-4. To avoid/minimize potential impacts to burrowing owls occurring within any of the Target Areas individual project developers will retain a qualified biologist to conduct a two-visit (i.e. morning and evening) presence/absence survey at areas of suitable...
habitat on and adjacent to the project site no less than 14 days prior to the start of construction. Surveys shall be conducted according to methods described in the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). If these pre-construction “take avoidance” surveys performed during the breeding season (February through August) or the non-breeding season (September through January) locate occupied burrows in or near construction areas, consultation with the California Department of Fish and Wildlife would be required to interpret survey results and develop a project-specific plan for avoidance, minimization, and compensation.

Where there is insufficient habitat on, adjacent to, or near project sites where burrowing owls will be impacted, acquisition of off-site mitigation lands with occupied burrowing owl habitat may be required in consultation with California Department of Fish and Wildlife. Compensation may take the form of (a) acquiring and dedicating lands into conservation easements; (b) purchasing mitigation credits at compensation ratios that have been approved by the California Department of Fish and Wildlife; or (c) preserving area contiguous or near the acreage lost.

The applicants for projects within the Target Areas will be responsible for implementation of this mitigation measure, with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance.

Implementation of mitigation measure BIO-4 will ensure that potential impacts to special-status burrowing owls are reduced by requiring avoidance measures and/or pre-construction surveys to ensure development activities will not disrupt nesting activities. With implementation of this mitigation measure, the proposed project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, this impact is less than significant with mitigation incorporated.

**IMPACT: FUTURE DEVELOPMENT WITHIN TARGET AREA V MAY IMPACT SPECIAL-STATUS MONTEREY DUSKY-FOOTED WOODRAT (LESS THAN SIGNIFICANT WITH MITIGATION)**

Construction of projects within Target Area V could result in impacts to Monterey dusky-footed woodrat, which could be significant. Woodrat nests were observed in the riparian area of Natividad Creek and this species has the potential to occur in vegetation associated with waterways or canals. If present within Target Area V, significant impacts to this species could occur during construction clearing and grading activities. Implementation of the following mitigation measure would reduce this impact to a less-than-significant level.
Mitigation Measure

BIO-5. A qualified biologist shall conduct pre-construction surveys for woodrat nests within Target Area V, including a 30-foot buffer around project impact areas. All woodrat nests shall be flagged for avoidance of direct construction impacts and a 10-foot equipment exclusion buffer shall be established around dens that shall not be removed and are in proximity to the construction area.

If avoidance of active woodrat nests is not feasible, woodrat nests shall be dismantled by the qualified biologist no more than three days prior to construction. Woodrats shall be evicted from their nests prior to the removal of the nests and onset of any clearing or ground disturbing activities to avoid direct injury or mortality of the woodrats.

The nests shall be dismantled and the nesting material and/or food caches moved to a new location outside of the project impact area. Prior to nest deconstruction, each active nest shall be disturbed by the qualified biologist such that all woodrats leave the nest and seek refuge out of the project impact area. Nests are to be slowly dismantled by hand in order to allow the occupants to disperse. Should young prior to the age of weaning be found in the nest, the nest shall be reconstructed in place and left undisturbed for three weeks or a period of time deemed adequate by the qualified biologist for the young to wean.

All vegetation and duff materials shall be removed from three feet around the nest prior to dismantling so that the occupants do not attempt to rebuild within the project impact area. Nesting materials shall be placed nearby in a location similar to the original location (e.g. the base of a nearby hardwood tree or shrub, near a downed log, or in the open), if such a location is readily available. The spacing between active relocated nests shall not be less than 100 feet, unless the qualified biologist has determined that the habitat can support higher densities of nests, or if the original nests were closer than 100 feet to one another.

The applicants for projects within Target Area V will be responsible for implementation of this mitigation measure, with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance.

With implementation of mitigation measure BIO-5, the proposed project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, potential direct impacts to special-status Monterey dusky-footed woodrat are less than significant with mitigation incorporated.
IMPACT: FUTURE DEVELOPMENT WITHIN ANY OF THE TARGET AREAS MAY IMPACT SPECIAL-STATUS BATS (LESS THAN SIGNIFICANT WITH MITIGATION)

Construction of projects proposed within any of the Target Areas could result in significant impacts to special-status bats, including hoary bat, pallid bat, Townsend’s big-eared bat, and Yuma myotis. Development could result in the destruction of roost and natal sites occupied by special-status bats. Vegetation clearing and building demolition could destroy occupied habitat if present. Implementation of the following mitigation measure would reduce this potentially significant impact to a less-than-significant level.

Mitigation Measure

BIO-6. Prior to tree removal or structure disturbance activities, individual project developers shall retain a qualified biologist to conduct a focused survey for bats and potential roosting sites in trees to be removed, in trees within 250 feet of the development footprint, and within and surrounding any structures that may be disturbed by the project. These surveys shall be conducted no more than 15 days prior to the start of construction. The surveys can be conducted by visual identification and assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an “Anabat” unit.

If no roosting sites or bats are found, a letter report confirming absence shall be submitted to the City of Salinas and no further mitigation is required.

If bats or roosting sites are found, a letter report and supplemental documents shall be provided to the City of Salinas prior to grading permit issuance and the following monitoring, exclusion, and habitat replacement measures shall be implemented:

a. If bats are found roosting outside of the nursery season (May 1 through October 1), they shall be evicted as described under (b) below. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined to not be a maternal roost, then the bats shall be evicted as described under (b) below. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 250-foot buffer zone (or different size if determined in consultation with the CDFW) shall be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.
b. If a non-breeding bat hibernaculum is found in a tree or snag scheduled for removal or on any structures scheduled to be disturbed by project activities, the individuals will be safely evicted, under the direction of a qualified bat biologist and in consultation with the CDFW. Methods could include: carefully opening the roosting area in a tree or snag by hand to expose the cavity and opening doors/windows on structures, or creating openings in walls to allow light into the structures. Removal of any trees or snags and disturbance of any structures shall be conducted no earlier than the following day (i.e., at least one night will be provided between initial roost eviction disturbance and tree removal/structure disturbance). This action will allow bats to leave during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.

The applicants for projects within the Target Areas will be responsible for implementing this mitigation measure with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance or the removal of trees or buildings.

With implementation of mitigation measure BIO-6, the proposed project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, potential impacts to special-status bat species are less than significant with mitigation incorporated.

**IMPACT: FUTURE DEVELOPMENT WITHIN TARGET AREA V MAY IMPACT JURISDICTIONAL WETLANDS AND WATERS (LESS THAN SIGNIFICANT WITH MITIGATION)**

Based on the results of the reconnaissance-level surveys and review of maps from the USFWS National Wetlands Inventory, Target Area V potentially contains jurisdictional wetlands and/or waters of the U.S. or State. Filling wetlands and waterways is a significant environmental impact. Implementation of the following mitigation measure would ensure that potential impacts to jurisdictional wetlands or waterways would be reduced to a less-than-significant level.

**Mitigation Measure**

BIO-7. Prior to commencement of construction activities for individual projects within Target Area V, a preliminary jurisdictional wetland assessment will be conducted by a qualified biologist to document the extent of features potentially regulated by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and/or the Regional Water Quality Control Board.
If impacts to a federal jurisdictional feature may occur, a Clean Water Act Section 404 Nationwide Permit may be needed. If the proposed activity would not otherwise qualify for a Nationwide Permit, the applicant will proceed with obtaining an Individual Permit from the USACE. For either permit, a wetland delineation report shall first be submitted to the USACE for a jurisdictional determination.

If impacts to a wetland not subject to federal jurisdiction but subject to state jurisdiction may occur, fill authorization shall be sought from the Central Coast Regional Water Quality Control Board.

For any wetland impacted by individual projects within Target Area V, the project proponent shall take steps necessary to comply with City General Plan Policy COS-18, including the minimum ratios set forth therein for impacts to wetlands and other waters. Mitigation shall be sufficient to ensure no net loss of wetland area, function, or value, either through wetland creation, restoration, or the purchase of wetland credits through an approved wetland mitigation bank.

A Water Quality Certification (Section 401 of the Clean Water Act) from the Central Coast Regional Water Quality Control Board and Lake or Streambed Alteration Agreement from the California Department of Fish and Wildlife will also be obtained if determined necessary through the wetland assessment and subsequent regulatory agency consultation.

Applicants for projects within Target Area V will be responsible for implementing this mitigation measure with oversight by the City Community Development Department as needed. Compliance with this measure shall be documented and submitted to the City prior to ground disturbance.

Implementation of mitigation measure BIO-7 will ensure that impacts to potentially jurisdictional wetlands and waterways are mitigated by requiring a wetland assessment/jurisdictional determination and associated permitting. With implementation of this mitigation measure, the proposed project would not have a substantial adverse effect on federally or state-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, this impact is less than significant with mitigation incorporated.

**IMPACT: FUTURE DEVELOPMENT WITHIN TARGET AREA V MAY IMPACT RIPARIAN HABITATS/SENSITIVE NATURAL COMMUNITIES (LESS THAN SIGNIFICANT WITH MITIGATION)**

General Plan measure COS-16 requires project developers to protect and enhance riparian corridors through setbacks and open space easements within development areas along Gabilan
and Natividad Creeks and other streams. A 100-foot setback area must be established along Gabilan and Natividad creeks, other unnamed creeks, and wetlands not associated with creeks (i.e., seasonal wetland swales or ponds). No building or structure is to be developed in the setback area; however, the City will consider exceptions for passive recreational uses (i.e., trails, playfields, and picnic areas).

Based on the results of the reconnaissance-level survey and aerial imagery review, Target Area V contains riparian and/or freshwater marsh vegetation. Both plant communities are considered sensitive by the CDFW. With implementation of mitigation measure BIO-7 above, the proposed project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, this impact is less than significant with mitigation incorporated.

### 3.5 Climate Change

Construction and operation of future development projects within the Target Areas will generate greenhouse gas emissions (GHG). The primary sources of GHGs will be from combustion of fuel in vehicles and use of electricity generated by fossil fuels. These emissions will contribute to global warming. This section of the EIR includes discussion of the science of climate change, existing setting conditions, existing applicable policy and regulatory direction regarding climate change, the sources and projected volume of GHG emissions that would be generated by the proposed project, GHG emissions volume reductions that accrue to state legislation and regulations, potential GHG emissions impacts in light of applicable thresholds of significance, and GHG reduction measures to lessen project impacts on climate change.

Information is this section is derived from a variety of sources including:

- *Economic Development Element Draft Transportation Impact Analysis* (Fehr & Peers 2017) (“TIA”) included as Appendix I on the CD on the inside back cover of this EIR and discussed in detail in Section 3.12, Transportation;
- CalEEMod modeling conducted by EMC Planning Group, included in Appendix E; and
- *2035 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties* (Association of Monterey Bay Area Governments 2014).

Climate change related comments were received from Building Healthy Communities as part of the NOP process. The primary comment recommends evaluating an alternative that eliminates the conceptual expressways as a means to reduce potential GHG impacts. The additional roadways have since been removed from the project description.
Global, National, State, and Local Environmental Setting

Climate Change Science

The international scientific community has concluded with a high degree of confidence that human activities are causing an accelerated warming of the atmosphere. The resulting change in climate has serious global implications; and, consequently, human activities that contribute to climate change may have a potentially significant effect on the environment. In recent years, concern about climate change and its potential impacts has risen dramatically. That concern has translated into a range of international treaties and national and regional agreements aimed at diminishing the rate at which global warming is occurring. The federal government under President Obama began to tackle concerns about climate change through a range of initiatives and regulatory actions. Many states and local agencies, private sector interests, and other public and private interests have also taken initiative to combat climate change. At the state level, California has taken a leadership role in tackling climate change, as evidenced by the programs outlined in the Regulatory Setting section below.

Causes of Climate Change and Projected Local/State Effects

The greenhouse effect naturally regulates the Earth’s temperature. However, human activity has increased the intensity of the greenhouse effect by releasing increasing amounts of greenhouse gasses GHGs into the atmosphere. GHGs can remain in the atmosphere for decades or even for hundreds or thousands of years (depending on the particular GHG). The GHG emissions that are already in the atmosphere will continue to cause climate change for years to come, just as the warming being experienced now is the result of emissions produced in the past. Climatic changes are happening now and are projected to increase in frequency and severity before the benefits of GHG emission reductions will be realized. Increased concentrations of GHGs in the atmosphere result in increased air, surface, and ocean temperatures. Many of the effects and impacts of climate change stem from resulting changes in temperature and meteorological responses to those changes.

Rising Temperatures. The Intergovernmental Panel on Climate Change (IPCC), which includes more than 1,300 scientists from the United States and other countries, estimated that over the last century, global temperatures have increased by about 1.3 degrees Fahrenheit (°F). The IPCC forecasts indicate that global temperatures can be expected to continue to rise between 2.5 and 10°F over the next century. According to the California Climate Adaptation Strategy, average state temperatures are currently predicted to increase 1.8 to 5.4°F by 2050 and 3.6 to 9°F by 2100. Some regional models show average temperatures in California increasing as much as 10.8°F.
Salinas has already experienced a rise in average temperatures. Winters are now shorter and warmer than they were 30 years ago. Temperatures in California have already risen 1°F on average. According to Cal-Adapt, a climate change projection modeling tool developed by California Energy Commission, temperatures in Salinas have historically averaged about 56.9°F. Temperatures are projected to rise between 3.4 and 5.6°F by 2090, based on average low and high emissions scenarios.

While temperatures are relatively low in Salinas compared to other areas in the state, Salinas will still experience temperature changes related to climate change. Salinas has historically experienced four extreme heat days per year (over 91°F). In 2016, this number is projected to increase to six extreme heat days, but projections fluctuate on an annual basis. In 2017, 17 extreme heat days are projected. This number is projected at 75 extreme heat days per year by 2099. While in 2015 and nearly all previous years, the City had not experienced heat waves, up to six heat waves are projected for the year 2099 (http://cal-adapt.org/tools/).

**Precipitation Levels.** Precipitation levels are difficult to predict compared to other indicators of climate change. Annual rain and snowfall patterns vary widely from year to year, especially in California. Generally, higher temperatures increase evaporation and decrease snowfall, resulting in a drier climate. On average, projections show little change in total annual precipitation in California. Furthermore, among several models, precipitation projections do not show a consistent trend during the next century. The Mediterranean seasonal precipitation pattern is expected to continue, with most precipitation falling during winter from North Pacific storms. One of the four climate models projects slightly wetter winters, and another projects slightly drier winters with a 10 to 20 percent decrease in total annual precipitation. However, even modest changes would have a significant impact because California ecosystems are conditioned to historical precipitation levels and water resources are nearly fully utilized.

**Reduced Snowpack.** The Sierra Nevada snowpack acts as a large natural reservoir that stores water during the winter and releases it into rivers and reservoirs in the spring and summer. It is expected that there will be less snowfall in the Sierra Nevada and that the elevations at which snow falls will rise. Similarly, there will be less snowpack water storage to supply runoff water in the warmer months. It has already been documented that California’s snow line is rising. More precipitation is expected to fall as rain instead of snow, and the snow that does fall will melt earlier, reducing the Sierra Nevada spring snowpack. The spring snowpack in the Sierra Nevada decreased by 10 percent in the last century and may decrease up to 80 percent by 2100. It is estimated that for each 1.8°F increase in Earth’s average temperature, the Sierra snowpack will retreat 500 feet in elevation and an overall reduction of 25 to 40 percent reduction in snowpack by 2050 is projected. The Sierra Nevada snowpack provides approximately 80 percent of California's annual water supply. Although groundwater is the city’s water source, the rapid
decrease in snowpack and spring melt poses a threat to groundwater resources in many parts of the state where rivers that recharge groundwater with melt water from the Sierra Nevada will have reduced groundwater recharge potential.

**Water Supply.** Climate change is expected to increase pressure on and competition for water resources, further exacerbating already stretched water supplies. Decreasing snowpack and spring stream flows and increasing demand for water from a growing population and hotter climate could lead to increasing water shortages. Water supplies are also at risk from rising sea levels. Competition for water between cities, farmers, and the environment is expected to increase.

Anticipated changes to source water conditions, including more intense storm events, longer drought periods, reduced snowpack at lower elevations, and earlier spring runoff, will likely impact the quality of the source waters. Changes in source water quantity and quality may impact the treatment necessary to produce potable drinking water. These changes could result in additional treatment processes required and increased costs for treated drinking water in order to avoid potential for human health risk via drinking water consumption.

**More Frequent and Extreme Storm Events.** Extreme weather is expected to become more common throughout California. More extreme storm events are expected to increase water runoff to streams and rivers during the winter months, heightening flood risks. Warmer ocean surface temperatures have caused warmer and wetter conditions in the Sierra Nevada, increasing flood risk. Strong winter storms may produce atmospheric rivers that transport large amounts of water vapor from the Pacific Ocean to the California coast. They often last for days and drop heavy rain or snow for days. Storms involving such atmospheric rivers occurred during the winter of 2016-2017. As the strength of these storms increase and transport increased amounts of precipitation, the risk of flooding is increased.

**Diminished Air Quality.** Climate change is expected to exacerbate air quality problems by increasing the frequency, duration, and intensity of conditions conducive to air pollution formation. Higher temperatures and increased ultraviolet radiation from climate change are expected to facilitate the chemical formation of more secondary air pollutants from ground-level sources. Conversely, decreased precipitation is expected to reduce the amount of particulates cleansed from the air.

Californians experience the worst quality air in the nation. More than 90 percent of California’s population lives in areas that have ozone or particulate matter levels above the State air quality standard. Incidents of wildfires in nearby foothills and mountain regions are expected to increase and further contribute to air quality problems.
Environmental Protection. Climate change effects will have broad impacts on local and regional ecosystems, habitats, and wildlife as average temperatures increase, precipitation patterns change, and more extreme weather events occur. Species have adapted to natural and more gradual environmental changes for millions of years. Species that cannot adapt rapidly are at risk of extinction. Some species could increase their habitat range. The risk of extinction could increase for many species. As temperatures increase, California vegetation is expected to change. Desert and grassland vegetation is projected to increase, while forest vegetation is projected to generally decline. The natural cycle of plant flowering and pollination, as well as the temperature conditions necessary for a thriving locally adapted agriculture, may also be affected. Perennial crops, such as grapes, may take years to recover. Increased temperatures also provide a foothold for invasive species of weeds, insects, and animals.

Social Vulnerability to Climate Change. The impacts of climate change will not affect people equally. Some people are more likely to be impacted than others. People exposed to the most severe climate-related hazards are often those least able to cope with the associated impacts, due to their limited adaptive capacity. Climate change is expected to have a greater impact on larger populations living in poorer and developing countries with lower incomes that rely on natural resources and agricultural systems that will likely be affected by changing climates.

Certain groups in developed countries like the United States will also experience more impacts from climate change than others. People in rural areas are more likely to be affected by climate change impacts, such as droughts or severe storms, compared to their urban counterparts. However, certain groups living in cities will also be at higher risk than others. Salinas residents who are at greatest risk for the impacts described earlier in this section include children, the elderly, those with existing health problems (i.e., obese youth), the socially and/or economically disadvantaged (i.e., people of color, foreign born population, households speaking little English, low income households, unemployed, population without a high school diploma), those who are less mobile (i.e., living in group quarters, households without a vehicle), and those who work outdoors. Place of residence is another vulnerability indicator, as renters, households without air conditioning, households lacking access to grocery stores, households in treeless areas, and households on impervious land cover are also more vulnerable to climate change impacts.

Health Effects/Illness. As temperatures rise from global warming, the frequency and severity of heat waves will grow and increase the potential for bad air days, which can lead to increases in illness and death due to dehydration, heart attack, stroke, and respiratory disease. Additionally, dry conditions can lead to a greater number of wildfires producing smoke that puts people with asthma and respiratory conditions at risk of illness or death.

Higher temperatures and the increased frequency of heat waves are expected to significantly increase heat-related illnesses, such as heat exhaustion and heat stroke, while also exacerbating
conditions associated with cardiovascular and respiratory diseases, diabetes, nervous system disorders, emphysema, and epilepsy. An increase of 10°F in average daily temperature is associated with a 2.3 percent increase in mortality. During heat waves, mortality rates can increase to about nine percent. As temperatures in Salinas increase, vulnerable populations such as children, the elderly, people with existing illnesses, and people who work outdoors will face the greatest risk of heat-related illness.

As climate change affects the temperature, humidity, and rainfall levels across California, some areas could become more suitable habitats for insects (especially mosquitoes), ticks, and mites that may carry diseases. Wetter regions are typically more susceptible to vector-borne diseases, especially human hantavirus cardiopulmonary syndrome, Lyme disease, and West Nile virus. Salinas is projected to have warmer winters with up to approximately 20 inches of rain under a low emissions scenario. This may attract vector populations (e.g., mosquito inhabited still-water pools may become more prolific). Floods can also increase the food supply available to rodents that may transmit Lyme disease, plague, tularemia, and rickettsial infections. In each of these cases the increase in vector-borne disease occurrences is expected to impact public health and increase demand on health care systems.

**Flood Risk.** Increased flood frequency and elevated flood risk are expected in California as a result of sea level rise, more intense storm events, and shifts in the seasonal timing of rainfall and snowpack runoff. Portions of Salinas are subject to flood hazards due to seasonal run-off along local creeks and flood flows in Carr Lake and the Reclamation Ditch. Flooding within Salinas could be exacerbated.

**Greenhouse Gas Types**

GHGs are emitted by natural processes and human activities. The human-produced GHGs most responsible for global warming and their relative contribution to it are carbon dioxide, methane, nitrous oxide and chlorofluorocarbons. The contribution of these GHGs to the U.S. inventory of GHGs in 2013 is summarized in Table 20, GHG Types and Their Contribution to Global Warming.

**Greenhouse Gas Global Warming Potentials**

Each type of GHG has a different capacity to trap heat in the atmosphere and each type remains in the atmosphere for a particular length of time. The ability of a GHG to trap heat is measured by an index called the global warming potential (GWP) expressed as carbon dioxide equivalent. Carbon dioxide is considered the baseline GHG in this index and has a global warming potential of one. The GHG volume produced by a particular source is often expressed in terms of carbon dioxide equivalent (CO2e). Carbon dioxide equivalent describes how much global warming a
given type of GHG will cause, with the GWP of CO₂ as the base reference. It is useful because it allows comparisons of the impact from many different GHGs, such as methane, perfluorocarbons or nitrous oxide. If a project is a source of several types of GHGs, their individual GWP can be standardized and expressed in terms of CO₂e.

Table 20  GHG Types and Their Contribution to Global Warming

<table>
<thead>
<tr>
<th>Greenhouse Gas</th>
<th>Percent of all GHG</th>
<th>Typical Sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon dioxide (CO₂)</td>
<td>82 percent</td>
<td>Combustion of fuels, solid waste, wood</td>
</tr>
<tr>
<td>Methane (CH₄)</td>
<td>10 percent</td>
<td>Fuel production/combustion; livestock, decay of organic materials</td>
</tr>
<tr>
<td>Nitrous Oxide (N₂O)</td>
<td>5 percent</td>
<td>Combustion of fuels, solid waste; agricultural and industrial processes</td>
</tr>
<tr>
<td>Chlorofluorocarbons (CFCs)</td>
<td>3 percent</td>
<td>Industrial processes</td>
</tr>
</tbody>
</table>


Note: Percentages reflect weighting for global warming potential.

Methane has a global warming potential of 21 times that of carbon dioxide, and nitrous oxide has a global warming potential of 310 times that of CO₂. The families of chlorofluorocarbons, hydrofluorocarbons and perfluorocarbons have a substantially greater global warming potential than other GHGs, generally ranging from approximately 1,300 to over 10,000 times that of CO₂. See Table 21, GHG Global Warming Potentials, for reference on the GWP of various GHGs. While CO₂ represents the vast majority of the total volume of GHGs released into the atmosphere, the release of even small quantities of other types of GHGs can be significant for their contribution to climate change.

Inventories of Greenhouse Gases

California GHG Emissions Inventory. California is a substantial contributor of global greenhouse gases. Based on CARB’s most recent state GHG inventory, a net of about 459.28 million tons of CO₂e were generated in 2013 (California Air Resources Board 2015). In 2013, about 37 percent of all GHG gases emitted in the state came from the transportation sector. Industrial uses and electric power generation (in state generation and out of state generation for imported electricity) were the second and third largest categories at about 23 percent and 20 percent, respectively. The commercial and residential use sectors combined to generate about 12 percent of the 2013 emissions, while the agricultural sector contributed about eight percent.
Table 21  GHG Global Warming Potentials

<table>
<thead>
<tr>
<th>GHG</th>
<th>Atmospheric Lifetime (Years)</th>
<th>Global Warming Potential (100-Year Time Horizon)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Dioxide CO₂</td>
<td>50-200</td>
<td>1</td>
</tr>
<tr>
<td>Methane CH₄</td>
<td>12 (+/- 3)</td>
<td>21</td>
</tr>
<tr>
<td>Nitrous Oxide N₂O</td>
<td>120</td>
<td>310</td>
</tr>
<tr>
<td>HFC-23</td>
<td>264</td>
<td>11,700</td>
</tr>
<tr>
<td>HFC-134a</td>
<td>14.6</td>
<td>1,300</td>
</tr>
<tr>
<td>HFC-152a</td>
<td>1.5</td>
<td>140</td>
</tr>
<tr>
<td>PFC Tetrafluoromethane CF₄</td>
<td>50,000</td>
<td>6,500</td>
</tr>
<tr>
<td>PFC Hexafluoroethane C₂F₆</td>
<td>10,000</td>
<td>9,200</td>
</tr>
<tr>
<td>Sulfur Hexafluoride SF₆</td>
<td>3,200</td>
<td>23,900</td>
</tr>
</tbody>
</table>


City of Salinas GHG Emissions Inventory. In association with Local Governments for Sustainability, the Association of Monterey Bay Area Governments (AMBAG) has assisted a number of local communities in the preparation of GHG emissions baseline inventories. The City of Salinas participated in this effort. In 2011 AMBAG produced the City of Salinas Greenhouse Gas Emissions Inventory 2005 Baseline Report. The baseline report provides data on the City’s 2005 emissions baseline volumes generated by community activities (i.e. land use development) and by government operations. Total 2005 GHG emissions were estimated at approximately 804,444 metric tons CO₂e. Emissions from commercial and industrial development were estimated at 271,143 metric tons CO₂e. The commercial and industrial emissions include only those related to the consumption of electricity and natural gas and do not include emissions from associated transportation or waste disposal/management.

Projections of emissions volumes in 2020 are also made, including emissions from new commercial and industrial development within Salinas as forecast in the General Plan. Total emissions are estimated at approximately 900,103 metric tons CO₂e, an increase of 12 percent over 2005 baseline volumes. Emissions from commercial and industrial development are projected at 299,223 metric tons CO₂e, a 10 percent increase over 2005 baseline volumes.

Regulatory Setting

State and regional policies and regulations pertaining to climate change are summarized below. These provide context for how climate change is being addressed and identify policy and
regulatory actions whose implementation would lessen the contribution of the proposed project to climate change. The federal government has also taken significant regulatory steps toward addressing climate change. Generally, California policy and regulations are more comprehensive than federal actions; therefore, this regulatory section focuses on state activity. A number of policies and programs in the General Plan direct development in a manner that indirectly reduces GHGs.

State

State policy and regulatory guidance has grown out of its effort to meet goals under Executive Order S-03-05 and the landmark 2006 Global Warming Solutions Act (AB 32), which was passed in 2006. Numerous additional legislative acts and executive orders provide further GHG emissions reduction guidance and have reinforced that CEQA is the appropriate evaluation tool for assessing climate change impacts of new development.

Executive Order S-03-05. The Governor signed this executive order on June 1, 2005. It recognizes the anticipated effects of climate change, such as increased temperatures, reduced Sierra Nevada snowpack, worsened air quality, and sea level rise among others. The executive order includes GHG emission reduction targets for the purpose of combating these effects. GHG emissions are to be reduced to 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050.

The extent to which an EIR for a Regional Transportation Plan (and perhaps other CEQA documents for other projects) must address the proposed project’s consistency with this Executive Order is an issue that was decided in July 2017 by the California Supreme Court in Cleveland National Forest Foundation v. San Diego Association of Governments. In short, the Court held that the San Diego Association of Governments decision not to include the 2050 GHG emissions target in Executive Order S-03-05 as a threshold of significance in its regional transportation plan EIR was not required given the type of project being evaluated, the disclosure of GHG effects of the project in 2050 provided in the EIR, and the information available. However, the Court also cautioned that its decision applies narrowly to the specific analysis in the regional transportation plan EIR at the time it was prepared and that its ruling does not mean that the regional transportation EIR's analysis can serve as a template for EIRs for other lead agencies. (See Cleveland National Forest Foundation v. San Diego Association of Governments, S223603.)

California Assembly Bill 32 (Global Warming Solutions Act). In September 2006, the Governor signed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires that
statewide GHG emissions be reduced to 1990 levels by 2020 consistent with Executive Order S-03-05. This reduction will be accomplished through an enforceable statewide cap on GHG emissions that was phased in starting in 2012. To effectively implement the cap, AB 32 directs the California Air Resources Board (CARB) to develop and implement regulations to reduce statewide GHG emissions from stationary sources.

**AB 32 Scoping Plan.** In December 2008, CARB adopted the Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 118 million metric tons (MMT) CO$_2$e, or approximately 22 percent from the state's projected 2020 emission level of 545 MMT of CO$_2$e under a business-as-usual scenario. This is a reduction of 47 MMT CO$_2$e, or almost 10 percent, from 2008 emissions. CARB's original 2020 projection was 596 MMT CO$_2$e, but this revised 2020 projection takes into account the economic downturn that occurred in 2008. The scoping plan also includes CARB recommended GHG reductions for each emissions sector of the state GHG inventory. CARB estimates the largest reductions in GHG emissions would be by implementing the following measures and standards:

- improved emissions standards for light-duty vehicles (26.1 MMT CO$_2$e);
- the Low-Carbon Fuel Standard (LCFS) (15.0 MMT CO$_2$e);
- energy efficiency measures in buildings and appliances (11.9 MMT CO$_2$e); and
- renewable portfolio and electricity standards for electricity production (23.4 MMT CO$_2$e).

In 2011, CARB adopted a cap-and-trade regulation. The cap-and-trade program covers major sources of GHG emissions in the state such as refineries, power plants, industrial facilities, and transportation fuels. The cap-and-trade program includes an enforceable emissions cap that will decline over time. The state distributes allowances, which are tradable permits, equal to the emissions allowed under the cap. Sources under the cap are required to surrender allowances and offsets equal to their emissions at the end of each compliance period. Enforceable compliance obligations started in 2013. The program applies to facilities that comprise 85 percent of the state's GHG emissions. In early April 2017, the Third District Court of Appeal upheld the lawfulness of the cap-and-trade program as a “fee” rather than a “tax.” (See California Chamber of Commerce et al. v. State Air Resources Board et al. (2017) --- Cal.App.5th ---.)

With regard to land use planning, the scoping plan expects that reductions of approximately 3.0 MMT CO$_2$e will be achieved through implementation of Senate Bill (SB) 375, which is discussed further below.

**2014 Scoping Plan Update.** In response to comments on the 2008 scoping plan, and AB 32's requirement to update the scoping plan every five years, CARB revised and reapproved the
The 2014 scoping plan contains the main strategies California will implement to achieve a reduction of 80 MMT of CO₂e emissions, or approximately 16 percent, from the state’s projected 2020 emission level of 507 MMT of CO₂e under the business-as-usual scenario defined in the 2014 scoping plan. The 2014 scoping plan also includes a breakdown of the amount of GHG reductions CARB recommends for each emissions sector of the state’s GHG inventory. Several strategies to reduce GHG emissions are included: the Low Carbon Fuels Standard, the Pavley Rule, the Advanced Clean Cars program, the Renewable Portfolio Standard, and the Sustainable Communities Strategy.

California Senate Bill 375 (Sustainable Communities Strategy). This 2008 bill sets forth a mechanism for coordinating land use and transportation on a regional level for the purpose of reducing GHGs. The focus is to reduce miles traveled by passenger vehicles and light trucks. CARB is required to set GHG reduction targets for each metropolitan region for the years 2020 and 2035. Each of California’s metropolitan planning organizations then prepares a sustainable communities strategy (SCS) that demonstrates how the region will meet its GHG reduction target through integrated land use, housing, and transportation planning. Once adopted by the metropolitan planning organizations, the SCS is to be incorporated into that region’s federally enforceable regional transportation plan. If a metropolitan planning organization is unable to meet the targets through the SCS, then an alternative planning strategy must be developed which demonstrates how targets could be achieved, even if meeting the targets is deemed to be infeasible.

The AMBAG is the metropolitan planning organization responsible for preparing the SCS. The current SCS is embedded in AMBAG’s 2035 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties (Association of Monterey Bay Area Governments 2014) (MTP/SCS). The SCS sets forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, is intended to reduce GHG emissions from passenger vehicles and light duty trucks to achieve the regional GHG reduction targets set by CARB.

SB 375 specifically states that local governments retain their autonomy to plan local General Plan policies and land uses. The 2035 MTP/SCS provides a regional policy foundation that local governments may build upon, if they so choose. The 2035 MTP/SCS includes and accommodates the quantitative growth projections for the region. In addition, the 2035 MTP/SCS EIR lays the groundwork for the streamlined CEQA review of qualifying development projects. Such projects are defined as Transit Priority Projects that are located within an Opportunity Area that meet specific criteria, including:
Consistent with the SCS;

Contains at least 50 percent residential use;

Proposed to be developed at a minimum 20 dwelling units per acre; and

Located within one half mile of a major transit stop or high quality transit corridor that is included in the MTP/SCS.

None of the Target Areas are proposed for development with residential uses, as the primary purpose of the EDE to provide new land capacity for job-generating economic development. Therefore, future projects proposed within the Target Areas would not be eligible for streamlined CEQA review.

**California Senate Bill 97.** As directed by SB 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines for GHG emissions on December 30, 2009. On February 16, 2010, the Office of Administrative Law approved the Amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. The amendments became effective on March 18, 2010. CEQA allows lead agencies to analyze and mitigate the significant effects of GHG emissions at a programmatic level, such as in a general plan, or as part of a separate plan (e.g., a climate action plan) to reduce GHG emissions.

**Title 24 Standards/Energy Conservation.** California’s Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were first established in 1978 to reduce California’s energy consumption. Title 24 is updated every three years. The most recent 2016 version of the standards went into effect on January 1, 2017. Energy efficient buildings require less electricity, natural gas, and other fuels, the use of which creates GHG emissions. The 2016 update requires new buildings to become more energy-efficient than ever before. For example, single family homes built to the 2016 standards will use about 28 percent less energy for lighting, heating, cooling, ventilation, and water heating than those built to the 2013 standards. The 2016 standards will be updated in 2019. The 2019 standards will require that all new residential development have net zero energy demand.

**California Green Building Standards Code.** The Green Building Standards Code (CALGreen), which requires all new buildings in the state to be more energy efficient and environmentally responsible, took effect on January 1, 2011. These comprehensive regulations will achieve major reductions in greenhouse gas emissions, energy consumption and water use.

**Renewable Energy Legislation/Orders.** The California Renewable Portfolio Standard Program (RPS) requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet a portion of their retail sales with renewable power. SB 1078, adopted in 2002, required 20 percent of retail sales to be met with renewable power by 2017. The
requirement was accelerated to 20 percent by 2010 by SB 107 in 2006. The program was subsequently expanded in September 2010 by requiring all utilities to meet a 33 percent target by 2020. Governor Brown then signed AB 350, the Clean Energy and Pollution Reduction Act of 2015, which increases the RPS requirement to 50 percent of all retail sales by 2030.

California Assembly Bill No. 1493 (“Pavley I Rule”). AB 1493 was enacted on July 22, 2002. It required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light-duty trucks by improving fuel efficiency requirements. Pavley I requirements apply to these vehicles in the model years 2009 to 2016. CARB has estimated the effectiveness of Pavley I standards on vehicle emission factors and estimates that these standards will reduce GHG emissions in the transportation sector by 20 percent in 2020 and 25 percent in 2035 above and beyond a scenario without these standards.

Advanced Clean Cars. In January 2012, CARB adopted an Advanced Clean Cars program aimed at reducing both smog-causing pollutants and GHG emissions for vehicles model years 2017-2025. Advanced clean cars (ACC) refers to suite of regulations that combine what were previously independent regulations that targeted GHG emissions reductions and smog emissions from passenger cars and light-duty trucks. The regulations focus on substantially increasing the number of plug-in hybrid cars and zero-emission vehicles in the vehicle fleet and on making fuels such as electricity and hydrogen readily available for these vehicle technologies.

The ACC program would provide major reductions in GHG emissions. By 2025, the program is projected to result in a 34 percent reduction in GHG emissions from new passenger cars and trucks.

Executive Order S-01-07 Low Carbon Fuel Standard. Issued on January 18, 2007, this order mandates that a statewide goal be established to reduce the carbon intensity of California’s transportation fuels by at least 10 percent by 2020 and that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established. The LCFS has been developed and implemented by CARB. CARB has incorporated the GHG emissions reductions accruing to the LCFS into the 2014 scoping plan as described above.

Executive Order S-13-08. This Executive Order enhances the state's management of climate impacts from sea level rise, increased temperatures, shifting precipitation and extreme weather events. In December 2009, the California Natural Resources Agency released the 2009 California Climate Adaptation Strategy Discussion Draft. The document provides interim guidance to state and local agencies on planning for the impacts and risks of climate change.

Executive Order B-30-15. Issued on April 29, 2015, this order advances the intent of Executive Order S-03-05 by establishing a California GHG reduction target of 40 percent below 1990 levels by 2030. The new emission reduction is intended to be an interim target that maintains a reduction trajectory towards meeting the state’s goal of reducing emissions to 80 percent below
1990 levels by 2050 as identified in Executive Order S-03-05. This is in line with the scientifically established levels needed in the U.S. to limit global warming below two degrees Celsius - the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.

**California Senate Bill 350 (Clean Energy and Pollution Reduction Act of 2015).** SB 350 was adopted in October 2015. It has several aspects. Among its requirements are that the State Energy Resources Conservation and Development Commission must establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030. Local publicly owned electric utilities are now required to establish annual targets for energy efficiency savings and demand reduction consistent with this goal. The bill also is intended achieve GHG reductions through increased investments in transportation electrification and notes that reducing GHGs to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050 (consistent with Executive orders S-03-05 and S-30-15) will require widespread transportation electrification.

**California Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit).** This bill was adopted in September 2016. It sets a new statewide GHG emissions reduction target of at least 40 percent below 1990 levels by the end of 2030. It represents an interim GHG reduction target designed to ensure that the state continues to adopt rules and regulations that keep the state on track to meet the 2050 statewide GHG reduction goal of 80 percent below 1990 levels by 2050 set forth in Executive Order S-03-05. The emissions reduction goal set in SB 32 sets expectations for GHG emissions reductions in the state in the post-AB 32 2020 environment given that emissions reduction goals set forth in AB 32 should have been reached by 2020.

**Assembly Bill 197** In the 2016 legislative session, the Legislature passed, and the Governor signed, Assembly Bill 197 (AB 197). This legislation requires CARB to make available the emissions of greenhouse gases, criteria pollutants, and toxic air contaminants for each facility that reports to the state board and air districts. In addition, this bill requires that CARB make available the emissions of greenhouse gases, criteria pollutants, and toxic air contaminants throughout the state, broken down to a local and sub-county level for stationary sources and to at least a county level for mobile sources, as specified.

**Draft 2017 Scoping Plan.** With the passage of SB 32, the Legislature also passed companion legislation AB 197, which provides additional direction for developing the scoping plan. CARB expects to adopt the draft 2017 Scoping Plan in 2017. The draft 2017 Scoping Plan represents a second update to the scoping plan to reflect the 2030 target of reducing statewide GHG emissions by 40 percent below 1990 levels set by Executive Order B-30-15 and codified by SB 32. The GHG reduction strategies in the plan that CARB will implement to meet the target include:
- SB 350 - achieve 50 percent Renewables Portfolio Standard (RPS) by 2030 and doubling of energy efficiency savings by 2030;
- Low Carbon Fuel Standard - increased stringency (reducing carbon intensity 18 percent by 2030, up from 10 percent in 2020);
- Mobile Source Strategy (Cleaner Technology and Fuels Scenario) - maintaining existing GHG standards for light- and heavy-duty vehicles, put 4.2 million zero-emission vehicles on the roads, and increase zero-emission buses, delivery and other trucks;
- Sustainable Freight Action Plan - improve freight system efficiency, maximize use of near-zero emission vehicles and equipment powered by renewable energy, and deploy over 100,000 zero-emission trucks and equipment by 2030;
- Short-Lived Climate Pollutant Reduction Strategy - reduce emissions of methane and hydrofluorocarbons 40 percent below 2013 levels by 2030 and reduce emissions of black carbon 50 percent below 2013 levels by 2030;
- SB 375 Sustainable Communities Strategies - increased stringency of 2035 targets;
- Post-2020 Cap-and-Trade Program - declining caps, continued linkage with Québec, and linkage to Ontario, Canada;
- 20 percent reduction in greenhouse gas emissions from the refinery sector; and
- By 2018, develop an Integrated Natural and Working Lands Action Plan to secure California’s land base as a net carbon sink.

Local Plans and Policies

Monterey Bay Air Resources District. Salinas is located within the boundary of the Monterey Bay Air Resources District (“air district”). To date, the air district has not adopted CEQA guidance for analysis of GHG effects of land use projects; nor has it prepared a qualified GHG reduction plan for use/reference by local agencies.

City of Salinas. The City’s current climate change planning framework is embedded in the Final Supplement for the City of Salinas General Plan Final Program EIR (GP SEIR), which the City certified in 2007. The GP SEIR focused primarily on analysis of potential environmental impacts of the City’s proposal to annex a large area of land to the north and east of the City known as the Future Growth Area. The General Plan FEIR, certified in 2002, had addressed impacts of the annexation at a programmatic level. However, between the time the General Plan FEIR was certified in 2002 and the time the City formally began consideration of the Future Growth Area sphere-of-influence amendment and annexation, the environmental setting utilized in the
General Plan FEIR had changed. The GP SEIR was prepared to address certain potential impacts of the Future Growth Area annexation under more current environmental setting conditions.

Climate change impacts of General Plan buildout, including buildout of the Future Growth Area, were not evaluated in the General Plan FEIR. With the passage of AB 32 in 2006 and the rising tide of international, state, and local concern about climate change, the City incorporated analysis of potential climate change impacts of buildout under the General Plan into the GP SEIR to address this change in regulatory setting that had occurred after 2002.

The GP SEIR included a basic GHG inventory and projection of GHG emissions under General Plan build out. A quantified emissions reduction target for 2020 was not included in the analysis. General Plan buildout GHG emissions were projected to be 46 percent higher than under baseline conditions in 2000. Nevertheless, the analysis in the GP SEIR was used to conclude (page 5.5-15) that the incremental GHG emissions associated with development under the General Plan would:

...cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions. By generating increased emissions that contribute to global climate change, development that occurs in accordance with the General Plan throughout the City of Salinas and within the SOI Amendment and Annexation areas would incrementally contribute to the adverse economic, public health, natural resources, and other environmental impacts mentioned earlier in this section that are projected to occur in California and throughout the world as a result of global climate change.

The GP SEIR includes nine global climate change mitigation measures (GCC measures) designed to reduce significant unavoidable climate change impacts. Several are based on the 2007 Pilot Version of the Leadership in Energy and Environmental Design (LEED) for Neighborhood Development Rating System. As stated on page 5.5-15 of the GP SEIR, “the mitigation measures shall be applied to development projects throughout the City of Salinas where feasible to reduce the cumulatively significant incremental contribution to global climate change.” Three of the nine GCC measures are either actions that are the responsibility of the City (GCC measures 1 and 6) or do not apply to future commercial and industrial development as planned within the Target Areas (GCC measure 5 regarding LEED Neighborhood Design). Six measures that have relevance to development within the Target Areas are summarized as follows:

- SEIR GCC 2: Prioritize parking for electric, hybrid, and alternative fuel vehicles;
SEIR GCC 3: Construct 50 percent of the building square footage to be capable of being certified under one of the Leadership in Energy and Environmental Design (LEED) or equivalent rating systems;

SEIR GCC 4: Incorporate renewable energy generation (on- or off-site) to provide 15 percent or more of the project’s energy needs;

SEIR GCC 7: Recycle and/or salvage at least 50 percent of nonhazardous construction and demolition debris;

SEIR GCC 8: Reduce heat gain for 50 percent of the non-roof impervious site landscape (including roads, sidewalks, courtyards, parking lots, and driveways); and

SEIR GCC 9: Incorporate green building points such as those achievable through Builditgreen or a similar checklist. Target energy efficiency, resource use, or other measures that result in GHG emissions reductions.

The SEIR was certified over 10 years ago. The state of the art in climate change planning and mitigation has advanced dramatically since that time. As such, the City currently considers the measures to be applicable to all development unless alternative mitigation from a subsequent environmental analysis is applied.

Thresholds of Significance

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes two factual inquiries related to the subject of impacts from GHG emissions, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on the subject of impacts from GHG emissions, or indeed on any subject addressed in the checklist. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

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

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
3.0 Environmental Setting, Impacts and Mitigation Measures

Analysis, Impacts, and Mitigation

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

It should be noted that the modeling and analysis presented herein assumes that conceptual expressways proposed in the EDE are constructed. These have since been removed from the project description. Additional technical review was performed by a third party technical expert to determine whether or not the identified levels of significance would change as result of the expressway removal. In terms of climate change impacts, removal of the expressways would not be expected to cause the project to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Related to GHG emissions, removal of the expressways would result in a decrease in project construction emissions, such that the analysis presented herein may be conservative. Refer to Appendix E for a summary of the changes to the GHG analysis as a result of expressway removal.

Selection of a Threshold of Significance/Reduction Target on which to Base Analysis of Project Effects

State CEQA Guidelines Section 15064.4 addresses the approach for evaluating the significance of GHG emissions effects. This provision states that lead agencies “shall have discretion to determine, in the context of a particular project, whether to:

(1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or

(2) Rely on a qualitative analysis or performance based standards.”

Based on this language, a recent Court of Appeal decision allowed a purely qualitative analysis of GHG impacts against an attack claiming that some sort of quantitative analysis was absolutely necessary to comply with CEQA. (Mission Bay Alliance v. Office of Community Investment and Infrastructure (2016) 6 Cal.App.5th 160, 198-203.)

State CEQA Guidelines Section 15064.7(c) states that when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by
other public agencies, or recommended by experts. Although the City is not adopting a threshold for general use pursuant to this provision, its discussion of the potential sources of input for considering the use of a threshold for this EIR is helpful. This discussion summarizes the City’s approach for considering the GHG impacts of the proposed project in light of a changing state legislative/regulatory environment and the long-term buildout timeframe for the proposed project.

**AB 32 and the 2008 Scoping Plan Guidance.** The full annual GHG effects of the proposed project would not occur until its assumed buildout year of 2045. With the adoption of AB 32 in 2006, local and regional agencies began to align their CEQA processes and craft GHG thresholds of significance to be consistent with the year 2020 reduction goal embedded in AB 32 and further operationalized in the subsequent 2008 scoping plan. Year 2020 is rapidly approaching. No new development within the Target Areas would occur prior to that time. Therefore, AB 32 and 2008 scoping plan based GHG reduction targets and reduction plans that might otherwise be used by the City as a basis to assess impacts of the proposed project are not applicable.

As a side note, the defensibility of using AB 32 and the 2008 scoping plan as a basis for a project specific threshold of significance for local projects has been called into question based on a the California Supreme Court’s recent decision in *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 204 (commonly referred to as the “Newhall” case). In November 2015, the court issued a ruling that, in short, concluded that the statewide 29 percent below business-as-usual (BAU) reduction specified in the 2008 scoping plan can be used as a threshold of significance for individual development projects. However, the court also determined that if this BAU threshold is used, substantial evidence must be provided to demonstrate that achieving this percentage reduction at an individual project level is sufficient to determine that the project has a less-than- significant GHG emissions impact. The court found that the CEQA document which was the subject of the lawsuit did not provide this evidence. Indeed, the court explained that the assumption that a particular project must achieve the same percentage reduction compared to a BAU scenario as the state as a whole was too simplistic. The court explained:

> At bottom, the EIR’s deficiency stems from taking a quantitative comparison method developed by the Scoping Plan as a measure of the [GHG] emissions reduction effort required by the state as a whole, and attempting to use that method, without consideration of any changes or adjustments, for a purpose very different from its original design: To measure the efficiency and conservation measures incorporated in a specific land use development proposed for a specific location. (62 Cal.4th at p. 227.)
The ruling called into question what had been a standard CEQA analysis methodology for assessing GHG impacts of individual projects within a city or air district where neither agency has adopted a qualified GHG reduction plan and/or a threshold of significance. The court provided no clear guidance on appropriate thresholds of significance for individual development projects that might be used to assess their GHG impacts. The court did, however, suggest several options for evaluating the cumulative impacts of proposed land use developments. One of these is reliance on “existing numerical thresholds of significance for greenhouse gas emissions”. As noted above, neither the City, nor the air district has adopted numerical thresholds of significance or qualified GHG reduction plans that could otherwise be used as a threshold of significance in light of the Newhall case.

**SB 32, Executive Order B-30-15, and SB 350 Guidance.** With the Governor’s issuance of Executive Order B-30-15 and subsequent signing of SB 350 in October 2015 and SB 32 in September 2016, the state is now officially on the path to achieving a 40 percent reduction in GHG emissions by 2030. SB 32 supplants the previous AB 32 and 2008 scoping plan reduction target. CARB is currently in the process of updating the scoping plan to identify strategies the state will implement to achieve the 2030 target. The scoping plan update will be an aid to local and regional agencies, including air districts, for updating their existing qualified GHG reduction plans, preparing new plans that reflect the 2030 target, and/or potentially identifying new thresholds of significance that consider the deeper GHG reductions necessary to meet the 2030 target. It is likely that most local lead agencies will wait until the new scoping plan is adopted before beginning this process. Via its decision in the Newhall case, the California Supreme Court has called into question the validity of using a statewide emissions reduction goal, in terms of a percentage decrease from a BAU scenario, as a standard of significance for a local land use project. Hence, in the near term, local agencies that do not currently have or will not have the opportunity to revise their current adopted greenhouse gas reduction plans to reflect the 2030 target, may be at risk if they choose to use compliance with such greenhouse gas reduction plans as a threshold of significance for 2030 or for prior years.

Year 2030 is closer to the assumed 2045 buildout time horizon for the proposed project than the year 2020 AB 32 reduction target. Thus, it would be a more representative reference point for assessing the interim effects of the proposed project than is the 2020 target. However, quantifying projected GHG emissions for the year 2030 is considered to be too speculative to provide value as a tool for disclosing possible interim GHG effects of the proposed project. To quantify project emissions for 2030, the City would need to project an annual growth rate for industrial, retail, and business park development within the Target Areas. While the City could project anticipated growth rates by utilizing historical growth rates for these use types and projecting those rates forward, several variables would make such projections unreliable. Variables include, but are not limited to: effects of the economic recession and its effects on growth rates over the past decade, uncertainty about the locational needs of new employment generating uses, the degree to which new employment generating development can be
accommodated on vacant or underutilized infill parcels (whose development would occur independent of the proposed project) versus within one or more of the Target Areas, and future market demand for industrial, retail, and business park development in the region and the City.

As has been previously stated, the City to date has not prepared a GHG reduction plan. However, the City is undertaking visioning process for a general plan and will start an update in 2018. This will afford the City an opportunity to craft a new general plan that could also serve as a qualified GHG reduction plan or to prepare a separate climate action plan in conjunction with the general plan update. The 2030 reduction target of 40 percent below 1990 levels will inform the City’s approach to crafting a reduction plan and inform the types of integrated, aggressive GHG reduction measures that should be included in it.

New development proposed within one or more of the Target Areas would then be required to integrate applicable GHG reduction measures included in the City reduction plan as a means to mitigate its GHG impacts. The CEQA process for analyzing GHG impacts of the future projects could then be streamlined given project compliance with the reduction plan.

If the City does not have a qualified GHG reduction plan in place or a qualified GHG reduction plan prepared by another agency and valid for use by the City by the time the first project is proposed within a Target Area, the analysis of its GHG impacts would be based on the applicable GHG reduction guidance in effect at the time. That guidance may come from the local air district or other source with the guidance informed by direction provided in the scoping plan update that is now in progress and/or by subsequent scoping plan updates.

Executive Order S-03-05. Through Executive Order S-03-05, former Governor Schwarzenegger announced what he regarded as a state’s goal of reducing by 2050 GHG emissions to 80 percent below 1990 levels. This long-term goal has not been expressly adopted by the Legislature, however, which in SB 32 looked no further out in time than 2030. Although SB 350, as noted earlier, contains references to challenges associated with reducing GHG emissions by 80 percent below 1990 levels by 2050, most observers believe that the Legislature has not directly embraced a 2050 target. Refer back to the discussion of Executive Order S-03-05 in the Regulatory Setting section above for a discussion of the California Supreme Courts July 2017 decision in the Cleveland National Forest Foundation case, where the court found that in the particular case at issue, the lead agency was not required to consider the 2050 reduction goal embodied in Executive Order S-03-05 to be a threshold of significance.

CEQA documents typically avoid predicting impacts into the far distant future because such predictions are typically little more than speculation and generate little confidence in their accuracy. With respect to the topic of climate change, predicting conditions in 2050 is particularly speculative, given the substantial changes in climate science, GHG reduction technologies, and climate-sensitive land use planning that are likely to occur between the present and 2050.
As described in Beyond 2020: The Challenge of Greenhouse Gas Reduction Planning by Local Governments in California (Association of Environmental Professionals 2015), based on research into pathways to deep GHG emissions reductions needed by 2050, the changes are substantial and severe and would require fundamental changes in California's energy system, many of which are outside the control of individual cities and counties. Achieving deep GHG emission reductions within California will require a coordinated effort across all sectors of the economy. In nearly all the deep reduction scenarios, the rate of transition, such as deployment of better vehicles, or renewable electricity, far exceeds the historical rate of change in the state to date. This adds uncertainty for how local jurisdictions are to approach achieving deeper GHG reduction from new development given shifting technologies, energy/technology prices, and regulations.

In this context, there is significant evidence that requiring compliance with the 2050 goal in Executive Order S-03-05 as a de facto significance threshold could involve substantial speculation. And given the unusual nature of the proposed project addressed in this EIR, which involves potential future land uses that remain vague and uncertain at present, a qualitative approach to this subject matter is appropriate.

**IMPACT: GENERATION OF SIGNIFICANT GREENHOUSE GAS EMISSIONS IN THE BUILDOUT YEAR OF 2045 (SIGNIFICANT AND UNAVOIDABLE)**

Like the speculative nature of utilizing year 2050 as a target reduction year, utilizing the project buildout year of 2045 as a target reduction year is also considered speculative. Substantial uncertainty exists about if and how a 2045 reduction target can be achieved given the substantial reductions that must occur. Further, the role of local agencies in contributing their fair share to such reductions has not been enumerated by any state or regional agency to date. Nevertheless, for purposes of disclosure and discussion, the proposed project's potential GHG effects at buildout are considered in light of a 2045 emissions reduction target. Although neither the Legislature nor the current or prior Governor has identified an explicit target for the year 2045, one can fashion such a target through extrapolation applied to the targets that have been identified and the downward emissions trajectory associated with those targets. Using a straight line extrapolation between the statewide GHG emission reduction goals for 2020 and 2050, statewide GHG emissions would need to decline by about 72 percent below 1990 levels in 2045 to remain on target for meeting the 2050 goal of 80 percent below 1990 levels.

Over time, it is likely that, if current legislative policies remain in place and are updated in the future, state and/or regional agencies will develop emissions reduction guidance that is applicable to the year 2045. This is likely to occur once year 2030 reduction target goals have been achieved and the 2050 target becomes the next potential final time horizon for achieving the state's ultimate emissions reduction goal. In short, there is no currently defined pathway for
achieving GHG reductions of 72 percent in 2045 and, consequently, no reliable standards of significance against which projections of GHG emissions from project buildout can be assessed. Even if this were possible, the fundamental changes in technology and energy systems; cooperation between diverse sectors of the economy; and collaboration among state, regional, and local agencies that would be required to achieve the goal are yet to be articulated.

In light of all of the foregoing, the City's methodology for assessing GHG effects of the proposed project in 2045 is generally as follows: 1) calculate annual baseline emissions from existing activities; 2) calculate projected annual operational and construction phase emissions from future uses; 3) amortize construction emissions to determine annual volume and add the annual volume to projected new annual projected operational emissions to arrive at total new annual projected emissions; 4) subtract emissions reductions resulting from current scoping plan actions and applicant proposed reduction measures (if any); 5) subtract baseline emissions to determine net new emissions; 6) compare net new emissions to a selected threshold of significance, if any; 7) determine significance of the impact; 8) if the impact is significant, apply additional feasible reductions and calculate mitigated project GHG volume; and 9) reassess mitigated annual emissions volume against the threshold and determine mitigated project impact significance.

**Baseline (Existing) Target Area GHG Emissions**

Land within the Target Areas is currently in agricultural use and is largely in row crop production. Agricultural production activities are a source of GHG emissions. The primary source is electricity generation for irrigation water pumping and operation of farm equipment. To be conservative and due to uncertainty about the intensity of farm equipment use, this one component of baseline emissions activities is not further evaluated. To estimate GHG emissions volume from electricity generation for water pumping, total annual water demand, electrical energy demand per unit volume of water demand, and a GHG emissions factor per unit of electrical energy demanded for water pumping are needed.

Irrigation rates vary per crop type. At the lower rate end, average demand for strawberries is 1.9 feet/acre/crop. Broccoli and cauliflower are at the higher rate end at 4.04 feet/acre/crop. Water demand for lettuce is 2.1 feet/acre/crop (Yarne & Associates 2015, p. 8). For purposes of this analysis, it is assumed that these four crop types are grown within the Target Areas and expressway locations. Broccoli and cauliflower are grouped together because their irrigation water demand rate is the same. Given that these four crop types also represent a reasonable range of irrigation water demand rates, it is assumed that these crop types are grown in equal proportion on land within the Target Areas and expressway locations. Table 22, Existing Agricultural Water Use, shows that the average irrigation water demand rate per acre would be 2.67 AFY.
### Table 22 Existing Agricultural Water Use

<table>
<thead>
<tr>
<th>Crop</th>
<th>Acres^1</th>
<th>Average Water Demand per Acre^2 (AFY)</th>
<th>Crops Per Year per Acre</th>
<th>Total Agricultural Water Demand (AFY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strawberries</td>
<td>251</td>
<td>2.67</td>
<td>2</td>
<td>2,680</td>
</tr>
<tr>
<td>Broccoli/Cauliflower</td>
<td>251</td>
<td>2.67</td>
<td>2</td>
<td>2,680</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>502</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Source:* EMC Planning Group 2017

*Notes:*  
^1Total acreage comprised of Target Areas  
^2Average water demand factor from West Area Specific Plan, Salinas California, SB 610 Water Supply Assessment 2015.

The typical energy intensity for electricity used to supply, treat, and distribute water in northern California as referenced in CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* (page 342) is 3,500 kWh per 1,000,000 gallons of water. Since irrigation water used within the Target Areas is sourced from local wells, the typical energy intensity value is likely lower and assumed to be 2,000 kWh per 1,000,000 gallons of water. Information obtained from utility providers, in this case Pacific Gas and Electric, can be used to estimate electrical demand per unit of water demand and GHG emissions volumes per unit of energy consumed. At an estimated volume of 873,251,200 gallons of agricultural water demand (2,680 AFY x 325,840 gallons/AF), agricultural water pumping generates demand for approximately 1,750 megawatt hours (MWh) of electricity per year. Per Pacific Gas and Electric’s *Greenhouse Gas Emission Factors: Guidance for PG&E Customers, April 2013*, 0.196 metric tons of CO₂e are produced for each MWh of electricity produced within its service area (http://www.pge.com/includes/docs/pdfs/shared/environment/calculator/pge_ghg_emission_factor_info_sheet.pdf). Applying this factor to the existing agricultural water pumping electricity demand yields a GHG emissions baseline of approximately 343 metric tons (MT) CO₂e per year. This information is summarized in Table 23, Baseline Agricultural GHG Emissions.

### Table 23 Existing Agricultural GHG Emissions

<table>
<thead>
<tr>
<th>Water Pumping Energy Intensity</th>
<th>Agricultural Water Demand/Year</th>
<th>Agricultural Water Demand/Year</th>
<th>Metric Tons GHG/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 kWh per 1,000,000 gallons</td>
<td>873,251,200</td>
<td>2,680 acre feet/year</td>
<td>343</td>
</tr>
</tbody>
</table>

*Source:* EMC Planning Group 2017
Quantification of Operational and Construction GHG Emissions at Project Buildout

Year 2045 operational and construction GHG emissions projections related to buildout of the Target Areas were made using the California Emissions Estimator Model (CalEEMod). The CalEEMod modeling results are included in Appendix E. Appendix E also contains a memorandum describing the CalEEMod modeling assumptions and methodology.

**CalEEMod 2045 Operational Emissions Results.** Mobile and non-mobile source GHG emissions were estimated using CalEEMod. Mobile source emissions are generated through combustion of fuel in vehicles. Based on the land use types input into CalEEMod, the model makes assumptions about vehicle types, vehicle miles traveled, and emissions factors for vehicle travel resulting from development of the Target Areas. The primary classes of non-mobile source GHG emission sources are: 1) area – GHG emissions generated with a project site from combustion of natural gas for heating or other processes; 2) energy – primarily GHG emissions resulting from the off-site generation of electricity consumed by a project; 3) water supply – GHGs from off-site energy generation needed for pumping, treating and distributing water and wastewater; and 4) solid waste – methane, a powerful GHG, is a by-product of the anaerobic decomposition of solid waste that is delivered to a landfill for burial.

Land use information from the project description in Section 2.0 was utilized as the primary data input to the CalEEMod model. A multitude of assumptions were made to derive inputs to CalEEMod. These are summarized in Appendix E along with the model results. Table 24, 2045 Annual Operational GHG Emissions, summarizes unmitigated emissions volumes estimates. CalEEMod results for annual operational GHG emissions are summarized in Table 2.2, Overall Operational, Unmitigated, in the CalEEMod printout located in Appendix E.

**Table 24  2045 Annual Operational GHG Emissions**

<table>
<thead>
<tr>
<th>Condition</th>
<th>GHG Source</th>
<th>MT CO₂e/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2045 Project Buildout</td>
<td>Area</td>
<td>.14</td>
</tr>
<tr>
<td></td>
<td>Energy</td>
<td>14,385.12</td>
</tr>
<tr>
<td></td>
<td>Mobile</td>
<td>117,189.17</td>
</tr>
<tr>
<td></td>
<td>Waste</td>
<td>2,829.86</td>
</tr>
<tr>
<td></td>
<td>Water</td>
<td>1,766.31</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>136,170.60</strong></td>
</tr>
</tbody>
</table>

*Source: CalEEMod, EMC Planning Group 2017*
Life cycle GHG emissions are emissions associated with the use of a product at all the stages its use from cradle to grave (i.e., from raw material extraction through materials processing, manufacture, distribution, use, repair and maintenance, and disposal or recycling), including those generated during the manufacture of products to be used in construction of future developments. Upstream GHG emission sources for land development related projects can include, but are not limited to: extraction of natural resources used to manufacture building materials, manufacturing process for building materials such as cement and steel, transportation of building materials, etc. Upstream emissions volumes are difficult to evaluate with precision, especially at the program level of analysis being conducted in this EIR, and so have not been included in the 2035 GHG emissions estimate. This is consistent with standard CEQA methodologies, which make no attempt to incorporate full “life cycle” analyses. (See Save the Plastic Bag Coalition v. City of Manhattan Beach (2011) 52 Cal.4th 155, 175-176.)

CalEEMod Target Area Buildout Construction Emissions Modeling Results. During construction of new development within the Target Areas, GHG emissions will be generated from a variety of sources. These include, but are not limited to the following: on-road mobile sources that include worker and construction/materials vehicle trips to and from development sites; off-road mobile sources that include vehicles and construction equipment such as bulldozers, water trucks, graders, water trucks, etc.; and indirect emissions from production of electricity used in construction processes. The vast majority of GHG emissions generated from these sources would be in the form of CO₂, CH₄, and N₂O. Construction emission volumes would vary on a daily basis depending on the level of construction activity and the type of activity. Construction activities would take place incrementally over an assumed 30-year buildout period, though periods of no construction activity are likely.

Construction emissions were estimated using CalEEMod. The calculation methodology assumptions are described in Appendix E. The results are shown in section 2.1, Overall Construction, Unmitigated Construction in the CalEEMod results in Appendix E. Default values for construction equipment types and durations are used given that information for future construction activities is not available. Table 25, Target Area Buildout Construction GHG Emissions, includes a summary of construction emissions. It is common practice to amortize construction emissions on an annual basis over an assumed lifespan of a project. For purposes of this proposed project, that lifespan is assumed to be 30 years. The annual amortized construction emission volume is also shown in Table 25. This value is a component of the total annual emissions volume for the proposed project.

Total 2045 Buildout Annual Unmitigated GHG Emissions. Table 26, Annual Unmitigated GHG Emissions at Buildout, includes the sum of the mobile source, non-mobile source, and amortized construction GHG emissions estimates described above. The annual total is projected at 139,085.52 CO₂e/year. This volume represents GHG projections assuming conditions
existing in 2017 remain constant to the year 2045. As previously noted, the annual unmitigated emissions volume includes GHG emissions reductions from several state legislative and regulatory measures that are incorporated into the emissions factors used in CalEEMod.

**Table 25  Target Area Buildout Construction GHG Emissions (MT/year)**

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>Bio CO₂</th>
<th>NBio CO₂</th>
<th>CH₄¹</th>
<th>N₂O²</th>
<th>CO₂e</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction</td>
<td>---</td>
<td>87,315.39</td>
<td>5.09</td>
<td>--</td>
<td>87,442.70</td>
</tr>
<tr>
<td>Annual (30-year) Amortized Construction Emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2,914.93</td>
</tr>
</tbody>
</table>

*Source:* CalEEMod, EMC Planning Group 2017

*Notes:* Abbreviations: CH₄ – methane, CO₂ - carbon dioxide, N₂O - nitrogen dioxide, CO₂e - carbon dioxide equivalents. Bio CO₂ represents emissions generated by biological processes, primarily decomposition of waste in a landfill. Nbio CO₂ represents emissions generated by all other sources, primarily fossil fuel combustion.

¹CH₄ volume multiplied by its GWP of 21 to arrive at CO₂e.
²N₂O volume multiplied by its GWP of 310 to arrive at CO₂e.

**Table 26  Annual Unmitigated GHG Emissions at Buildout**

<table>
<thead>
<tr>
<th>Condition</th>
<th>GHG Source</th>
<th>MT CO₂e/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Buildout</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mobile</td>
<td></td>
<td>117,189.16</td>
</tr>
<tr>
<td>Non-Mobile</td>
<td></td>
<td>18,981.43</td>
</tr>
<tr>
<td>Amortized Target Area Construction</td>
<td></td>
<td>2,914.93</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>139,085.52</td>
</tr>
</tbody>
</table>

*Source:* CalEEMod, EMC Planning Group 2017

**Legislative and Regulatory Emissions Reductions**

The GHG emissions volume identified in Table 26 is the projected volume from buildout of the Target Areas, including GHG reductions that accrue from several state regulatory and legislative actions that are built into CalEEMod such as the Pavley I standards and Low Carbon Fuel Standards. GHG emissions reductions from several state legislation and state regulations enacted to implement the 2008 and 2014 scoping plans are not included in CalEEMod. Additional reductions from these state actions can be subtracted from the estimated unmitigated annual buildout GHG volume, as they are currently being implemented. Applicable legislation and regulations, the GHG sectors to which they are applicable, and the percentage reduction in GHG emissions that can be taken from the relevant sector are identified in Table 27, Legislative and Regulatory Emissions Reductions. These actions are summarized in the Regulatory Setting section above.
Table 27 Legislative and Regulatory Emissions Reductions

<table>
<thead>
<tr>
<th>Legislation/Regulation</th>
<th>Reduction Sector</th>
<th>Percent Reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Renewable Portfolio Standard</td>
<td>Energy/Water</td>
<td>50 percent in 2030¹</td>
</tr>
<tr>
<td>Title 24, Part 6, Building and Appliance Energy Efficiency</td>
<td>Energy</td>
<td>30 percent (non-residential) in 2020²</td>
</tr>
</tbody>
</table>

Source: EMC Planning Group 2017

Note: ¹Per SB 350, the RPS procurement must increase to 50 percent by 2030.

Table 28, Annual GHG Emissions Reductions from Legislative and Regulatory Actions, shows reduction volumes that result when the legislative and regulatory reductions shown in Table 27, are applied to the unmitigated annual operational emissions shown in Table 26. The legislative/regulatory emissions reductions are conservative. They do not reflect emissions reductions from other legislation and regulations that will result in accelerated emissions reductions after 2020. For example, California’s Long-Term Energy Efficiency Strategy, adopted in 2008, has set aggressive goals that will likely be implemented through future updates to the Building Energy Efficiency Standards over time; by 2030, all new non-residential construction will be required to achieve zero net GHG emissions. Additional examples can be found in the current draft scoping plan update.

Table 28 Annual GHG Emissions Reductions from Legislative and Regulatory Actions (MT CO2e/year)

<table>
<thead>
<tr>
<th>Reduction Source</th>
<th>Emissions Sector</th>
<th>Percent Reduction</th>
<th>Operational Emissions</th>
<th>Volume Reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Renewable Portfolio Standard</td>
<td>Energy</td>
<td>50.0¹</td>
<td>14,385.12</td>
<td>7,192.56</td>
</tr>
<tr>
<td>Title 24, Part 6, Building and Appliance Energy Efficiency</td>
<td>Energy</td>
<td>30.0</td>
<td>7,192.56²</td>
<td>2,157.76</td>
</tr>
<tr>
<td>Renewable Portfolio Standard</td>
<td>Water</td>
<td>50.0¹</td>
<td>1,766.31³</td>
<td>883.15</td>
</tr>
</tbody>
</table>

Total Reduction from Projected Volume 10,233.47

Source: EMC Planning Group 2017
Buildout GHG Effects

Table 29, Total Annual Unmitigated GHG Emissions shows the total net annual project GHG emissions after reductions from legislative and regulatory actions and existing baseline emissions are subtracted. The table also shows the percentage reduction from gross annual emissions that results from these reductions relative to the extrapolated reduction target for 2045. Though the extrapolated reduction target is not a threshold of significance per se, an additional approximately 63.7 percent reduction in the unmitigated emissions volume would be needed to move towards the reduction target. Given current GHG reduction frameworks, tools, and technologies, it is highly unlikely that this magnitude of reduction can be achieved without improvements in those tools and technologies. Therefore, for discussion and disclosure purposes the proposed project is assumed to have a significant impact from the generation of GHGs.

Table 29  Total Annual Unmitigated GHG Emissions (MT CO2e/year)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Unmitigated Emissions</td>
<td>139,085.52</td>
</tr>
<tr>
<td>Reductions from Projected Emissions</td>
<td></td>
</tr>
<tr>
<td>Legislative/Regulatory Reductions</td>
<td>(10,233.47)</td>
</tr>
<tr>
<td>Existing Baseline GHG Emissions</td>
<td>(1,917.00)</td>
</tr>
<tr>
<td>Subtotal Emissions Reductions</td>
<td>(12,150.47)</td>
</tr>
<tr>
<td>Net Annual GHG Emissions</td>
<td>126,935.05</td>
</tr>
<tr>
<td>Percent Reduction from Annual Unmitigated Emissions</td>
<td>8.3 percent</td>
</tr>
<tr>
<td>2045 Buildout Percent Reduction Target</td>
<td>72 percent</td>
</tr>
</tbody>
</table>

Source: CalEEMod, EMC Planning Group 2017

Deep reductions in GHG emissions will be required, including reductions from new development within the Target Areas, to move aggressively towards the interpolated 2045 emissions reduction target. Continued implementation of existing state regulatory requirements and implementation of new regulations anticipated over time are expected to contribute a substantial percentage of the emissions reductions required. Future technological solutions (e.g., improved batteries for storing sporadically-generated electricity from solar and wind sources) are also anticipated to play a major role in catalyzing emissions reductions. However, expectations
of local agencies to implement aggressive GHG reduction programs and actions that are within their control will continue to increase over time. The City intends to meet those expectations through implementation of programs and standards to be crafted for this purpose, including requiring individual land development and municipal projects to incorporate meaningful GHG reduction measures. Over time, the City's options for GHG reduction should increase, as new technologies come on line.

To lessen the significant GHG effect of the proposed project, the following mitigation measure is recommended. The mitigation measure would ensure that the City is demonstrating progress towards meeting post-2020 and post-2030 state GHG emissions reduction goals. This mitigation measure represents the most aggressive action the City has taken to date regarding GHG emissions reductions from land use development projects. The measure incorporates the recognition that the GHG emissions reduction landscape will change over time by requiring impacts of individual future development projects within the Target Areas to be assessed and mitigated through the CEQA process consistent with GHG reduction plans in effect at the time the individual projects are proposed.

**Mitigation Measure**

GHG-1. Until such time as the City adopts a greenhouse gas reduction plan pursuant to CEQA Guidelines section 15183(5)(b), Plans for the Reduction of Greenhouse Gas Emissions, developers of future individual projects within the Target Areas shall prepare a Greenhouse Gas Reduction Plan (GGRP). The GGRP shall serve as a project specific plan for the reduction of GHGs associated with individual projects. The GGRP shall include the following:

1) A GHG threshold of significance adopted by the City, if any, which is applicable on the date the project application is deemed complete by the City. If none has been adopted by the City, the GGRP shall include a GHG threshold of significance recommended by an appropriate agency such as the air district, or other regional or state agency which is acceptable to the City and applicable on the date the project application is deemed complete by the City. The threshold shall be based on substantial evidence that it is applicable to the proposed project.

2) Calculation of an unmitigated annual project GHG emissions projection using an acceptable modeling tool such as CalEEMod.

3) Calculation of GHG emissions reductions that accrue from applicable building standards and other adopted regulatory requirements in place on the date the project application is deemed complete by the City. These include regulatory requirements such as CALGreen, Pavley standards, Low Carbon Fuel Standard, Advanced Clean Cars, and other future applicable standards or regulatory requirements that may be
adopted by the state to implement AB 32 (2020), SB 32 (2030), other state regulations, or future state adopted legislation for reducing GHG emissions, including legislation and implementing regulations designed to achieve post-2030 emissions reduction targets, if any.

4) Calculation of net project GHG emissions volume after reductions are taken for applicable building standards and other adopted regulatory requirements. Determination whether the net emissions volume exceeds or is below the threshold of significance.

5) If the net emissions volume is above the applicable threshold of significance, the GGRP shall include feasible GHG reduction measures to be implemented to reduce total emissions to below the threshold of significance, if feasible. GHG reduction measures that are site-specific and under control of the applicant shall be prioritized. These could include, but may not be limited to, building and site energy reduction measures, measures to reduce project-generated vehicle miles traveled, or other measures. Off-site measures such as participation in a community-wide GHG reduction program(s), if any are adopted, or payment of GHG reduction fees (carbon offsets) into a qualified existing local program, if one is in place, may be considered after all feasible on-site reduction measures are considered. The effectiveness of the GHG reduction measures included in the GGRP must be verifiable based on evidence presented in the GGRP. Representative GHG reduction measures which may be considered may include, but are not limited to:

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

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

- Measures that support implementation of adopted state building guidelines and regulations in place on the date a project application is deemed complete by the City. These could include, but are not limited to: Tier 1 and Tier 2 building energy reduction measures included in CALGreen, provision of on-site vehicle charging stations or related infrastructure that supports state goals for transportation system electrification enumerated in SB 350, etc.
If sufficient feasible GHG reduction measures are unavailable to reduce GHG emissions to below the threshold of significance, the applicant shall include evidence in the GGRP to this effect. The GGRP shall be subject to review and approval of the Community Development Department prior to approval of the project specific entitlements.

Implementation of mitigation measure GHG-1 shall not be required if the City has a qualified GHG reduction plan in place on the date a future individual project application is deemed complete, the qualified GHG reduction plan reflects the most recent legislatively-adopted GHG reduction targets (e.g., the 2030 target set by SB 32), includes an inventory of projected GHG emissions from development within the Target Areas, and includes GHG reduction measures applicable to development within the Target Areas whose implementation is required as a condition of approval of such projects.

While mitigation measure GHG-1 would result in reduced GHGs, it is possible that individual projects may not achieve GHG reductions needed for their individual impacts to be less than significant such that the cumulative emissions from all such development would not meet the trajectory of reducing cumulative emissions to below the 2045 emissions reduction target. Therefore, the impact is considered to be significant and potentially unavoidable.

**IMPACT: CONFLICT WITH AN APPLICABLE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES (LESS THAN SIGNIFICANT WITH MITIGATION)**

As discussed in the Standards of Significance section above, to date, neither the City, nor any regional agency has prepared a qualified GHG reduction plan that is applicable to the proposed project. In light of the California Supreme Court’s recent decision in *Center for Biological Diversity v. California Department of Fish and Wildlife*, applicability of GHG reduction guidance provided in AB 32, SB 32 and the 2008, 2014, and draft 2017 scoping plans to individual, local land use development projects is also now uncertain. The City’s current General Plan does not contain policy adopted for the purpose of reducing GHG emissions, including GHG emissions from development within the Target Areas. Similarly, the EDE does not contain such policy.

As discussed in the Regulatory Setting section above, the GP SEIR is the only City document that provides specific direction for directly and indirectly reducing GHG emissions from land use development projects. The City considers the measures to be applicable to all development unless alternative mitigation from a subsequent environmental analysis is applied. The GP SEIR mitigation measures were developed over ten years ago when climate change policy and mitigation approaches were not yet well developed. Implementation of the mitigations would
reduce GHG emissions, but not as effectively as do current GHG reduction strategies, legislation, and regulations. The GHG analysis included in this section and the GHG reduction measures included in mitigation measure GHG-1 represent the subsequent environmental analysis and the alternative mitigation which the City considers to be valid for replacing the GHG mitigation measures included in the GP SEIR.

GHG reduction measures required pursuant to mitigation measure GHG-1 above are consistent with the intent of current and future statewide GHG reduction legislation and regulations, and with current and future expectations of local, regional, and state stakeholders regarding the City’s effort to reduce GHG emissions from new development. Implementation of mitigation measure GHG-1 would ensure that new development in the Target Areas is consistent with applicable GHG reduction plans that are in effect at the time individual project applications are deemed complete by the City. As a result, the significant impact would be reduced to less than significant.

3.6 Cultural Resources

This section of the EIR examines whether cultural resources (archaeological and historic resources) and paleontological resources are known to exist or have potential to exist within the Target Areas and whether development within these areas has potential to impact these resources.

Information in this section is derived from several sources including, but not limited to:

- Cultural Resources Assessment Report, Initial Study for the General Plan Amendment/Draft Economic Development Element, City of Salinas, Monterey County, California (WSA 2016) (cultural resources report); and


The cultural resources report documented findings of a cultural resources assessment performed by WSA, Inc. (WSA). WSA investigated conditions within the Target Areas. WSA conducted a records search for archeological resources, performed archaeological sensitivity modeling, and conducted a review of historical aerial maps. Pedestrian archaeological surveys were not conducted, but the future need for detailed surveys is discussed. For informational purposes only, WSA also conducted a records search to report conditions within the Economic Development Reserve Areas that are outlined as future strategy in the EDE. Since new development capacity is proposed only within the Target Areas, information associated with the Economic Development Reserve Areas does not bear on the analysis of cultural resources impacts included in this section of the EIR.
WSA contacted several local Native American tribal representatives by letter, on December 18, 2015, informing them of the proposed project. On January 17, 2016, the Ohlone/Costanoan-Esselen Nation responded to WSA in a letter that stated its concerns about potential impacts on cultural resources. The Ohlone/Costanoan-Esselen Nation requested that it receive relevant reports/surveys, that it be consulted on projects affecting its aboriginal homelands, and that a monitor be present during development occurring within its aboriginal territory. The Ohlone/Costanoan-Esselen Nation is the only tribe that requested notice of projects proposed within its aboriginal territory pursuant to AB 52. In response, the City conducted an AB 52 consultation with Louise Miranda-Ramirez on April 20, 2016. The Ohlone/Costanoan-Esselen Nation was also the only tribe that responded to the City's request for consultation pursuant to SB 18. This consultation was conducted on April 11, 2017. Summaries of the consultations are included in the Regulatory Setting section below.

Environmental Setting

Archaeological Setting and Ethnography

The following information is taken from the cultural resources report.

Archaeological Prehistory Setting. A number of archaeological investigations have been conducted in Salinas and in Monterey County. None of these has identified recorded prehistoric archaeological sites in the project area. Chronological data from area sites documents human occupation from 10,000 years ago to 150 years ago. Given the vast quantities of alluvium on the Salinas Valley floor, it is possible that many prehistoric sites lie deeply buried.

Lower Archaic/Millingstone Culture—10,000-5,000 B.P. (Before Present) The earliest evidence of area occupation dates from 10,000 B.P. to 8,500 B.P. A pre-5,000 B.P. occupation has been identified in the lowest occupation levels from a very few area sites. Small flake tools dominated the materials from these levels, along with milling equipment in the form of large hand stones and milling slabs. Several sites from this period that were to the west and closer to the coast were more reliant on marine resources and very few milling implements were present.

Early Period—5,000-2,750 B.P. The first well documented phase of occupation dates to 5,000-2,750 B.P. Like earlier assemblages, these lacked beads, ornaments and bone tools. Milling equipment was much more prevalent, as the use of mortars and pestles became significant during this period just as they did in Middle period sites in the Central Valley. Many sites west of the project area and closer to the coast that are known from this period where hunting, fishing and gathering have all been well documented.

Middle Period—2,750-1,450 B.P. The next distinct period of occupation has been observed at several area sites. Middle period components, including a house floor, have been identified. This
period shows a general decrease in artifact diversity, while artifact density remained roughly the same. Virtually all Middle Period sites that have been identified on the Monterey Peninsula are located on the coastline and show much greater reliance on marine resources.

**Late Period—1,450–150 B.P.** Post-1,450 B.P. occupations have been identified at sites in the project vicinity. Late period components are marked by the appearance of projectile points, bifaces, beads, ornaments and bone tools. During the Late Period, sites along the coastline show little change from their reliance on marine resources that typified the earlier period.

**Archaeological Ethnographic Setting.** The City is within the aboriginal territory of the Costanoans (from the Spanish Costanos for “coastal people”), who are also known today as the Ohlone. The Costanoans spoke a language now considered one of the major subdivisions of the Miwok-Costanoan, which belonged to the Utian family within the Penutian language stock. Costanoan designates a family of eight languages. Costanoan-speaking tribal groups occupied the area from the Pacific Coast to the Diablo Range and from San Francisco to Point Sur. Modern descendants of the Costanoan prefer to be known as Ohlone. The name Ohlone is derived from the Oljon group, which occupied the San Gregorio watershed in San Mateo County. The two terms (Costanoan and Ohlone) are used interchangeably in much of the ethnographic literature.

On the basis of linguistic evidence, it has been suggested that the ancestors of the Ohlone arrived in the San Francisco Bay area about 1,400 B.P., having moved south and west from the Sacramento-San Joaquin Delta. The ancestral Ohlone displaced speakers of a Hokan language and were probably the producers of the artifact assemblages that have been found on Late period sites. On the basis of archaeological evidence, the arrival of the Ohlone is estimated to be earlier, to about 4,500 B.P.

Although linguistically linked as a family, the eight Costanoan languages comprised a continuum in which neighboring groups could probably understand each other. However, beyond neighborhood boundaries, each group’s language was reportedly unrecognizable to the other. Each of the eight language groups was subdivided into smaller village complexes or tribal groups. The groups were independent political entities, each occupying specific territories defined by physiographic features. Each group controlled access to the natural resources of their territories, which also included one or more permanent villages and numerous smaller campsites used as needed during a seasonal round of resource exploitation.

The arrival of the Spanish led to a rapid and major reduction in the native populations. Diseases, declining birth rates, and the effects of the mission system served to disrupt aboriginal life ways (which are currently experiencing resurgence among Ohlone descendants). Brought into the missions, the surviving Ohlone were transformed from hunters and gatherers into agricultural
laborers. With Mexican independence in 1821 and the subsequent abandonment of the mission system, numerous ranchos were established. Generally, the few Indians who remained were then forced by necessity to work on the ranchos.

In the 1990s, some Ohlone groups (e.g., the Muwekma and Amah) submitted petitions for federal recognition. Many Ohlone are active in preserving and reviving elements of their traditional culture and actively consult on archaeological investigations.

Archaeological Sensitivity of Project Area

WSA performed archaeology sensitivity modeling that relies on soil type, slope, and distance to nearest water as the basis for calculating areas of high, medium, and low archaeological potential within the project area. As shown on Figure 14, Archaeological Sensitivity Map, the Target Areas are located on land with moderate to high and/or high sensitivity potential for buried archaeological resources. These sensitivity areas are primarily the result of their proximity to prehistoric wetlands and creeks that would have provided an abundant supply and variety of resources for food, shelter, clothing and tools.

Historic Resources Setting

Because of its rich past, Salinas includes a great number of historic resources. For centuries prior to the arrival of Spanish soldiers and missionaries, and the establishment of the Presidio at Monterey and missions at Carmel, San Antonio, Soledad, and San Juan Bautista, the Salinas area was home to the Ohlone Indians. The Salinan group and the Esselen group were found throughout what is today the larger Monterey County. Mission Soledad, located in the Salinas Valley, was founded in 1791. Missionization of the Salinan and Esselen groups, among others, led to the establishment of small settlements around the mission, the populations of which furnished labor for the mission’s various economic activities.

Although settlements existed around the Central Coast missions in the late 18th and early 19th centuries, the Salinas area remained largely undeveloped. Eight land grants were made in Monterey County during the era of Spanish rule. After Mexico seceded from Spain in 1822, larger numbers of ranchos were granted to settlers. The same year that Mexico seceded, a Custom House was built in Monterey and the Monterey harbor was open to foreign trade. In the 1850s, two ranchos, the 6,700-acre Rancho Nacional and the 10,000-acre Rancho Sausal, formed the nucleus of what is today the City of Salinas.

Named for a nearby salt marsh, Salinas has existed as a town since 1856. In 1872, "Salinas City" became the seat of Monterey County, coinciding with the arrival of the Southern Pacific Railroad. Two years later the name was changed to the "City of Salinas" and the community incorporated. The arrival of the railroad spurred growth in conjunction with the location of rail stations and solidified the travel corridors that continue to characterize the region.
Figure 14
Archaeological Sensitivity Map
Salinas Economic Development Element Program EIR

Like the Custom House before it, the rail line provided access to an expanded market for agricultural products and, coupled with mechanization, allowed grain production to expand in the 1870s and 1880s. Growing sugar beets for the huge mill at Spreckels (1899-1982) established large-scale irrigated agriculture. Dairies also became a major component of the valley’s economy in the first decades of the 20th century. During the 1920s, a major change in agriculture occurred with the introduction of lettuce and other row crops, including the artichoke.

Results of Cultural Resources Records Search

WSA implemented a records search which was conducted by the Northwest Information Center at Sonoma State University. The records search included a review of cultural resources and excavation reports and recorded cultural resources within a one-quarter mile radius of the Target Areas, for informational purposes, within the same radius of the Economic Development Reserve Areas, and within one-quarter mile on each side of the proposed expressway corridors. The records search also included a review of the Office of Historic Preservation’s “Directory of Historic Property Data File for Monterey County” and the California Inventory of Historic Resources.

A total of 21 cultural resources studies included some portion of the Target Areas. Only Target Area K has been subject to a pedestrian archaeological field survey.

The cultural resources records search indicated that no prehistoric archaeological resources have been recorded in the Target Areas. The records search indicated that two previously recorded cultural resources are located within the Target Area B at 296 El Camino Real South and 280 Abbott Street. Both of these resources are historic residences that have not been evaluated with regard to their eligibility for listing in the California Register of Historical Resources. To identify currently standing structures of historic date within Target Areas B, F, K, L2, N, and V, WSA reviewed County maps from the years 1877 and 1898, and USGS topographic maps for the Salinas quadrangle from the years 1912 and 1940. The results suggest that, within Target Areas B and K, historic-era structures likely still exist that have never been recorded.

The cultural resources report found that no human remains have been encountered or documented during previous cultural resources studies in the Target Areas.

Table 30, Summary of Historic and Prehistoric Resources Findings for Target Areas, summarizes results of the cultural resources assessment records search, archaeological sensitivity analysis, and historic map review for each Target Area.

Paleontological Resources Setting

As described in County General Plan Draft EIR section 4.10.2.3, Paleontological Resources, significant paleontological resources are fossils or assemblages of fossils that are unique,
3.0 Environmental Setting, Impacts and Mitigation Measures

unusual, rare, uncommon, and diagnostically or stratigraphically important, and those that add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally. They include fossil remains of large to very small aquatic and terrestrial vertebrates, remains of plants and animals previously not represented in certain portions of the stratigraphy, and assemblages of fossils that might aid stratigraphic correlations—particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, paleoclimatology, and the relationships of aquatic and terrestrial species. Most of the fossils found in Monterey County are of marine life forms, and create a record of the region’s geologic history of advancing and retreating sea levels.

Table 30 Summary of Historic and Prehistoric Resources Findings for Target Areas

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Records Search Result¹</th>
<th>Historic Map Review Result¹</th>
<th>Archaeological Sensitivity (See Figure 14)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B</td>
<td>Historic Residences</td>
<td>Historic-era structures may exist that have never been recorded</td>
<td>Moderate to High</td>
</tr>
<tr>
<td>F</td>
<td>No cultural resources</td>
<td>No historical structures</td>
<td>High</td>
</tr>
<tr>
<td>N</td>
<td>No cultural resources</td>
<td>No historical structures</td>
<td>Moderate to High</td>
</tr>
<tr>
<td>L2</td>
<td>No cultural resources</td>
<td>No historical structures</td>
<td>High</td>
</tr>
<tr>
<td>K</td>
<td>No cultural resources</td>
<td>Historic-era structures may exist that have never been recorded</td>
<td>Moderate to High</td>
</tr>
<tr>
<td>V</td>
<td>Historic Site</td>
<td>No historical structures</td>
<td>Moderate to High</td>
</tr>
</tbody>
</table>

Source: WSA 2016

Note: ¹Findings of no pre-historic or historic cultural resources do not indicate with certainty that such resources do not exist within the Target Areas. Additional archaeological surveys may be required in the future to confirm whether pre-historic or historic cultural resources are present in these areas.

Fossils are found throughout the County because of the widespread distribution of marine deposits. Twelve fossil sites have been identified as having outstanding scientific value. The general locations of these sites are illustrated on Exhibit 4.10.1, Paleontological Resources, of the Monterey County General Plan Draft EIR. None of these sites is located in the vicinity of the Target Areas.

A search of the University of California Museum of Paleontology Paleontological Collections Database for Merced County (http://ucmpdb.berkeley.edu) revealed that most of the known fossil localities are within one of several types of geologic formations. These include, but are not limited to: Monterey, Meganos, Vaqueros, Etchegoin, Santa Margarita, and Pancho Rico. These formations are generally several million years old.
The agricultural soils in the Salinas Valley on which the City is located are generally formed on deep alluvium, which consist of soils deposited on the valley floor over millions of years due to erosion of uplands on both sides of the Salinas Valley. According to the California Geological Survey’s Geologic Atlas of California – Santa Cruz sheet, the geological formations in which the Target Areas are located consist either of Alluvium or River Terrace Deposits geologic units (http://www.quake.ca.gov/gmaps/GAM/santacruz/santacruz.html). The alluvium formation is generally found north, south, and east of U.S. Highway 101 within the city of Salinas. The River Terrace Deposit units are largely found in the northern to central portion of Salinas and adjacent to the hillsides located east of Salinas. The alluvium and river terrace deposits that comprise these units were recently deposited – likely in the last 10,000 years. To be considered a fossil, an object generally must be more than 10,000 years old. As noted above, most fossils recorded in Monterey County to date have been found in geologic formations that are millions of years old. Consequently, it is unlikely that fossils would be found during excavations or other related construction activities associated with development within Target Areas.

**Regulatory Setting**

**Archaeological and Historical Resources**

**Federal National Historic Preservation Act**

Federal regulations for cultural resources are primarily governed by Section 106 of the National Historic Preservation Act of 1966, which applies to actions taken by federal agencies, such as approval of section 404 permits for fill of wetlands. The National Register of Historic Places was established to recognize resources associated with the accomplishments of all peoples who have contributed to the country's history and heritage. Guidelines were designed for federal and state agencies in nominating cultural resources to the national register. These guidelines are based upon integrity and significance of the resource. Integrity applies to specific items such as location, design, setting, materials, workmanship, feeling, and association.

Integrity is defined in Bulletin 15: How to Apply the National Register Criteria for Evaluation, (U.S. Department of the Interior, National Park Service 1982) as: “The authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic or prehistoric period. If a property retains the physical characteristics it possessed in the past then it has the capacity to convey association with historical patterns or persons, architectural or engineering design and technology, or information about a culture or peoples.
Quality of significance in American history, architecture, archaeology, engineering and culture is present in resources that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and the resources meet at least one of the following criteria:

a. are associated with events that have made a significant contribution to broad patterns of our history;

b. are associated with the lives of persons significant in our past;

c. embody distinctive characteristics of type, period, or method of construction, or that represent the work of master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and

d. have yielded, or are likely to yield, information important in prehistory or history.”

**California Historic Resource Criteria**

A cultural resource is considered “significant” if it qualifies as eligible for listing in the CRHR. Properties that are eligible for listing in the CRHR must meet one or more of the following criteria:

a. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;

b. Associated with the lives of persons important to local, California or national history;

c. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; and/or

d. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

(Pub. Resources Code, § 5024.1.)

A property may be automatically listed in the California Register of Historic Places if it is formally determined eligible for the National Register of Historic Places. Properties that are formally determined eligible for the National Register of Historic Places are designated as such through one of the federal preservation programs administered by the California Office of Historic Preservation.

The California Register of Historic Places interprets the integrity of a cultural resource based upon its physical authenticity. A historic cultural resource must retain its historic character or appearance and thus be recognizable as a historic resource. Integrity is evaluated by examining the subject’s location, design, setting, materials, workmanship, feeling, and association. If the
subject has retained these qualities, it may be said to have integrity. It is possible that a cultural resource may not retain sufficient integrity to be listed in the National Register of Historic Places yet still be eligible for listing in the California Register of Historic Places. If a cultural resource retains the potential to convey significant historical/scientific data, it may be said to retain sufficient integrity for potential listing in the California Register of Historic Resources.

**California Environmental Quality Act Guidelines Section 15064.5**

Under CEQA, public agencies must consider the effects of their actions on both “unique archaeological resources” and “historical resources.” Both categories of cultural resources are addressed in CEQA Guidelines section 15064.5, which reflects two different statutes aimed at the two broad categories of resources. (See Pub. Resources Code, §§ 21083.2, 21084.1) Although “historical resource” is a broad category that includes buildings, the concept also includes archaeological resources, creating a potential that a particular archaeological resource might be (i) a unique archaeological resource, (ii) an historical resource, (iii) both, or (iv) neither. CEQA Guidelines section 15064.5, subdivision (b), provides guidance on how to deal with archaeological resources that might qualify under either of these two statutory categories.

**Unique Archaeological Resources.** Public Resources Code section 21083.2 requires agencies to determine whether proposed projects would have effects on “unique archaeological resources,” and instructs agencies, in preparing EIRs, to disregard impacts on “nonunique archaeological resources.” A “unique archaeological resource” is defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; 2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person (Public Resources Code, § 21083.2, subd. (g).) A “nonunique archaeological resource” is “an archaeological artifact, object, or site which does not meet the[s] criteria[.]” (Id., subd. (h).)

Treatment options under Section 21083.2 include activities that preserve such resources in place in an undisturbed state. Other acceptable methods of mitigation under Section 21083.2 include excavation and curation or study in place without excavation and curation.

**Historical Resources.** Public Resources Code section 21084.1 and CEQA Guidelines Section 15064.5, subdivision (a)(i), defines a historical resource as, among other things, a resource listed or eligible for listing on the California Register of Historical Resources. In addition, a resource is presumed to constitute an historical resource if it is included in a local register of historical resources unless the preponderance of evidence demonstrates that it is not historically or
cultiually significant (CEQA Guidelines, § (a)(2).) Finally, a resource should be considered “historical” if the lead agency determines that the resource “meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.”

(CEQA Guidelines, § 15964.5, subd. (a)(3).)

In addition to defining historical resources, Public Resources Code section 21084.1 provides that a “project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” In other words, a significant effect to an “historical resource” occurs where a proposed project would cause “a substantial adverse change in the significance” of such a resource.

Guidelines section 15064.5, subdivision (b)(1), defines the phrase “substantial adverse change,” as used in this context, as meaning “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” In turn, subdivision (b)(2) states that an historic resource is “materially impaired” when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in” either, the California Register of Historic Resources, a local register of historic resources, or a historical resources survey.

State CEQA Guidelines Section 15126.4, subdivision (b), sets forth principles relevant to means of mitigating impacts on historical resources. It provides as follows:

(1) Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project’s impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.
(2) In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur.

(3) Public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

(A) Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.

(B) Preservation in place may be accomplished by, but is not limited to, the following:

1. Planning construction to avoid archaeological sites;

2. Incorporation of sites within parks, greenspace, or other open space;

3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site.

4. Deeding the site into a permanent conservation easement.

(C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code. If an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation.

(D) Data recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center.

Section 15064.5, subdivision (f), deals with potential discoveries of cultural resources during project construction. That provision states that, “[a]s part of the objectives, criteria, and
procedures required by Section 21082 of the Public Resources Code, a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction. These provisions should include an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue on other parts of the building site while historical or unique archaeological resource mitigation takes place.”

Subdivision (e) of section 15064.5 requires that excavation activities be stopped whenever human remains are uncovered and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are those of Native Americans, the Native American Heritage Commission must be contacted within 24 hours. At that time, the lead agency must consult with the appropriate Native Americans, if any, as identified in a timely manner by the Native American Heritage Commission. Section 15064.5 of the State CEQA Guidelines directs the lead agency (or applicant), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains.

**California Assembly Bill 52 – Protection of Tribal Cultural Resources.** On September 25, 2014, Governor Brown signed Assembly Bill (AB) 52, which creates a new category of environmental resources “tribal cultural resources” that must be considered under CEQA. The legislation imposes new requirements for consultation regarding projects that may affect a tribal cultural resource, includes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures.

AB 52 and CEQA section 21080.3.1 require lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area.

The Ohlone/Costanoan-Esselen Nation is the only tribe that has requested notice of projects proposed within its aboriginal territory pursuant to AB 52. Consequently, the City provided notice of the proposed project to the tribe’s Native American representative Louise Miranda-Ramirez in December 2015. The City then conducted a consultation with Louise Miranda-Ramirez on April 20, 2016. Topics discussed included the proposed project description, the findings of the cultural resources report, Louise Miranda-Ramirez’s knowledge of any known or potential artifacts in the area (none were known to her), and the possibility of creating a memorandum of understanding with property owners that calls for conveyance of any artifacts found on their properties to the Ohlone/Costanoan-Esselen Nation.

**Additional Native American Consultation Conducted.** WSA contacted the Native American Heritage Commission and eleven local Native American tribal representatives through correspondence and/or phone calls. No places, features or objects were identified within the Target Areas. However, Native American representatives Louise Miranda-Ramirez of the
Ohlone/Costanoan-Esselen Nation, and Ann Marie Sayers of the Indian Canyon Mutsun Band of Costanoan requested that culturally sensitive materials remain undisturbed, and that a Native American monitor be present during any ground disturbance in tribal or culturally sensitive areas. The City also conducted a consultation with Louise Miranda-Ramirez on June 30, 2016. Topics discussed included the proposed project description, the findings of the cultural resources report, Louise Miranda-Ramirez’s knowledge of any known or potential artifacts in the area (none were known to her), and the possibility of creating a memorandum of understanding with property owners that calls for conveyance of any artifacts found on their properties to the Ohlone/Costanoan-Esselen Nation.

**California Senate Bill 18 – Tribal Consultation**

California Senate Bill (SB) 18 was adopted in 2005. Its purpose is to increase tribal involvement in state planning. In short, SB 18 states:

Prior to the adoption or any amendment of a city or county’s general plan, proposed on or after March 1, 2005, the city or county shall conduct consultations with California Native American tribes that are on the contact list maintained by the Native American Heritage Commission for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.995 of the Public Resources Code that are located within the city or county’s jurisdiction.

SB 18 establishes a process to be followed by lead agencies for consulting with Native American Tribes and for considering the input received as part of the CEQA process for identifying and mitigating impacts on protected places, features and objects. Because the proposed project is a general plan amendment, the City conducted SB 18 consultation.

The Ohlone/Costanoan-Esselen Nation is the only tribe that responded to the City’s SB 18 consultation letter, which was sent on March 13, 2017. The City consulted with Louise Miranda-Ramirez on April 11, 2017. Topics discussed were similar to those raised by the tribe in its prior AB 52 consultation as described above.

**Local Plans and Regulations**

**City of Salinas General Plan.** The General Plan contains one policy regarding archaeological resources:

**COS-4.4: Protect significant archaeological resources in accordance with the California Environmental Quality Act.**
State Regulations Regarding Paleontological Resources

Several state laws protect paleontological resources on state lands as well as projects undertaken by state agencies. A summary of these laws follows:

California Environmental Quality Act. CEQA is the primary California state environmental law protecting fossils. Appendix G of the CEQA Guidelines provides an Environmental Checklist of questions that a lead agency should normally address if relevant to a project’s environmental impacts. One of the questions to be answered in this Environmental Checklist (CCR Section 15063; Appendix G, Section V, c) is the following: “Would the project directly or indirectly destroy a unique paleontological resource or site...?”

CEQA Guidelines Section XVII.a, of the Environmental Checklist asks a second question equally applicable to paleontological resources: “Does the project have the potential to . . . eliminate important examples of the major periods of California history or pre-history?” Fossils are important examples of the major periods of California prehistory. To be in compliance with CEQA, environmental impact assessments, statements, and reports must answer both these questions in the Environmental Checklist.

Other state requirements for paleontological resource management are in California Public Resources Code section 5097.5, entitled Archaeological, Paleontological, and Historical Sites. This statute defines any unauthorized disturbance or removal of a fossil site or fossil remains on public land as a misdemeanor, and specifies that state agencies may undertake surveys, excavations, or other operations as necessary on publicly owned lands to preserve or record paleontological resources.

Public Resources Code Section 5097.5. California PRC Section 5097.5 prohibits excavation or removal of any “vertebrate paleontological site, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands and specifies that state agencies may undertake surveys, excavations, or other operations as necessary on publicly owned lands to preserve or record paleontological resources.” Public lands are defined to include lands owned by or under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Section 5097.5 states that any unauthorized disturbance or removal of archaeological, historical, or paleontological materials or sites located on public lands is a misdemeanor. Section 30244 requires reasonable mitigation for impacts on paleontological resources where development might adversely impact paleontological resources, as identified by the State Historic Preservation Officer.

Standards of Significance

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of cultural resources, as it does on a whole series of...
additional environmental topics. Notably, lead agencies are under no obligation to use the vast majority of these inquiries in fashioning thresholds of significance. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here, though it has no discretion with respect to one particular threshold: the one applicable to “historical resources.” As noted earlier, Public Resources Code section 21084.1 and CEQA Guidelines section 15064.5, subdivision (b), require an agency to find a significant effect where a proposed project would cause a substantial adverse change in the significance of an historical resource.

In addition, the City has exercised its discretion to modify one of the checklist inquiries so that it does not address generic “archaeological resources” but instead focuses on “unique archaeological resources.”

Furthermore, despite the considerable discretion agencies normally enjoy in fashioning significance thresholds, there are some thresholds that must, as a matter of law, be used by public agencies. One of these relates (if only impliedly) to paleontological resources, and is found in CEQA Guidelines section 15065 (“Mandatory Findings of Significance”).

In light of the foregoing, the proposed project would cause a significant effect on cultural resources if it would:

- Cause a substantial adverse change in the significance of an historical resource as defined in section 15064.5;
- Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to section 15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;
- Eliminate important examples of the major periods of California history or prehistory; or
- Disturb any human remains, including those interred outside of formal cemeteries.

**Analysis, Impacts, and Mitigation**

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.
**IMPACT: POTENTIAL FOR CONSTRUCTION ACTIVITIES SUCH AS EXCAVATIONS, GRADING, OR TRENCHING ASSOCIATED WITH DEVELOPMENT WITHIN THE TARGET AREAS TO ADVERSELY AFFECT HISTORICAL RESOURCES (LESS THAN SIGNIFICANT WITH MITIGATION)**

As described in the Environmental Setting section above, the records search identified two historic residences located in Target Area B that have not been evaluated with regard to their eligibility for listing in the California Register of Historical Resources. Results of the historical map review indicate that historic-era structures exist in the Target Areas B and K that have never been recorded. Although historic structures were not identified in the remaining Target Areas additional historical structures may be present. Modifying or removing significant historic structures, i.e., structures listed or eligible for listing, is a significant impact.

Implementation of the following mitigation measure would ensure that impacts to significant historical resources, if present, from development within Target Areas, would be reduced to less than significant.

**Mitigation Measure**

CR-1. Developers of individual projects within Target Areas shall retain a qualified historic resources consultant to conduct an historic resources inventory and may be required to perform site specific surveys, based on the probability and likelihood of the existence of historical remains, to determine if significant historical resources are present within proposed individual project sites. Guidelines established by the California State Office of Historic Preservation shall be used to record resources. If significant historic resources are present, the project developer shall preserve the significant historic resource or implement mitigation measures identified by the historic resources consultant. Mitigations shall be reviewed and approved by the Community Development Director and mitigations shall be implemented and completed prior to approval of a grading permit, unless otherwise directed by the Community Development Director.

**IMPACT: CONSTRUCTION ACTIVITIES SUCH AS EXCAVATIONS, GRADING, OR TRENCHING ASSOCIATED WITH FUTURE DEVELOPMENT WITHIN THE TARGET AREAS COULD UNCOVER AND DAMAGE BURIED ARCHAEOLOGICAL RESOURCES IF PRESENT (LESS THAN SIGNIFICANT WITH MITIGATION)**

The records search did not identify documentation of unique archaeological resources within the Target Areas. However, the results of the archaeological sensitivity modeling indicate all Target Areas have moderate to high or high sensitivity for presence of surface or buried archaeological
resources. Some of these could turn out to be “unique.” Ground disturbance and subsurface excavations associated with future development within these areas could uncover and damage archaeological resources if present. Damage to such resources could be a significant impact.

Implementation of the following mitigation measure would reduce impacts on unknown but potentially present and significant archaeological resources to less than significant.

**Mitigation Measure**

CR-2. During the CEQA review process for individual future projects within the Target Areas, archaeological surveys shall be conducted to determine whether any unique archaeological resources or subsurface historic resources are present. Intensive pedestrian surveys should be conducted, and if possible, during a time of the year when ground visibility is optimal (e.g. after plowing of agricultural fields).

CR-3. The following language shall be included in any permit associated with earth moving activities for development projects proposed within Target Areas:

In the event that unique archaeological resources or historical resources are uncovered during excavation and/or grading, all work shall stop in the area of the subject property until an appropriate data recovery program can be developed and implemented by a qualified archaeologist. The Community Development Director shall ensure that the permit language has been included and shall ensure that the appropriate data recovery program is implemented should unique archaeological resources or historical resources be uncovered.

**IMPACT: DESTRUCTION OR LOSS OF PALEONTOLOGICAL RESOURCES FROM GROUND DISTURBING DEVELOPMENT ACTIVITIES FOR FUTURE DEVELOPMENT WITHIN TARGET AREAS (LESS THAN SIGNIFICANT WITH MITIGATION)**

As described in the Environmental Setting section above, fossils are found throughout Monterey County because of the widespread distribution of marine deposits. Twelve fossil sites have been identified as having outstanding scientific value within Monterey County. None of these sites is located in the vicinity of the Target Areas. Although the geologic formations present in these areas are not likely to contain fossils of significant scientific value, paleontological resources could nevertheless be present. Impacts to paleontological resources could result from grading, excavations, and other ground disturbing activities.

Implementation of the following mitigation measure would ensure that impacts on potentially present paleontological resources would be reduced to less than significant.
Mitigation Measure

CR-4. The following language shall be included in any permit associated with earth moving activities for development projects proposed within Target Areas:

In the event that paleontological resources are uncovered during excavation and/or grading, all work shall stop in the area of the subject property until a qualified paleontologist can assess the scientific significance of the paleontological resources and, if they are significant, until an appropriate data recovery program can be developed and implemented. The Community Development Director shall ensure that the permit language has been included and shall ensure that the appropriate data recovery program is implemented if significant paleontological resources are uncovered.

IMPACT: POTENTIAL FOR DISTURBANCE OF UNKNOWN HUMAN REMAINS FROM CONSTRUCTION ACTIVITIES INCLUDING GRADING AND EXCAVATIONS WITHIN THE TARGET AREAS (LESS THAN SIGNIFICANT WITH MITIGATION)

The cultural resources report concluded that no human remains have been encountered or documented within the Target Areas. Nevertheless, the potential exists that human remains could be disturbed if present. The impact of disturbing these remains would be significant.

Implementation of the following mitigation measure would reduce this impact to a less-than-significant level by requiring appropriate treatment of human remains if uncovered during construction activities.

Mitigation Measure

CR-5. If human remains are found during construction within the Target Areas, there shall be no further excavation or disturbance of the construction site or any nearby area reasonably suspected to overlie adjacent human remains until an archeological monitor and the coroner of Monterey County are contacted. If it is determined that the remains are Native American, the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD may then make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and associated grave goods as provided in Public Resources Code section 5097.98. The landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance if: a) the Native American Heritage
Commission is unable to identify a MLD or the MLD failed to make a recommendation within 24 hours after being notified by the commission; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

### 3.7 Geology and Soils

This section of the EIR includes evaluation of geologic and soils conditions within the Target Areas and evaluation of the potential risks to public safety and future development from seismic hazards.

Information is this section is primarily derived from the following sources:

- *City of Salinas General Plan Draft Environmental Impact Report* (Cotton/Bridges/Associates 2002); and

No comments on geology or soils issues were received on the NOP.

#### Environmental Setting

#### Regional Geology

Monterey County lies within the California Coast Ranges geomorphic and physiographic province, a region dominated by active tectonics astride the margin between the Pacific and North American tectonic plates. Over time, these forces have created the varied mountainous, valley, and fault-bound blocks seen in Monterey County today. During the Miocene Epoch (five to 24 million years ago), the Pacific and North American plates shifted the direction of their major movement relative to one another, and instead of a convergent margin, the plate boundary became a transform boundary with lateral movement similar to that occurring along the present-day San Andreas Fault system. Movement along the ancient fault system caused the Salinian rocks to be carried northward—after undergoing folding and intrusion by granitic rocks. Thus, the two major rock types underlying Monterey County, the Salinian and Franciscan, both were created as a result of interaction between the Pacific and North American plates. Plate motion continues today and is manifested along the County's various fault systems. Two faults considered active with evidence of historic or recent movement are the San Andreas Fault and the San Gregorio Fault, which form the eastern and western boundaries of the Salinian block.
Tectonic movement in the region has resulted in a variety of active fault types. Uplift along faults is largely responsible for the formation of the Coast Ranges, including the Santa Lucia Range and the Gabilan Range.

Rapid erosion and deposition of soil from the uplifted mountains formed broad alluvial fans of well-drained, nutrient-rich soil. This process occurred over several tens of millions of years. During the Pleistocene era, the sea level fluctuated repeatedly in response to climate changes that formed glaciers in other parts of the world. As the sea level changed, marine sediments were deposited beneath what later became the floor of the Salinas Valley.

**Local Geology**

Salinas is located in northern Monterey County between the Gabilan and Santa Lucia mountain ranges. The relatively flat topography and geologic setting of Salinas offer few geologic hazards, other than those related to seismic activity.

Most of the City has slopes of one to 10 percent, although a few areas have slopes from 10 to 30 percent. To the east of the City, topography becomes more varied, as slopes increase toward the Gabilan Mountains. Northeast of the City, slopes from 10 to 30 percent are common. Generally, areas of low and moderate slopes reflect few soil constraints for development and road and street construction. Some localized soils constraints related to clay and steeper slopes may occur within the City and surrounding area.

**Seismicity**

Salinas lies within a region with active seismic faults, and is therefore subject to risk of hazards associated with earthquakes. Seismic activity poses two types of hazards: primary and secondary. Primary hazards include ground rupture, ground shaking, ground displacement, and subsidence and uplift from earth movement. Primary hazards can induce secondary hazards including ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (tsunamis and seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires.

**Faults.** A fault is defined as a planar or gently curving fracture in the earth’s crust along which there has been relative displacement. Movement within a fault causes an earthquake. Generally, earthquakes are associated with faults exposed at the earth’s surface. A fault is considered “active” if it has had surface displacement within the last 11,000 years or is included in an Alquist-Priolo Earthquake Fault Zone (described in the Regulatory Setting section below), as established by the State Division of Mines and Geology. A fault is considered “potentially active” if it has experienced movement within Quaternary time (1.6 million years before the present). Faults that have not moved within the last 1.6 million years are generally considered inactive.
As described in the Regulatory Setting section below, areas located within Alquist-Priolo Earthquake Fault Zones are those most susceptible to surface rupture due to movement of a fault. The greatest seismic threat and nearest Alquist-Priolo Earthquake Fault Zones are associated with the San Andreas and Calaveras faults, which are located 15 to 20 miles to the east and northeast of Salinas. No known active faults are located in the City or adjacent areas and no Alquist-Priolo Earthquake Fault Zoning has been established by the State of California in these areas. Consequently, there is no potential for ground rupture within the Target Areas.

Ground Shaking. When movement occurs along a fault, the energy generated is released as waves which cause ground shaking. Ground shaking intensity varies with the magnitude of the earthquake, the distance from the epicenter, and the type of rock sediment through which the seismic waves move. The geological characteristics of an area thus can be a greater influence on ground shaking intensity than its distance to the earthquake epicenter. The most serious direct earthquake hazard is damage to or collapse of buildings and other structures caused by ground shaking.

Salinas lies within a region with active seismic faults, and is therefore subject to risk of hazards associated with earthquakes. Although the potentially active King City and Gabilan Creek Faults (active within the last three million years, though not the last 11,000 years) are located within the City’s General Plan planning area, they are not expected to generate seismic activity. The greatest seismic threat is related to the San Andreas and Calaveras Faults. All of Salinas is in Seismic Risk Zone IV, the highest potential risk category due to the frequency and magnitude of earthquake activity nationwide as determined in the most recently adopted Uniform Building Code. Seismic hazard zones are a further-refined measurement, based largely on the type of ground material, but also reflect other geologic factors.

Ground Failure

Ground-surface disturbance or ground failure is a phenomenon associated with seismic shaking. Ground failure can occur as a result of subsidence, liquefaction, lateral ground spreading or displacement, sand boils, small ground fissures. Of these, liquefaction may be the primary potential source of ground failure within the Salinas area.

Liquefaction. Liquefaction occurs primarily in areas of recently deposited sands and silts and in areas of high groundwater levels and involves a sudden loss in strength of a saturated, cohesionless soil caused by shock or strain, such as ground shaking, and resulting in the temporary transformation of the soil into a fluid mass. If the liquefying layer is near the surface, the effects are much like that of quicksand. Liquefaction typically occurs in areas where groundwater is less than 30 feet below the surface, and where the soils are composed predominantly of poorly consolidated fine sand. Especially susceptible areas include sloughs and marshes that have been filled in and covered with development. Salinas has several former
wetland areas that have been “reclaimed” (drained and filled) and developed. In addition, Salinas rests on almost 1,800 feet of alluvium. Liquefaction potential is commonly investigated on a site-specific basis through analysis of subsurface soils and groundwater conditions.

**Slope Failure.** As noted previously, within most of the General Plan planning area, slopes range from one to ten percent. The Target Areas are generally located on relatively level land for which no potential for landslide or slope failure is likely to exist either during a seismic event or independent of a seismic event.

**Tsunami and Seiches.** Tsunami and seiches can occur as the result of large earthquakes. The City is protected from tsunami or sea waves due to its inland location. A seasonal wetland at Upper Carr Lake Basin within which Target Area V is located may be subject to oscillation, or seiches, during earthquakes. The hazard is dependent upon specific earthquake parameters, and the degree of damage due to seiches is likely to be minor in the Upper Carr Lake Basin area.

**Subsidence**

Subsidence is the gradual lowering of the ground surface with little or no horizontal motion. Subsidence results from settlement over small or large areas as the consequence of compaction or loss of subsurface materials. The exception is tectonic subsidence, which occurs suddenly and is the compaction of soils due to ground shaking during earthquakes. Subsidence is usually the result of groundwater, gas or oil extraction, and hydro-compaction or the oxidation of organic soils. According to the County General Plan Draft EIR, there is little documentation of widespread subsidence in Monterey County. Information presented in the California Department of Water Resources 2014 report titled, *Summary of Recent, Historical, and Estimated Potential for Future Land Subsidence in California*, supports the County General Plan Draft EIR findings that there is insufficient data regarding land subsidence for the Salinas Valley groundwater basin (California Department of Water Resources 2014).

**Soils**

Soils within the Target Areas are generally characterized as loam, sandy loam, clay loam, and gravelly loam. The soils within Target Area V are predominately clay. Numerous soil types in total are found within the Target Areas based on a U.S. Department of Agriculture Natural Resource Conservation Service Web Soil Survey conducted for the proposed project. Table 31, *Soils Engineering Characteristics*, shows the more prevalent soil types and their engineering characteristics that are relevant to analysis of the soils related impacts of the proposed project.

**Erosion.** Erosion is a natural process caused by wind, water, or gravitational forces, which can result in soil removal or erosion of soil from a site. The primary geological effects of erosion are loss of topsoil, rut formation, and potential destabilization of slopes. Subsequent deposition to another site is sedimentation. The potential for erosion within the Target Areas varies from low
to high based on the “T Factor”. The "T factor" is the soil loss tolerance (in tons per acre). It is defined as the maximum amount of erosion at which the quality of a soil as a medium for plant growth can be maintained. The T factors are integer values of from 1 through 5 tons per acre per year. The factor of 1 ton per acre per year is for shallow or otherwise fragile soils and 5 tons per acre per year is for deep soils that are least subject to damage by erosion.

### Table 31 Soils Engineering Characteristics

<table>
<thead>
<tr>
<th>Soil Series or Type</th>
<th>Erosion Potential (T Factor)</th>
<th>Shrink-Swell Potential</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antioch very fine sandy loam: AeA: 0 to 2 percent slopes, AeC: 2 to 9 percent slopes</td>
<td>2</td>
<td>Low to High</td>
</tr>
<tr>
<td>Arroyo Seco gravelly loam: AvA: 0 to 2 percent slopes, AvB: 2 to 5 percent slopes</td>
<td>5</td>
<td>Low</td>
</tr>
<tr>
<td>Chualar loam: CbA: 0 to 2 percent slopes, CbB: 2 to 5 percent slopes, CbC: 5 to 9 percent slopes</td>
<td>3</td>
<td>Low to Moderate</td>
</tr>
<tr>
<td>Clear Lake clay: Cf: 0 to 1 percent slopes, frequently flooded; Cg: sandy substratum, drained, 0 to 1 percent slopes</td>
<td>5</td>
<td>Low to High</td>
</tr>
<tr>
<td>Elder sandy loam: EaA: 0 to 2 percent slopes</td>
<td>5</td>
<td>Low</td>
</tr>
<tr>
<td>Gorgonio sandy loam: GkB: 0 to 5 percent slopes</td>
<td>5</td>
<td>Low</td>
</tr>
<tr>
<td>Placentia sandy loam: PnA: 0 to 2 percent slopes, PnC: 2 to 9 percent slopes</td>
<td>1</td>
<td>Low to High</td>
</tr>
<tr>
<td>Salinas loam: SaA: 0 to 2 percent slopes, Salinas clay loam SbA: 0 to 2 percent slopes</td>
<td>5</td>
<td>Low to Moderate</td>
</tr>
<tr>
<td>Santa Ynez fine sandy loam: ShC: 2 to 9 percent slopes, ShD: 9 to 15 percent slopes, ShE: 15 to 30 percent slopes</td>
<td>1</td>
<td>Low to High</td>
</tr>
<tr>
<td>Xerorthents: Xb: sandy, Xc: loamy, Xd: dissected</td>
<td>N/A</td>
<td>Low to Moderate</td>
</tr>
</tbody>
</table>


**Notes:** ¹Only the most prevalent soil types within the Target Areas are shown.
Most of soils in the Target Areas have minimal to moderate soil erosion potential based on their having a “T Factor” of 3, 4, or 5. Less than 15 percent of the soils within the EOAs as a whole have a “T Factor” of 1 or 2, which indicate a higher susceptibility to erosion.

**Expansive Soils.** Expansive soils are susceptible to shrinking and swelling as moisture content changes. Expansive soils swell when wet and shrink when dry, which can damage buildings, roads, and underground utilities that are not designed to protect against this soil movement. Clay soils are especially prone to shrink or swell due to their high water holding capacity and elastic qualities. The effects of expansive soils can be mitigated through proper design, selection of materials, and site preparation. Depending on site conditions and the nature of a project, a variety of approaches may be used, including over excavation and replacement of native soils with non-expansive fills, amendment and on-site use of native soils, and implementation of specialized foundation designs.

Many of the soils have a clay component, which is an indicator of shrink-swell potential. The expansiveness of the primary soils within these areas ranges from low to high, with a portion of the variability contingent on the depth at which expansiveness characteristics are evaluated (U.S. Department of Agriculture 1978). Areas where clay and sandy loam are present are classified as high shrink-swell potential at certain depths.

**Regulatory Setting**

**State**

**California and Uniform Building Codes.** The California Building Code (Title 24 of the California Code of Regulations)(CBC) and the Uniform Building Code provide standards for testing and building construction as well as safety measures for development within earthquake prone areas. The City is located within Seismic Risk Zone 4, which is expected to experience the greatest effects from earthquakes, and which requires the most stringent standards for seismic design. The code standards are enforced by local building officials at the project design stage.

Where no other building codes apply, Chapter 18 of the CBC regulates soils and foundations. The CBC also applies to building design and construction in the state and is based on the federal International Building Code (IBC) used widely throughout the country (generally adopted on a state-by-state or district-by-district basis). The CBC has been modified for California conditions with numerous more detailed and/or more stringent regulations.

The State earthquake protection law (California Health and Safety Code Section 19100 et seq.) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. Specific minimum seismic safety and structural design requirements are set forth in Chapter 16 of the CBC. The CBC identifies seismic factors that must be considered in structural design.
Chapter 18 of the CBC regulates soils and foundations, and regulates the preparation of a preliminary soil report, geohazard report, and geotechnical reports. Chapter 18 also regulates analysis of expansive soils and the determination of the depth to groundwater table. There are varying seismic design categories that require analysis of slope instability, liquefaction, total and differential settlement, surface displacement due to faulting or seismically induced lateral spreading or lateral flow, and lateral earth pressures on retaining walls. It also requires addressing mitigation measures to consider in structural design, which may include ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. The potential for liquefaction and soil strength loss must be evaluated for site-specific peak ground acceleration, earthquake magnitude, and source characteristics consistent with the maximum considered earthquake ground motions. Peak ground acceleration must be determined as specified in CBC Chapter 18.

Finally, Appendix Chapter J of the 2013 CBC regulates grading activities, including drainage and erosion control and construction on unstable soils, such as expansive soils and areas subject to liquefaction.

**California Alquist-Priolo Earthquake Fault Zoning Act.** The Alquist-Priolo Earthquake Fault Zoning Act (Pub. Res. Code Division 2, Chapter 7.5, commencing with Section 2621) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The act’s main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards.

**Seismic Hazards Mapping Act.** The Seismic Hazards Mapping Act addresses non-surface fault rupture earthquake hazards, including strong ground shaking, liquefaction, and seismically induced landslides. The California Geological Survey is the principal state agency charged with implementing the act and is required to provide local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The goal is to minimize loss of life and property by identifying and mitigating seismic hazards. Site-specific geotechnical hazard investigations are required when construction projects fall within these areas.

**State Water Resources Control Board.** The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) are responsible for assuring implementation and compliance with the provisions of the Clean Water Act and the Porter-Cologne Water Quality Control Act. The Central Coast RWQCB office regulates water quality in streams and aquifers throughout the central coast of California and the Monterey Bay region through designation of beneficial uses, establishment of water quality objectives, and administration of the National Pollutant Discharge Elimination System (NPDES) permit program for storm water and construction site runoff.
Point source discharges to surface waters are generally controlled through waste discharge requirements issued under federal NPDES permits. NPDES permits are required for several categories of storm water dischargers, including for cities that operate storm water management systems (e.g. roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) that are used to collect, convey, and discharge storm water to surface water bodies. An NPDES permit usually contains components such as discharge prohibitions, effluent limitations, and necessary specifications and provisions to ensure proper treatment, storage, and disposal of stormwater discharges.

Construction activity on projects that disturb one or more acres of soil, or less than one acre but are part of a larger common plan of development that in total disturbs one or more acre, must develop and implement a Storm Water Pollution Prevention Program (SWPPP). The SWPPP must list best management practices that the City will use to reduce pollutants, including sediment, contained in storm water runoff. The best management practices include a range of actions for avoiding soil erosion that produces sediment which can degrade surface water quality.

**Local Plans and Regulations**

**City of Salinas General Plan.** The Safety Element of the General Plan contains a range of goals and policies related to minimizing geologic and soils hazards. Key policies and programs are as follows:

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

- **Implementation Program COS-1:** To reduce pollutants in urban runoff, require new development projects and substantial rehabilitation projects to incorporate Best Management Practices (BMPs) pursuant to the National Pollutant Discharge Elimination System (NPDES) permit to ensure that the City complies with applicable state and federal regulations.

- **Policy S-4.1:** During the review of development proposals, investigate and mitigate geologic and seismic hazards, or require that development be located away from such hazards, in order to preserve life and protect property.

- **Implementation Program S-16:** To minimize damage from earthquakes and other geologic activity, implement the most recent state and seismic requirements for structural design of new development and redevelopment.
Implementation Program S-17: During review of discretionary development and redevelopment proposals, require surveys of soil and geologic conditions by state licensed Engineering Geologists and Civil Engineers where appropriate. When potential geologic impacts are identified, require project applicants to mitigate the impacts per the recommendations contained within the geologic survey.

As a standard condition of approval, the City requires that all new development be consistent with the seismic building standards required in the most recent, adopted edition of the CBC.

**City of Salinas Municipal Code.** The City of Salinas Municipal Code contains regulations that address development and public safety risks related to geology and soils. Chapter 31 Article IV Sections 31-401.1, 31-401.2 and 31-402.4 includes a requirement that soils reports be prepared for divisions of land, including those proposed as part of an annexation, to evaluate and address soils hazards, including expansiveness. If a subdivision is located within a high or moderate seismic hazard area, an engineering geology and/or seismic safety report must also be prepared. Chapter 9 Article I Sections 9-1 and 9-1.1 verifies the City’s adoption of the CBC. As a standard condition of approval designed to ensure compliance with the municipal code (and to implement related General Plan policy), prior to issuance of building permits, new development must demonstrate compliance with the CBC (including its seismic safety standards).

**City of Salinas Storm NPDES Requirements, City of Salinas Storm Water Development Standards, and City of Salinas Specifications.** Point source storm water discharges to surface waters are generally controlled through National Pollution Discharge Elimination System (NPDES) waste discharge requirements that are promulgated by the State Water Resources Control Board. The City’s NPDES Permit, Order No. R3-2012-0005, NPDES Permit No. CA 0049981, Waste Discharge Requirements for City of Salinas, Municipal Storm Water Discharges became effective on June 17, 2012. The permit requires compliance with receiving water limitations with adherence to water quality standards, and implementation of Best Management Practices (BMPs) to reduce storm water pollutant discharges and protect water quality and beneficial uses. Best management practices to reduce pollutants in storm water discharges include: erosion control, sediment control, and construction site waste management practices; good housekeeping practices to control pollutants, promote waste management practices, and implement control practices to keep pollutants away from the storm drainage system; requirements to preserve pre-development hydrologic and pollutant conditions; requirements for development planning; and watershed characterization.

The City has developed storm water management ordinances and programs to implement storm water management regulations pursuant to its NPDES permit. These are embedded in the City’s Stormwater Management Plan and its Stormwater Development Standards (SWDS). The
SWMP includes all of the required and recommended control programs for municipal facilities, industrial facilities, and commercial facilities. The SWMP describes the minimum procedures and practices the City uses to reduce pollutants in storm water and non-storm water discharges. It outlines procedures and responsibilities for protecting water quality, including the selection and implementation of BMP practices.

The City of Salinas Development and Engineering Services Division follows the guidelines presented in the City's Standard Specifications, Design Standards, and Standard Plans – 2008 Edition for design and construction of development and improvement projects within the City. To minimize soil erosion and protect surface water quality during project construction phase, development plans within the City must also comply with the guidelines presented in Appendix A of this document - Standards to Control Excavations, Cuts, Fills, Clearing, Grading, Erosion, and Sediment. Section 3, General Provisions, Subsection (a) and (d) are particularly relevant to preventing erosion and water quality impacts:

(a) No person shall cause or allow the persistence of a condition on any site that could cause accelerated erosion. Accelerated erosion shall be controlled and/or prevented by Permitee or the property owner by using measures outlined in subsequent sections as applicable, especially when work is on geologically unstable areas, on slopes above twenty percent 20%, and/or on soils rated a severe erosion hazard. Additional measures may be necessary and may be specifically required by the City Engineer.

(e) The property owner and the person(s) doing or causing or directing the grading shall put into effect and maintain all Best Management Practices necessary to protect adjacent watercourses and public or private property from damage by erosion, flooding, or deposition of mud or debris originating from the site. Precautionary measures shall include provisions for properly designed erosion and sediment control measures, so that downstream properties are not affected by upstream erosion or sediment transport by storm water. If, in the opinion of the City Engineer, grading activities result in a need for post-construction runoff control measures, then such measures, (including Low Impact Development devices/systems), shall be required to be installed, as specified in the City of Salinas Storm Water Development Standards.

The standards reiterate the NPDES permit requirements and requirements for a SWPPP and implementing BMPs as required consistent with the City's NPDES permit.
Thresholds or Standards of Significance

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of geology and soils, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on these subjects, or indeed on any subject addressed in the checklist. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - 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;
  - strong seismic ground shaking;
  - seismic-related ground failure including liquefaction; or
  - landslides;

As described in the Environmental Setting section above, there is a low risk from landslide activities within the Target Areas. No further discussion of this issue is necessary.

- result in a substantial soil erosion or the loss of topsoil;
- 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;
- be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property; or
- have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

As described in the Environmental Setting section above, there are no known active faults within or adjacent to the City and no related Alquist-Priolo Special Studies Zones. There is no potential for exposing people or structures to risk from earthquake fault rupture. No further discussion of this issue is necessary.
The City’s existing wastewater collection/conveyance infrastructure would be extended to future development within the Target Areas. Septic tanks or alternative wastewater disposal systems will not be utilized. No further discussion of this issue is necessary.

**Analysis, Impacts, and Mitigation**

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

It is noteworthy that, in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 (“*CBIA*”), the California Supreme Court held that “agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents.” (Italics added.) For this reason, the court found the following language from CEQA Guidelines section 15126.2, subdivision (a), to be invalid: “[A]n EIR on a subdivision astride an active fault line should identify as a significant effect the seismic hazard to future occupants of the subdivision. The subdivision would have the effect of attracting people to the location and exposing them to the hazards found there.” (*Id.* at p. 390.)

The court did not hold that CEQA never requires consideration of the effects of existing environmental conditions on the future occupants or users of a proposed project. But the circumstances in which such conditions may be considered are narrow: “when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project’s impact on the environment - and not the environment's impact on the project—that compels an evaluation of how future residents or users could be affected by exacerbated conditions.” (*Id.* at pp. 377-378, italics added.) Because this exception to the general rule would presumably never apply to existing seismic hazards, the court concluded that this particular topic was outside the ambit of CEQA. (*Id.* at p. 390.) The court also recognized that, within the entirety of CEQA, certain very specific statutes require consideration of existing conditions on project occupants; and the court treated these statutes as exceptions to the general rule it announced. (*Id.* at pp. 391-392.)

In light of the *CBIA* decision, the City is not required by CEQA to address the extent to which existing seismic hazards – in the form of possible earthquakes, groundshaking, liquefaction, or subsidence – could affect future occupants or users of lands that might be developed in the future. Even so, the City believes that such issues are important from a public policy standpoint,
and intends to address them under its police power, as opposed to under CEQA. (See Cal. Const., Art. XI, § 7; Associated Home Builders, Inc. v. City of Livermore (1976) 18 Cal.3d 582, 600-601; Candid Enterprises, Inc. v. Grossmont Union High School District (1985) 39 Cal.3d 878, 875; DeVita v. County of Napa (1995) 9 Cal.4th 763, 782.) Thus, readers should treat the discussions below of impacts on future project residents and users as being beyond the scope of CEQA, and provided to the public on a voluntary basis in the interests of full disclosure.

**IMPACT: EXPOSURE OF PEOPLE AND STRUCTURES TO HAZARDS ASSOCIATED WITH SEISMIC SHAKING (LESS THAN SIGNIFICANT)**

Future development within the Target Areas will likely be subject to significant seismic ground shaking in the event of an earthquake on one or more active and potentially active faults in the County and vicinity. If improvements and structures are not constructed to withstand expected shaking intensities, such facilities could be damaged with associated risks to public health and safety. This would be considered a significant adverse environmental impact.

As described in the Regulatory Setting section above, seismic hazard risk related to facility and building development is regulated through the CBC. All future development within the Target Areas must be constructed consistent with the seismic safety standards contained in the CBC, which are adopted by the City. The City includes this requirement as a standard condition of approval for all new development projects. The City of Salinas Permit and Inspection Services, a division of the Community Development Department, is responsible for reviewing building plans for new development for this purpose prior to approval of a building permit.

Conformance with the CBC and the City’s related condition of approval will reduce the potential impacts from seismic shaking to a less-than-significant level. No mitigation measures are necessary.

**IMPACT: EXPOSURE OF PEOPLE AND STRUCTURES TO LIQUEFACTION HAZARDS (LESS THAN SIGNIFICANT)**

Given that it is possible that seismic shaking-induced liquefaction hazards could pose a risk to public health and safety if buildings and/or other improvements are damaged during a liquefaction event. The potential for development within any given Target Area to be subject to liquefaction risk is dependent on site-specific conditions. Consistent with General Plan policy S-4.1 and its implementing actions, as a standard condition of approval, the City will require that developers of future projects within the Target Areas to prepare detailed geotechnical investigations. The investigations will generally include soil borings to evaluate subsurface conditions to fully characterize the extent of seismic/liquefaction hazards. Project developers will be required to incorporate all recommendations from their respective geotechnical reports.
into the design of their projects to minimize liquefaction hazard risk. Building plans and design drawings are subject to review and approval by the City of Salinas Permit and Inspection Services Division for consistency with the recommendations. This analysis and design process will reduce potential significant hazards impacts from liquefaction to a less-than-significant level. No mitigation measures are necessary.

**IMPACT: POTENTIAL FOR SOIL EROSION DURING CONSTRUCTION AND OPERATION OF NEW DEVELOPMENT WITHIN TARGET AREAS (LESS THAN SIGNIFICANT)**

As described in the Environmental Setting section above, soils within the Target Areas generally have minimal to moderate erosion hazard potential. However, during construction of improvements, erosion of exposed soil surfaces and/or from exposure to concentrated storm water runoff from development sites during storm events is possible. Soil erosion can lead to degradation of downstream surface water bodies.

General Plan Policy COS-1.6 requires that the City enforce NPDES requirements and participate in regional efforts to protect and enhance water quality. Implementation Program COS-1 requires new development projects and substantial rehabilitation projects to incorporate BMPs pursuant to the City’s NPDES permit to ensure that the City complies with applicable state and federal regulations. New development must also comply with the City’s Standard Specifications, Design Standards, and Standard Plans starting on page 137 under Standards to Control Excavations, Cuts, Fills, Clearing, Grading, Erosion, and Sediment. Implementation of Policy COS-1.6 and Implementation Program COS-1, and required project consistency with the grading standards would ensure that potential soil erosion impacts are less than significant. No mitigation measures are required.

Please refer to section 3.9, Hydrology and Water Quality, for discussion of NPDES requirements for managing storm water from construction sites (for reduction of erosion potential) and for post-construction stormwater management to reduce potential for hydromodification of stormwater receiving bodies.

**IMPACT: POTENTIAL IMPACTS TO STRUCTURES AND INFRASTRUCTURE FROM EXPANSIVE SOILS (LESS THAN SIGNIFICANT)**

Soils within the Target Areas have varying potential for expansiveness. As described previously, as a standard condition of approval for new development projects, the City will require project applicants to prepare detailed geotechnical investigations. Soils conditions will be evaluated as part of the investigation to characterize potential hazards from expansive soils. In the event that soil expansiveness is identified as a significant risk, the investigations would include recommendations for building and improvement design consistent with the CBC as needed to minimize risk. Conformance of future development with the performance standards contained in
the CBC would be assured through review and approval of project development plans by the City of Salinas Permit and Inspection Development and Engineering Services Divisions. Therefore, the potential impact from expansive soil would be less than significant. No mitigation measures are necessary.

### 3.8 HAZARDS AND HAZARDOUS MATERIALS

This section of the EIR addresses hazards and hazardous materials effects associated with development of the Target Areas.

Information is this section is derived from a variety of sources including, but not limited to:

- *City of Salinas General Plan* (Cotton/Bridges/Associates 2002);
- *City of Salinas General Plan Final Environmental Impact Report* (Cotton/Bridges/Associates 2002);
- *Monterey County General Plan* (County of Monterey 2010);
- *Monterey County General Plan Draft Environmental Impact Report* (ICF Jones & Stokes September 2008);
- *Monterey County Multi-Jurisdictional Hazard Mitigation Plan – Final Draft* (AECOM and Monterey County Hazard Mitigation Planning Team September 2014);
- California Department of Toxic Substances Control EnviroStor Database; and
- California State Water Resources Control Board GeoTracker Database.

No comments on hazards and hazardous materials issues were received on the NOP.

**Environmental Setting**

**Agriculture and Hazardous Materials Conditions**

Land within Target Areas B, F, K, L2, N and V has historically and is currently predominately in agricultural production. Agricultural operations can be sources of hazardous materials conditions. For example, pesticides and fertilizers may have been stored and applied. Storage of these materials, including in underground or above-ground tanks, could have resulted in concentrated accidental release of the materials over time. Non-agricultural related activities located within the Target Areas could also be or could have been sources of hazardous materials conditions.
3.0 Environmental Setting, Impacts and Mitigation Measures

School Locations

Based on review of aerial imagery, twelve school sites are located near several of the Target Areas. Gavilan View Middle School is located approximately 0.15 mile from the eastern boundary of Target Area K. Oasis Charter Public School is located near Target Area L2 and. El Puente School and Mount Toro High School are located adjacent to Target Area V. Pacific Coast Christian Academy/Little Lambs Pre-school is located near Target Area K. Mission Trails ROP and Virginia Rocca Barton Elementary School are located to the north of Target Area V within the Carr Lake Area. El Gabilan Elementary School, Loma Vista Elementary School, and Madonna Del Sasso School are located in the vicinity of Target Area V. Monterey Park Elementary School and Monterey County Home Charter School are located near Target Area N.

Airport Area of Influence

The Salinas Municipal Airport is located in the southeastern portion of the City. Figure 5.6-3 in the General Plan EIR depicts the Salinas Municipal Airport Area of Influence. None of the Target Areas area located within the Area of Influence. Please refer to Regulatory Setting section below for more information about land use compatibility standards and development regulations that apply within the Area of Influence.

Existing Hazardous Materials Sites/Hazards

A search of the California Department of Toxic Substances Control EnviroStor database was conducted to identify whether recorded hazardous materials sites are located within or adjacent to the Target Areas. None were identified. Two hazardous material sites were identified within one mile of a Target Area. These sites are discussed below for informational proposes and do not have bearing on the analysis of potential impacts.

A delisted Superfund site is located within one mile of the Target Areas B and F. The Firestone Tire & Rubber Company Salinas Plant at 340 El Camino Real South, Salinas operated as a tire plant between 1963 through 1980 and during operations, solvents and other chemicals were released into the soil and groundwater. The RWQCB granted case closure in July 2000 and the DTSC performs Five Year Reviews for this site to evaluate whether groundwater quality has fully achieved cleanup standards. Former Pacific Gas and Electric Company (PG&E) Salinas Manufactured Gas Plant Site at 2 Bridge Street, Salinas is located approximately one-half mile from Target Area V. PG&E is currently monitoring the site for petroleum hydrocarbon compounds, free cyanide, and Title 22 metals.
A search of the State Water Resources Control Board GeoTracker database was also conducted. There are six open sites under the Site Cleanup Program that are located within one mile of Target Area V. Forty-two recorded open active leaking underground storage tank (LUST) sites are located within the City. Of the 42 open active sites, 27 active LUST sites are located within one mile of Target Area V. Two active LUST sites are located within one mile of Target Area B or Target Area N. The cleanup status of these open Site Cleanup Program and LUST sites include site assessment, interim remediation, active remediation, verification monitoring, or under review for case closure (http://geotracker.waterboards.ca.gov/map/?CMD=run report&myaddress=Salinas+CA).

**Aerially Deposited Lead**

Until their use in the 1990s was banned, additives in gasoline expelled lead-based compounds from engine exhaust. Consequently, lead was aerially deposited as a particulate in concentrations along the shoulders and medians of roadways. Concentrations are likely higher along roadways that have historically carried high volumes of traffic. Lead can be hazardous to human health and the U.S. EPA has considered lead to be a probable human carcinogen (http://www3.epa.gov/ttn/atw/hlthef/lead.html).

U.S. Highway 101 has carried high volumes of traffic since the 1950s. It is possible that aerially deposited lead is present in surface soils that are located at the margins of the highway in concentrations that could pose a health risk if the soils are disturbed. Target Areas B, F, V L2, and K are located along U.S. Highway 101.

**Wildland Fire Hazard**

According to the California Department of Forestry and Fire Protection Fire Hazard Safety Zone Map for Monterey County, none of the Target Areas is located within a moderate, high, or very high fire hazard safety zone (http://frap.fire.ca.gov/webdata/maps/monterey/fhszl_map.27.pdf).

**Regulatory Setting**

**Federal**

**U.S. Environmental Protection Agency.** The U.S. Environmental Protection Agency (EPA) was established in 1970 to consolidate a variety of federal research, monitoring, standard-setting, and enforcement activities in one agency to ensure environmental protection. EPA’s mission is to protect human health and safeguard the natural environment (i.e., air, water, land) upon
which life depends. EPA works to develop and enforce regulations that implement environmental laws enacted by Congress. The agency is responsible for researching and setting national standards for a variety of environmental programs and delegates the responsibility for using permits and monitoring and enforcing compliance to states and tribes. Where national standards are not met, EPA can issue sanctions and take other steps to help states and tribes reach desired levels of environmental quality.

**Resource Conservation and Recovery Act.** Under the Resource Conservation and Recovery Act (RCRA) of 1976, individual states may implement their own hazardous waste programs in lieu of RCRA as long as the state program is at least as stringent as federal RCRA requirements. The EPA must approve state programs intended to implement federal regulations. In California, the California Environmental Protection Agency (Cal/EPA) and the Department of Toxic Substances Control (DTSC), a department within Cal/EPA, regulate the generation, transportation, treatment, storage, and disposal of hazardous waste. The EPA approved California’s RCRA program, called the Hazardous Waste Control Law (HWCL), in 1992. DTSC has primary hazardous material regulatory responsibility, but can delegate enforcement responsibilities to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials under the authority of the HWCL.

The hazardous waste regulations establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe the management of hazardous wastes; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in ordinary landfills. Hazardous waste generators must retain hazardous waste manifests for a minimum of three years. These manifests provide a description of the waste, its intended destination, and regulatory information about the waste. A copy of each manifest must be filed with the State. The generator must match copies of hazardous waste manifests with receipts from treatment, storage, and disposal facilities.

**Comprehensive Environmental Response, Compensation and Liability Act.** The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and associated Superfund Amendments provide the EPA with the authority to identify hazardous sites, require site remediation and recover the costs of site remediation from polluters. California has enacted similar laws intended to supplement the federal program. The DTSC is primarily responsible for implementing California’s Superfund Law.

**Occupational Safety and Health Administration.** The federal Occupational Safety and Health Administration’s (OSHA’s) mission is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA’s staff establishes and enforces protective standards and reaches out to employers and employees
through technical assistance and consultation programs. OSHA standards are listed in 29 CFR 1910. CFR Chapter 29, Sections 1910 (General Industry) and 1026 (Construction), promulgates regulations for the preparation of Health and Safety Plans (HASPs). HASPs identify potential hazards associated with a proposed land use and may provide appropriate mitigation measures as required.

Federal Aviation Administration. The Federal Aviation Administration (FAA) regulates aviation at regional, public, private, and military airports. The FAA regulates objects affecting navigable airspace and structures taller than 200 feet according to Federal Aviation Regulation 49 CFR 77.13. The U.S. Department of Transportation and Caltrans require the Project proponent to submit FAA Form 7460-1, Notice of Proposed Construction or Alteration. According to 49 CFR 77.17, notification allows the FAA to identify potential aeronautical hazards in advance, thereby preventing or minimizing any adverse impacts on the safe and efficient use of navigable airspace. Any structure that would constitute a hazard to air navigation, as defined in this FAA regulation, would require issuance of a permit from Caltrans' Aeronautics Program. The permit is not required if the FAA aeronautical study determines that the structure would have no impact on air navigation.

State

California Environmental Protection Agency. Cal/EPA was created in 1991. It unified California's environmental authority in a single cabinet-level agency and brought California Air Resources Board (ARB), State Water Resources Control Board, Regional Water Quality Control Boards (RWQCB), CalRecycle, Department of Toxic Substance Control (DTSC), Office of Environmental Health Hazard Assessment, and the Department of Pesticide Regulation under one agency. These agencies were placed within the Cal/EPA “umbrella” for the protection of human health and the environment to ensure the coordinated deployment of State resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substance Control. DTSC, a department of Cal/EPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the Federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

Government Code section 65962.5 requires DTSC and the Department of Health Services (now the Department of Public Health) to maintain a list (commonly known as the Cortese List) of
hazardous waste facilities and sites, contaminated drinking water wells, sites listed by the SWRCB as having UST leaks or a discharge of hazardous wastes or materials into the water or groundwater, and sites with a known migration of hazardous waste/material.

**California Office of Emergency Services.** To protect public health and safety as well as the environment, the California Office of Emergency Services (OES) is responsible for establishing and managing statewide standards for business and area plans related to the handling and release, or threatened release, of hazardous materials. OES requires basic information regarding hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and health risks) to be available to firefighters, public safety officers, and regulatory agencies. Typically, this information should be included in business plans to prevent or mitigate impacts on the environment or the health and safety of individuals from the release, or threatened release, of these materials into the workplace and environment. These regulations are covered under Chapter 6.95 of the California Health and Safety Code, Article 1, Hazardous Materials Release Response and Inventory Program (Sections 25500 to 25520), and Article 2, Hazardous Materials Management (Sections 25531 to 25543.3).

Title 19 of the California Code of Regulation (CCR) establishes minimum statewide standards for hazardous materials business plans. These plans must include the following: 1) a hazardous material inventory in accordance with Sections 2729.2 to 2729.7, 2) emergency response plans and procedures in accordance with Section 2731, and 3) training program information in accordance with Section 2732. Business plans should contain basic information regarding the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the State. Each business would prepare a hazardous materials business plan if that business uses, handles, or stores a hazardous material or an extremely hazardous material in quantities greater than or equal to the following:

- 500 pounds of a solid substance;
- 55 gallons of a liquid;
- 200 cubic feet of compressed gas;
- A hazardous compressed gas in any amount; or
- Hazardous waste in any quantity.

**California Occupational Safety and Health Administration.** The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety related to the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR 337–340). The
regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings (8 CCR 5192 outlines standards for the preparation of HASPs).

**California Code of Regulations, Title 22, Section 66261.20-24.** Soils having concentrations of contaminants higher than certain acceptable levels must be handled and disposed of as hazardous waste when excavated. The California Code of Regulations, Title 22, Section 66261.20-24 contains technical descriptions of characteristics that would cause a soil to be classified as a hazardous waste.

**Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program).** In January 1996, the Cal/EPA adopted regulations implementing the Unified Program. The program has six elements: 1) hazardous waste generators and hazardous waste on-site treatment; 2) underground storage tanks; 3) aboveground storage tanks; 4) hazardous materials release response plans and inventories; 5) risk management and prevention programs; and 6) Uniform Fire Code hazardous materials management plans and inventories. The plan is implemented at the local level. The local agency that is responsible for the implementation of the Unified Program is the Certified Unified Program Agency (CUPA), and the Monterey County Department of Environmental Health Department is designated the CUPA.

**California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act).** The Business Plan Act requires that any business that handles hazardous materials prepare a business plan, which must include the following:

- Details, including floor plans, of the facility and business conducted at the site;
- An inventory of hazardous materials that are handled or stored on site;
- An emergency response plan; and
- A safety and emergency response training program for new employees with annual refresher courses.

**State Water Resources Control Board Underground Storage Tank Program.** The State Water Resources Control Board (SWRCB) established regulations governing prevention of leaks from underground storage tanks (USTs). There are published standards and requirements for installation, tank construction, tank testing, leak detection, spill containment and overfill protection. California UST laws and regulations give local agencies (counties, cities, or other local agencies) authority throughout the State to issue permits for tank operation and to enforce tank testing requirements within their jurisdiction. In Monterey County, the Monterey County Department of Environmental Health Department (the CUPA) issues permits for the operation of underground storage tanks and oversees the installation, operation and removal.
Hazardous Materials Transportation Regulations (26 CCR). The State has also adopted U.S. Department of Transportation regulations for the intrastate movement of hazardous materials. State regulations are contained in 26 CCR. In addition, the State regulates the transportation of hazardous waste originating in the state and passing through the state (26 CCR). Both regulatory programs apply in California. The two State agencies with primary responsibility for enforcing federal and State regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol (CHP) and the California Department of Transportation.

California Vehicle Code Section 32000. Common carriers are licensed by the CHP, pursuant to California Vehicle Code Section 32000. This section requires the licensing of every motor (common) carrier who transports, for a fee, in excess of 500 pounds of hazardous materials at one time, and every carrier, if not for hire, who carries more than 1,000 pounds of hazardous material of the type requiring placards.

California Accidental Release Prevention Program. The California Accidental Release Prevention Program regulations became effective January 1, 1997, replacing the California Risk Management and Prevention Program. The California Accidental Release Prevention Program was created to prevent the accidental release of regulated substances. It covers businesses that store or handle certain volumes of regulated substances at their facilities. A list of regulated substances is found in Section 2770.5 of the California Accidental Release Prevention Program regulations. If a business has more than the listed threshold quantity of a substance, an accidental release prevention program must be implemented and a risk management plan may be required. The California OES is responsible for implementing the provisions of the California Accidental Release Prevention Program.

Local Plans and Regulations

Monterey County Department of Environmental Health – Local Regulatory Agency. The Monterey County Department of Environmental Health is designated by the California Environmental Protection Agency as a Certified Unified Program Agency. As a Certified Unified Program Agency, the Monterey County Department of Environmental Health is responsible, at the local level, for the administrative requirements, permits, inspections, and enforcement activities of six state level environmental and emergency response programs, including those that relate specifically to public safety and hazardous materials. The department fields the county’s hazardous materials Emergency Response Team which responds to any hazardous materials incidents that may occur in the county. The Monterey County Department of Environmental Health administers several programs designed to implement these regulations. The programs include the following:
Hazardous Material Business Plan and Inventory Program;
- Hazardous Waste Generator Program;
- Hazardous Waste Onsite Treatment: Tiered Permitting Program;
- Underground Storage Tank Program;
- California Accidental Release Prevention Program; and
- Aboveground Petroleum Storage Tank Program.

As a fundamental component of several of these programs, facilities which generate any quantity of hazardous waste or which handle hazardous materials in amounts greater than 55 gallons for liquids, 500 pounds for solids, and/or 200 cubic feet for compressed gases must prepare a Business Response Plan and Inventory. Business Response Plans must include specific information on hazardous materials handled (inventory), emergency contacts, notification procedures, evacuation plans, training procedures and a site map. Facilities which handle extremely hazardous (regulated materials) may also be required to prepare a Risk Management Plan. A Risk Management Plan must address several issues including types of substances handled, accidental release and chemical-specific prevention, accident history, emergency response program, etc.

Monterey County Airport Land Use Compatibility Regulations. Land use compatibility for development in the immediate vicinity of airports is addressed in airport land use plans that are adopted by the County. A significant purpose of the plans is to ensure that public health and safety from airport operations (e.g. noise exposure and risks to public safety from aircraft approach and landing hazards) are minimized through land use compatibility standards. New development adjacent to airports is to be managed to minimize potential incompatibilities with airport operations.

Airport land use compatibility regulations for development in and around the Salinas Municipal Airport are found in the City’s Airport Overlay District standards in the Zoning Code. These standards apply to new development within the airport Area of Influence. Development within the boundary of the Airport Overlay District is subject to height and use restrictions found in Zoning Code sections 37-40.420(a)(b), 37-40.430, 37-40.440, and 37-40.450. In addition, all development within the Airport Overlay District is subject to guidelines and restrictions found in Chapter 4, Airport, of the Salinas Municipal Code and to applicable state and federal regulations. Excerpts from these Zoning Code sections are included in the City of Salinas Municipal Code subsection below.

Monterey County Office Emergency Services. The Office of Emergency Services is an agency of the County Administrative Office that develops and maintains various emergency plans, including incident response plans for certain types of incidents and coordinated emergency
response plans for certain geographical threat areas. The Office of Emergency Services works in concert with other State and local governments and federal agencies to provide for coordinated and effective multi-agency response and relief during emergency situations.

**Monterey County Multi-Jurisdictional Hazard Mitigation Plan.** The 2014 Monterey County Multi-Jurisdictional Hazard Mitigation Plan was prepared under the oversight of the Office of Emergency Services with a collaborative partnership with the Monterey County Hazard Mitigation Planning Team, National Oceanic and Atmospheric Administration, Federal Emergency Management Agency, and National Association of Counties. The plan evaluates various hazards in the County including: agricultural emergencies, coastal erosion, flooding, dam failure, drought, earthquakes, landslides, sea level rise, tsunami, wildland fire, windstorms, and hazardous materials. Vulnerability analysis and capability assessments to identify and mitigate these hazards throughout the County are also discussed. The plan also contains countywide mitigation goals (Table 7.1, p. 7-3) and mitigation actions that incorporate government authorities, policies or codes from local plans and regulations that influence the way land and buildings are developed and built.

Appendix Q of the Multi-Jurisdictional Hazard Mitigation Plan includes the City of Salinas locally adopted Mitigation Action Plan, which identifies the City responsibilities in response to natural or man-made hazards. The plan outlines facilities and infrastructure that is most crucial in addressing natural or man-made hazards. It also provides an inventory of public and quasi-public structures in the city, and estimated insured structural value of these facilities. The plan identifies Salinas’ vulnerability to disasters including agricultural emergencies, dam failure, earthquakes, floods, hazardous material events, wildland fires, and windstorms. Multi-Jurisdictional Hazard Mitigation Plan Table Q-6 is a listing of plans, ordinances, programs, and policies that address and mitigate man-made and natural safety hazards. The plan also includes a matrix of action items (Table Q-9) for Salinas that identifies their priority actions, progress, administering department, funding, timeframe, and status. These action items correspond with federal and state guidelines establish to address and mitigate hazards through infrastructural updates and compliance requirements.

**Monterey County Emergency Evacuation.** Monterey County has designated emergency evacuation routes throughout the County. The routes are designated and maintained to ensure the safe and efficient movement of people, belongings, and emergency personnel including their support services during times of declared emergencies. These routes include U.S. Highway 101, state highways, several numbered County roads, and various other County roads. These routes are considered “Pre-designated Emergency Evacuation Routes” and may be deployed when necessary.

**City of Salinas General Plan.** The Safety Element of the City of Salinas General Plan contains a range of goals and policies related to minimizing human-related hazardous conditions. Key policies and programs are as follows:
Goal S-3: Protect the community from hazards related to air and ground transportation, hazardous materials, and air pollution, as well as other human activities.

Policy S-3.1: To reduce the risk posed by air pollution, work with responsible federal, state, and county agencies to decrease air pollution emissions occurring within the air basin.

Policy S-3.2: Ensure that hazardous materials used in residential, business and industry are properly handled and that information on their handling and use is available to residents, fire protection and other safety agencies.

Policy S-3.3: Work with federal and state agencies to identify toxic disposal or leakage sites and pursue prompt cleanup.

Policy S-3.4: Work with the State, agribusiness and agricultural worker organizations to ensure that agricultural use of pesticides and fertilizers do not negatively affect public health and safety.

Policy S-3.5: Limit hazardous waste facilities within the planning area to transfer stations, which shall be limited to the collection, temporary storage, and transfer of small quantity generator and household hazardous waste as specified in the Monterey County Hazardous Waste Management Plan.

Policy S-3.6: Limit the location of a Hazardous Waste Transfer Station to land designated for General Industrial use and ensure that the station conforms to the siting criteria in the Monterey County Hazardous Waste Management Plan.

Policy S-3.7: Reduce the risk from ground transportation hazards, such as rail, truck, and roadway systems.

Policy LU-12.2: Review development proposals within areas affected by the operation of the airport to ensure airport and land use compatibility, protect the public safety, and allow for continued aviation operations. This includes minimizing residential population increases within the 55 decibel Community Noise Equivalent Level contour.

Policy LU-12.3: As a condition of development approval of projects within the Airport Local Area of Influence (as shown in General Plan...
Figure LU-11), require dedication of an avigation easement. Said avigation easement shall include special provisions for properties within the 1-mile clear zone required for the California International Airshow.

**Policy S-3.8:** Maintain open space adjoining Salinas Municipal Airport as required for safety for both the present runway configurations and for possible future expansions.

**Policy S-3.9:** Plan for future airport operations, considering possible expansion of airport operations, services, and the proximity of adjacent land uses.

**Policy S-3.10:** Encourage development in the vicinity of the Salinas Municipal Airport that would not cause land use conflicts, hazards to aviation, or hazards to the public and that is in compliance with the California Airport Land Use Planning Handbook.

**City of Salinas Municipal Code.** The Municipal Code contains a range of regulations that address hazardous materials and safety conditions.

**Chapter 16 Health and Sanitation Code, Article X, Hazardous Materials Storage and Registration**

Article X of Chapter 16 of the municipal code provides a continuing source of current information concerning hazardous substances and chemicals being utilized in the City of Salinas to protect the general health and safety of the public and to enable emergency personnel (firefighters, health officials, health care providers, law enforcement agencies and emergency communication officers) to respond safely and speedily to emergency situations which may arise. This includes documentation of storage and use of hazardous materials on a hazardous material registration form for businesses that handles hazardous materials at any time during the calendar year. Article X also establishes orderly procedures that will ensure that newly constructed underground storage tanks storing hazardous substances or wastes meet appropriate standards and that existing tanks be properly maintained, inspected, and tested so that the health, property, and resources of the people of the city will be protected.
Chapter 37 Zoning Code, Article IV, Airport Overlay District Regulations, Division 7

Section 37-40.420. (a) Development Review Applications, Structures, and Vegetation. This division shall apply to development review applications, structures, and vegetation if located on or proposed for land situated within the “area of influence” of the Salinas municipal airport.

(b) Tall Structures. This division also applies to any development review application for construction or alteration of a structure (including antennas, poles, or towers) higher than two hundred feet above ground level at the site, regardless of the site's location within the city of Salinas. Any such structure shall comply with the requirements of the Salinas Municipal Code, Chapter 4: Airport.

Section 37-40.430. Any development review application identified in Section 37-40.420(a) or (b) shall be reviewed by the deputy city manager, or their designee, to ensure conformance with the Salinas Municipal Code, Chapter 4: Airport, prior to approval by the applicable reviewing body. (Ord. No. 2463 (NCS))

Section 37-40.440. Use classifications, development regulations, and design standards shall be those of the underlying base zoning district (as identified in Article III: Base District Regulations of the Zoning Code) except as modified by the airport overlay. All development activity listed in Sections 37-40.420(a) and (b) of this division shall conform to the requirements and development regulations of Salinas Municipal Code, Chapter 4: Airport. (Ord. No. 2463 (NCS)).

Sec. 37-40.450. (a) Avigation Easement Dedication. The city shall require the owner of any property located in the Salinas Municipal Airport “area of influence” to dedicate an avigation easement as a condition of approval of any development review application, or structure identified in Section 37-40.420(a) or (b). The easement is required to protect the airport airspace from objects which could constitute hazards to air navigation, and to inform future owners and prospective purchasers of the property that aircraft may fly over the location at low altitudes while approaching, departing, or maneuvering near the associated airport. Such easement shall include special provisions, for properties within the clear zone, required for the California International Airshow (see Figure 37-40.240 of the Zoning
The easement shall be dedicated prior to the recordation of any land division or if there is no land division prior to the issuance of the first building permit for the development.

(b) Avigation Easement Provisions. The language of the avigation easement shall be as set forth by resolution of the Salinas city council.

**Standards of Significance**

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of hazards and hazardous materials, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on these subjects, or indeed on any subject addressed in the checklist. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (*Ibid.*) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The Appendix G questions on the subject of hazards and hazardous materials also give rise to additional thresholds that are not relevant to the proposed project. Under these thresholds, significant effects would occur if a proposed project would:

- 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, create a significant hazard to the public or the environment;
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, result in a safety hazard for people residing or working in the project area;

For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area; or

Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

None of these additional thresholds is relevant to the proposed project. As described in the Environmental Setting section above, there are no hazardous sites included on federal or state lists pursuant to Government Code Section 65962.5 within the Target Areas. No further discussion of this issue is necessary.

None of the Target Areas are located within the Salinas Municipal Airport Area of Influence. Therefore, no specific hazards to future development within the Target Areas from airport operations are expected. Therefore, no further discussion of this issue is necessary.

As described in the Environmental Setting section above, there are no private airstrips in the vicinity of the Target Areas. No further discussion of this issue is necessary.

Based on the discussion in the Environmental Setting section above, none of the Target Areas is located within a wildfire hazard area. No further discussion of this issue is necessary.

**Analysis, Impacts, and Mitigation**

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

**IMPACT: ACCIDENTAL RELEASE OF HAZARDOUS MATERIALS USED BY DEVELOPMENT WITHIN THE TARGET AREAS COULD RESULT IN POTENTIAL HAZARDS TO THE PUBLIC OR ENVIRONMENT (LESS THAN SIGNIFICANT)**

Construction and operations of future development within Target Areas B, F, K, L2, N and V could involve transport, use, storage, and/or disposal of hazardous materials. These materials could include, but not be limited to lubricants, fuels, solvents, and pesticides/fertilizers.
Businesses and operations that engage in the routine use, storage, and transport of hazardous materials are regulated through a variety of federal, state, and local regulations, as summarized in the Regulatory Setting section above. Accidents occurring from the routine use, storage, and transport of hazardous materials could result in a significant adverse environmental impact.

At the local level, the Monterey County Department of Environmental Health implements federal and state hazardous materials management regulations to protect the public health and environment. All qualifying businesses must register with and prepare a hazardous materials business plan that is approved by the Monterey County Department of Environmental Health, which also inspects and monitors businesses for conformance with the business plan. Compliance with hazardous materials management plans and monitoring of these businesses as required would eliminate or reduce the potential impacts from accidents occurring from the routine use, storage, and transport of hazardous materials within Target Areas to a less-than-significant level. No mitigation measures are necessary.

**IMPACT: PUBLIC OR ENVIRONMENTAL HAZARDS FROM EXPOSURE TO AGRICULTURAL CHEMICAL RESIDUES IN SITE SOILS DURING CONSTRUCTION OF NEW DEVELOPMENT WITHIN TARGET AREAS (LESS THAN SIGNIFICANT WITH MITIGATION)**

Agricultural production has been the predominant historical land use activity within the Target Areas. Previous agricultural practices may have resulted in accumulation of agricultural chemical residues in surface soils. If potentially harmful levels of agricultural chemicals are present, grading and earthmoving activities could expose construction workers and the general public to contaminated soils that pose a health risk. This potentially significant impact would be reduced to less than significant with implementation of the following mitigation measure.

**Mitigation Measure**

HAZ-1. Prior to the issuance of grading permits for development within Target Areas developers of individual projects shall prepare Phase I Environmental Site Assessments to determine whether agricultural chemical residues are present and could pose a public health or workers. The results of the assessments shall be included in the CEQA documentation for such projects. If hazardous materials conditions are identified that require preparation of Phase II Environmental Site Assessments, future individual project developers shall be responsible for conducting the assessments and for implementing all recommendations and requirements for remediation of hazardous materials conditions identified therein.
**IMPACT: PUBLIC OR ENVIRONMENTAL HAZARDS FROM EXPOSURE TO AERIALLY DEPOSITED LEAD IN SOILS DISTURBED BY CONSTRUCTION ACTIVITIES (LESS THAN SIGNIFICANT WITH MITIGATION)**

Target Areas B, F, L2, K, and V, are located adjacent to U.S. Highway 101. It is possible that aerially deposited lead from vehicle exhaust is present in soils located along the highway margins in concentrations that exceed safe levels. The material could be hazardous if disturbed and released during future construction activities within the noted Target Areas that are located near the highway. This would be considered a potentially significant adverse environmental impact. If aerially deposited lead is found to be present in elevated concentrations, affected soils may need remediation and disposal at a Class I landfill. Special health and safety procedures for workers working near lead contaminated areas may be necessary.

Implementation of the following mitigation measures would risks to public health and safety from lead exposure to less than significant.

HAZ-2. Project proponents within portions of Target Areas located adjacent to U.S. Highway 101 shall retain a qualified expert to provide evidence about the potential presence of aerially deposited lead in Target Areas soils. If evidence suggests the presence of aerially deposited lead, project proponents shall retain a qualified expert to conduct soil testing for aerially deposited lead in locations where project grading and excavations may have potential to result in release of this material. The testing scope should include preparation of a site-specific work plan specifying surface sample or soil boring locations, sample collection, laboratory analysis, and preparation of findings, and recommendations. The testing report must determine the concentrations of lead in such locations and whether project grading and excavations have potential to cause worker and public health and safety risks. If risks are possible, a remediation plan shall be prepared and implemented. The remediation plan shall define performance standards for the handling and disposal of contaminated soil to ensure that risks to public health and safety from transport and disposal are minimized. The testing program and remediation plans (as needed) will be completed prior to initiation of ground disturbance activities in locations where the expert has deemed that testing for aerially deposited lead is warranted. If remediation is needed in specific locations, the remediation process will also be completed prior to initiation of project related ground disturbance activities in those locations.

HAZ-3. If the aerially deposited lead testing program identified in mitigation measure HAZ-2 identifies the presence of hazardous concentrations of lead in soils to be excavated or graded, project proponents shall prepare and implement a worker health and safety plan and training program. To avoid health effects on construction personnel, all personnel who may come in contact with contaminated soil will be trained in accordance with applicable
Occupational Safety and Health Administration standards. A site-specific worker health and safety plan defining potential contaminants and, where appropriate, proper personnel protective equipment will be employed. Worker training will be completed prior to initiation of ground disturbance activities in the area(s) defined in the lead testing program to contain lead concentrations deemed to be potentially hazardous to worker and public safety.

**IMPACT: POTENTIAL FOR NEW DEVELOPMENT WITHIN TARGET AREAS TO RELEASE HAZARDOUS MATERIALS WITHIN ONE-QUARTER MILE OF AN EXISTING SCHOOL (LESS THAN SIGNIFICANT)**

Currently, four public schools are located within one-quarter mile of Target Areas K, L2, and V. Gavilan View Middle School is located near the eastern boundary of Target Area K. Oasis Charter Public School is located near Target Area L2. El Puente School and Mount Toro High School are located adjacent to Target Area V.

At this time, it is unknown what types of specific projects may locate in Target Areas K, L2, or V or whether future projects may have an elevated risk from use, storage, or transport of hazardous materials. As noted above in the discussion of potential impacts from use, storage or transport of hazardous materials, future development within the Target Areas must conform to local, state, and federal hazardous materials management regulations, including those that address land use compatibility and siting restrictions. Each future project will be subject to review by the City. Projects which may pose elevated risk from hazardous materials may also be required to obtain permits from local agencies (e.g. Monterey County), and/or state or federal responsible agencies to ensure such risks are minimized.

**IMPACT: NEW DEVELOPMENT PROPOSED WITHIN TARGET AREAS INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN (LESS THAN SIGNIFICANT)**

The Monterey County General Plan Safety Element identifies emergency evacuation routes throughout the County. These routes include U.S. Highway 101, state highways, several numbered County roads, and various other County roads. These routes are considered “Pre-designated Emergency Evacuation Routes” and may be deployed when necessary. Physical interference with these evacuation routes would be a significant impact. The Target Areas are located adjacent to or near one or more of these evacuation routes. While future development within the Target Areas would add to demand for use of emergency routes, such development would not physically interfere with the ability of the County to deploy these routes for evacuation. Therefore, the proposed project would not interfere with a local adopted emergency response plan and the impact would be less than significant.
The proposed project would also not interfere with the City's Mitigation Action Plan. The Mitigation Action Plan outlines the City's responsibility for implementation of specific mitigation actions for natural or man-made hazards throughout the City.

### 3.9 Hydrology and Water Quality

This section includes evaluation of watershed and surface water and groundwater quality conditions that could be affected by development within the proposed Target Areas. Project effects from changes to existing drainage patterns, generation of storm water runoff, discharge of storm water and resulting effects on surface water and groundwater quality, and placing new development in flood hazard areas are examined. Effects on the groundwater basin associated with the use of groundwater resources and groundwater recharge are discussed in Section 3.14, Water Supply. Information in this section is derived from a variety of sources including:

- City of Salinas General Plan Final Program EIR (Cotton/Bridges/Associates 2002);
- City of Salinas Stormwater Management Plan Update (City of Salinas 2013) (SWMP);
- City of Salinas Stormwater Development Standards for New and Redevelopment Projects (RBF Consulting 2013) (SWDS); and
- Fact Sheet/Rationale Technical Report for Order No. R3-2012-0005, NPDES Permit No. CA0049981 Waste Discharge Requirements for City of Salinas Municipal Storm Water Discharges (Central California Regional Water Quality Control Board 2013) (“CCRWQCB Fact Sheet”).

No specific comments regarding flooding and surface water and groundwater quality issues were received on the NOP.

**Environmental Setting**

**Surface Water/Storm Water Hydrology**

**Watershed Characteristics.** The City is located within the Salinas River watershed. Locally, four major creeks and several minor tributaries pass through the Salinas area and receive storm water discharges from development within the City and from lands adjacent to the City that are in agricultural production. Santa Rita Creek carries storm water discharges from a small portion of the City to the Espinosa Slough. Alisal Creek becomes the Reclamation Ditch. Natividad and Gabilan creeks flow through the northeastern portion of the City to Carr Lake. Carr Lake has
functioned historically to attenuate spring flood flows in Natividad and Gabilan creeks, and continues to function as a large retention basin in the center of the City. Flows leaving Carr Lake discharge to the Reclamation Ditch.

Under existing conditions, storm water runoff is generated when rain falls on impervious surfaces and on pervious surfaces such as soil when the rainfall intensity exceeds the rate at which the rainfall can infiltrate into the soil. Within the City, storm water is collected within the existing system of storm drainage collection, conveyance, and retention/detention basin facilities. Storm water that does not infiltrate back into the soil/groundwater is discharged directly or indirectly into receiving waters, the most notable of which are the Reclamation Ditch and the Salinas River. Most storm water generated in the City is ultimately discharged to the Reclamation Ditch. Stormwater generated in the southernmost portion of the City drains to the City’s Pump Station where the flows are either discharged to the Salinas River or diverted to Monterey One Water for treatment and re-use.

The Reclamation Ditch is an important flood control/storm water management feature that traverses the City. It is a man-made drainage channel system that was primarily constructed in the early 1900s to drain lands for agricultural purposes. Urban areas of the City have been, and increasingly continue to become more, dependent on the Reclamation Ditch system for flood protection. The upstream end of the Reclamation Ditch is in Smith Lake to the north and east of the City and the Reclamation Ditch drains through Heinz Lake to the east, and then through Carr Lake in the center of the City (CCRWQCB Fact Sheet 2012). Flood flows and storm water exits the downstream portion of Carr Lake through a continuation of the Reclamation Ditch. The Reclamation Ditch discharges into the Trembladero Slough, which then empties into the Monterey Bay.

Surface Water/Storm Water Conditions within Target Areas. Surface water and storm water conditions within the Target Areas are representative of those throughout areas in agricultural production. None of the Target Areas include areas of naturally occurring permanent surface water. However, Target Area V, Carr Lake, is within the boundary of Carr Lake. Therefore, this Target Area is subject to inundation during large storm events, as will be described in the discussion of the flood hazard setting below.

Land within the Target Areas is generally undeveloped and in active agricultural crop production. Under existing conditions, storm water with these areas generally either percolates to groundwater or migrates by sheet flow to the nearest improved or unimproved storm water facility. Most of the Target Areas contain agricultural drainage canals and ditches that are used to convey storm water to the nearest discharge location. Discharge points vary with the location of the Target Area. Receiving waters may directly or indirectly include local creeks, the Reclamation Ditch, the Salinas River, storm water percolation basins, and/or other facilities/features.
Surface Water and Groundwater Quality

Surface Water Quality. Water quality objectives for all waters in the State of California are established under applicable provisions of Section 303 of the Federal Clean Water Act (CWA) and the state Porter-Cologne Water Quality Control Act, as described in the Regulatory Setting below. The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards are charged with implementing CWA requirements within California. The Central Coast Regional Water Quality Control Board (CCRWQCB) has found that water quality and beneficial uses of water bodies in the vicinity of the City are impaired by various pollutants, including nitrate, ammonia, turbidity, enterococcus, E. coli, fecal coliform, pesticides, priority organics, PCBs, chlorpyrifos, diazinon, toxaphene, dieldrin, copper, low dissolved oxygen, temperature, pH, electrical conductivity, total dissolved solids, sodium, chloride, sediment toxicity, and unknown toxicity. In addition, the CWA section 303(d) list of impaired water bodies indicates that water bodies in the Salinas River watershed downstream of the City’s storm water discharges are impaired by the following pollutants: nutrients, nitrate, ammonia (un-ionized), chlorophyll-a, turbidity, total coliform, enterococcus, E. coli, fecal coliform, pesticides, chlorpyrifos; diazinon, low dissolved oxygen, pH, sediment toxicity, and unknown toxicity (CCRWCB Fact Sheet 2012).

Agricultural and Urban Sources of Surface Water Pollution. Agricultural practices impact watershed processes by altering runoff and flow characteristics of the landscape. Grading and vegetation removal affect the landscape’s capacity to hold soil and capture runoff and release it through infiltration and evapotranspiration. Stream channel alterations and riparian vegetation removal affects flow regimes, habitat functions, and the capacity of the watershed to attenuate pollutants. Irrigated agricultural practices further alter flow regimes through groundwater mining and release of excess irrigation water as non-storm water discharge. Groundwater mining also depletes aquifers and contributes to salt water intrusion into groundwater as described in Section 2.14, Water Supply.

Agricultural practices are severely degrading water quality, aquatic habitat, and several beneficial uses in the Salinas River Watershed. Storm water and non-storm water discharges from agricultural lands result in significant nitrate pollution in receiving waters and groundwater due to fertilizer use, as well as severe receiving water and sediment toxicity resulting from pesticide use and other practices. In addition, agricultural lands discharge sediment due to erosion.

While it is clear that the agricultural practices surrounding the City are significant sources of impacts to water quality and watershed processes, there is evidence that storm water discharges from the City’s storm water system are also significant sources of pollutants that cause or may be causing or threatening to cause or contribute to water quality impairment in the Reclamation Ditch and Salinas River. Urban development in the Salinas River Watershed creates new pollution sources as human population density increases and brings with it proportionately
higher levels of car emissions, car maintenance wastes, municipal sewage, pesticides, household hazardous wastes, pet wastes, trash, and other anthropogenic pollutants, which can either be washed or directly dumped into the City’s storm water system. As a result, the runoff leaving the developed portions of the City is significantly greater in pollutant load than would have been the pre-development runoff from natural, undeveloped and uncultivated land. Impervious surfaces collect these pollutants instead of allowing them to be filtered through vegetation or soil, and storm water transports them into the City’s storm water system. Pollutants can then be discharged from the City system into receiving waters, and eventually transported in the receiving waters to downstream habitats and into Monterey Bay. The CCRWQCB has found that there is a reasonable potential that municipal storm water discharges cause, or may cause or contribute to, exceedance of water quality standards.

Increased impervious surfaces and storm drainage improvements designed to remove storm water as quickly as possible result in runoff flow rates, volumes, and durations that are elevated above pre-developed levels if stormwater detention/retention or sufficient low-impact development (LID) best management practices (BMPs) are not provided. Increased runoff flow rate, volume, and duration impact important watershed processes, such as downstream flow regimes, stream channel stability, and groundwater recharge (CCRWQCB Fact Sheet, pp. 4-7).

As quoted in the SWMP, agricultural lands receive higher levels of known poisons than any other landscape in the state. Farm chemicals drain into ditch systems which ultimately empty into the Monterey Bay National Marine Sanctuary. Urban runoff is less significant in the Salinas Valley compared to runoff from farm sources (SWMP, p. 291).

**Groundwater Quality.** The lower Salinas River watershed overlies the Salinas Valley Groundwater Basin (SVGB). Groundwater is the source for most of the urban and agricultural water needs in the Salinas Valley. An ongoing imbalance between the rate of groundwater withdrawal and recharge has resulted in overdraft conditions in the SVGB that have allowed seawater from Monterey Bay to intrude inland approximately six miles into the 180-foot deep aquifer and approximately two miles into the 400-foot deep aquifer, the two main aquifers from which water supply is extracted. Aquifers intruded with seawater are largely unusable for either agricultural or municipal purposes. Historically, the stratified coastal aquifers were supplied freshwater by aquifer flows from the upper Salinas River Valley. At present, groundwater recharge is accomplished primarily through infiltration through the bed of the Salinas River. As a result, pollutants in City storm water that discharges to the Salinas River have the potential to enter groundwater. In addition, flow regimes associated with development (e.g., higher flows of shorter duration than occur under predevelopment conditions) have the potential to reduce groundwater recharge and increase seawater intrusion. Urbanization has altered groundwater recharge regimes through the construction of impermeable surfaces (CCRWQCB Fact Sheet, p. 5).
Further discussion regarding groundwater quality conditions related to seawater intrusion and to groundwater recharge can be found in Section 3.14, Water Supply.

**City of Salinas Municipal Storm Drainage System**

The City’s municipal storm drainage system consists of a series of gravity-drained pipes and inlets, and outfalls that flow to nearby receiving waters and detention basins. Each of these inlets and outfalls is coded with a unique number corresponding to the drainage basin it empties into, and is stored in the City’s GIS Watershed Characteristics data layers. As noted previously, storm water collected from most of the City is discharged either directly or indirectly into the Reclamation Ditch, but storm water from the southerly portion of the City is diverted and pumped into the Salinas River via a 66-inch corrugated metal outfall pipe.

Detention basins are implemented throughout the City as part of the City’s flood control and storm drainage system. Detention basins are utilized to provide temporary storage of storm water runoff to control peak discharge rates, provide a gradual release of stored water at controlled rates and encourage gravity settling of pollutants. Studies throughout California have shown that through designs that detain surface flow (for two-year flood events at a minimum), water is filtered as it percolates through soil layers, and many pollutants may be removed. Existing detention basins were designed to release post-project 100-year storm event runoff at no greater than the pre-project 10-yr peak discharge rate to maintain consistency with the Monterey County Water Resources Agency policy. It has however been determined that the flow control requirements plus peak flow matching for 25- and 100-year storm events provides better overall mitigation of impacts on drainage systems than detention sized to release post-project 100-year runoff at no greater than the pre-project 10-year peak discharge rate.

The City maintains the storm drainage system and makes improvements to its system through its capital improvements program (CIP). Drainage impact fees are collected from new development projects for this purpose. New development projects are required, per the City’s NPDES permit, to construct storm drainage facilities consistent with the City’s storm water design standards (SWDS). These SWDS call for peak flow matching up to the 100-year storm event, instead of over attenuation of the 100-year storm event, with the inclusion of the new requirements for more frequent storms.

With the exception of Target Area F, most of the remaining Target Areas are located adjacent to the existing city limits. Target Area V is located within the city limits. Existing municipal storm drainage infrastructure would be readily accessible to new development within these Target Areas. If and when any of the Target Areas are annexed to the City, municipal storm drainage improvements that meet City standards would have to be installed as part of new development projects proposed within them.
3.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

Flood Hazard Conditions

Flood Hazard Zones. Storm water runoff from the Gabilan Mountains poses one of the greatest flood risks to Salinas. Overflows from the Salinas River pose a lesser risk due to its distance from the city limits. Runoff from the Gabilan Mountains can pass quickly through cultivated farmlands, picking up sediments and exacerbating risks. The primary flood path from upstream areas draining the Gabilan Range is through several local creeks and through Carr Lake. For decades, Carr Lake has protected Salinas from flooding. However, extreme rainfall events have overtopped lake banks.

Carr Lake substantially contains flood events smaller than the 25-year flood. For larger storms, this is not the case. In 1998, Salinas experienced a 33-year flood event. Areas immediately surrounding Carr Lake, such as Sherwood Lake Mobile Home Park, experienced flooding. During the 1998 storm, waters breached U.S. Highway 101 and Natividad Creek. During a 100-year flood, these areas would also be inundated. Figure 15, Flood Hazard Zones, shows the extent of the 100-year flood hazard areas. A 100-year flood would significantly affect areas southeast and west of Carr Lake. Businesses and apartments neighboring the mobile home park would also be severely affected by the 100-year flood. Areas to the south and east of the City also have potential to be impacted by flood events, as do areas along Gabilan and Natividad creeks. Flood waters also carry pollutants that adversely affect receiving waters (SWMP, p. 287). Note that a significant portion of Carr Lake is also within a regulatory floodway. Development within regulatory floodways is restricted. Any fill placed in a floodway cannot increase the base flood elevation. Regulations regarding development within 100-year flood hazard areas and within regulatory floodways are included in the Municipal Code as described in the Regulatory Setting section below.

Flood hazards also exist along the several streams that drain the Gabilan Range, including Gabilan and Natividad creeks.

Tsunami, Seiche, and Mudflow Conditions. The City is protected from sea waves due to its inland location. However, the City’s tanks, reservoirs and seasonal lakes are enclosed bodies of water that are subject to potentially damaging oscillation, or seiches, during earthquakes. These hazards are dependent upon specific earthquake parameters, and the degree of damage due to seiches is likely to be minor (General Plan EIR, p. 5.10-2). None of the Target Areas contain significant slopes, so hazards from mudflows are negligible.

Regulatory Setting

Federal

Clean Water Act and State Porter-Cologne Water Quality Control Act. Water quality objectives for all waters in the State of California are established under applicable provisions of
Figure 15
Flood Hazard Zones


Salinas Economic Development Element Program EIR
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Section 303 of the Federal CWA and the state Porter-Cologne Water Quality Control Act. These laws seek to control the addition of point source and non-point source pollutants to surface waters and to protect the integrity of wetlands. Section 303 of the CWA requires states to adopt water quality standards for all surface waters. Section 304(a) requires the U.S. Environmental Protection Agency to publish water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in the water.

The Porter-Cologne Water Quality Control Act of 1969 established the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards. The new SWRCB merged the functions of two previous Boards: the State Water Quality Control Board and the State Water Rights Board. The former had its roots in the late 1940s, when legislators created a streamlined regulatory agency to address rising water quality problems with the state's explosive industrial and population growth. A water rights commission, which preceded the water rights board, was created in the early 1900s to arbitrate and resolve the state's water battles, which began during the 1849 Gold Rush.

The SWRCB and the nine Regional Water Quality Control Boards are responsible for assuring implementation and compliance with the provisions of the CWA and the Porter-Cologne Water Quality Control Act. The City falls within the Central Coast Regional Water Quality Control Board (Region 3) (CCRWQCB), which sets water quality standards, issues waste discharge requirements, determines compliance with those requirements, and takes enforcement action. The CCRWQCB developed a water quality control plan for the central coast basin that protects water quality through the designation of beneficial uses, establishment of water quality objectives. The Central Coast Water Quality Control Plan (Basin Plan) is utilized to show how the quality of the surface and ground waters in the Central Coast Region should be managed to provide the highest water quality reasonably possible.

**National Pollutant Discharge Elimination System.** Pursuant to the CWA as promulgated by the SWQCB and CCRWQCB, the NPDES program is designed to require municipal storm water systems to reduce the discharge of pollutants in storm water to the maximum extent practicable and to protect water quality and beneficial uses. The City is required to obtain NPDES permit coverage to comply with CWA requirements for water quality protection. The City has obtained coverage from the CCRWQCB per Order No. R3-2012-0005, NPDES Permit No. CA0049981 Waste Discharge Requirements for City of Salinas Municipal Storm Water Discharges, which guides post-construction storm water quality management.

NPDES permits are required for several categories of storm water dischargers, including for cities that operate storm water management systems (e.g. roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) that collect, convey, and discharge storm water to surface water bodies. Issued in five-year terms,
an NPDES permit usually contains components such as discharge prohibitions, effluent limitations, and necessary specifications and provisions to ensure proper treatment, storage, and disposal of storm water discharges.

All projects that create and/or replace greater than or equal to 2,000 square feet of impervious area are regulated and required to comply with the City’s SWDS. Developers must submit a Stormwater Control Plan (SWCP) and any required supporting documentation. All construction sites, regardless of impervious area creation/replacement or size, are required to implement source control BMPs (Best Management Practices). All regulated projects must implement Low Impact Development (LID) features for flow/volume control and/or water quality treatment. LID features are utilized to capture and treat runoff and promote infiltration where feasible. LID features utilized are measures such as rain barrels and cisterns, green roofs, permeable pavement, preserving undeveloped open space, and bio-treatment through rain gardens, bio-retention units, bio-swales, and planter/tree boxes.

Storm water from developed sites generally will be greater in volume and runoff velocity than under pre-development conditions where land is in a natural or semi-natural state. Changes in the rate or volume of storm water delivered into receiving waters can result in modification of downstream drainage courses (“hydromodification”), resulting in erosion and related sedimentation impacts. NPDES stipulations include a requirement that post-project runoff rates should not exceed pre-development runoff rates. This is intended to minimize potential for an increase in flow rates in receiving waters that can result in hydromodification.

Construction activity on projects that disturb one or more acres of soil, or less than one acre but are part of a larger common plan of development that in total disturbs one or more acre, must obtain coverage under the Construction General Permit for Discharges of Storm Water Associated with Construction Activity per NPDES requirements. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Program (SWPPP). A SWPPP should contain a site map(s) that shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography (both before and after construction), and drainage patterns across the project. The SWPPP must list measures that the City will use to minimize storm water runoff and how those measures will be placed within a project site. Additionally, the SWPPP must contain a visual monitoring program and sampling/analytical testing to be implemented, dependent on the project’s risk level. All construction projects which involve ground disturbance must provide erosion and sediment control plans. All sites, regardless of ground disturbance, must implement the City’s minimum construction site management BMPs (i.e. trash management, concrete washouts, etc)
Additionally, the SWPPP must contain a visual monitoring program and sample/analytical testing to be implemented, depending on the project’s risk level. All construction projects which involve ground disturbance must provide erosion and sediment control plans. All sites, regardless of ground disturbance, must comply with required construction site management BMPs (i.e. trash management, concrete washouts, etc.).

The City’s NPDES permit requires source control measures and erosion control, when applicable, to be implemented by any construction activity regardless of size. The City categorizes projects as high and low priority depending on various factors including size, proximity to creeks, height of slopes, etc.

Federal Emergency Management Agency Flood Insurance Program. The Federal Emergency Management Agency (FEMA) administers programs to address flood hazards. FEMA manages the National Flood Insurance Program for this purpose. The program provides federal flood insurance and federally financed loans for property owners in flood prone areas. For local property owners to qualify for federal flood insurance the flood hazard areas are identified by FEMA and the City requires implements a system of protective controls and emergency procedures, and distributes informational literature which ranks the City’s preparedness in FEMA’s rating system and provides discounts to residents with flood insurance. New development projects must be consistent with the protective controls. For this purpose, FEMA produces Flood Insurance Rate Maps (FIRMs) that define areas subject to inundation by flooding. The protective controls that must be implemented to reduce flood hazards and damage to property are generally incorporated onto a flood hazard management program and general plan policies of local jurisdictions. The tools assist cities in mitigating flooding hazards and implementing mitigation measures from private developments through land use planning and building permit requirements. The City’s flood hazard management program is described below.

State

California Department of Water Resources, Division of Safety of Dams. The State of California supervises all non-federal dams in California through the Dam Safety Program under the jurisdiction of the Department of Water Resources, Division of Safety of Dams. The Division of Safety of Dams engineers and engineering geologists review and approve plans and specifications for the design of dams and oversee their construction to ensure compliance with the approved plans and specifications. Reviews include site geology, seismic setting, site investigations, construction material evaluation, dam stability, hydrology, hydraulics, and structural review of appurtenant structures. In addition, the Division of Safety of Dams engineers inspect over 1,200 dams on a yearly schedule to ensure they are performing and being maintained in a safe manner.

The Nacimiento and San Antonio dams are located in south Monterey County. Their condition and management is the responsibility of the Division of Safety and Dams.
3.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

Local Plans and Regulations

Monterey County Water Resources Agency. The Monterey County Water Resources Agency (MCWRA) oversees the development and implementation of water quality, water supply, and flood control projects in Monterey County, including operation and maintenance of the Reclamation Ditch.

City of Salinas General Plan. The General Plan contains policies and implementation actions which address hydrology and water quality consistent with regulatory requirements, and whose implementation may serve as mitigation for significant impacts. These include the following:

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

Policy LU-8.1: Actively coordinate and work with MCWRA to provide and maintain necessary flood control facilities.

Policy LU-8.2: Apply appropriate development standards and fees to improve present drainage systems and provide adequate stormwater detention basins and sedimentation ponds with new construction.

Program LU-17: As a condition of project approval, new development to provide adequate storm water and flood management facilities to control direct and indirect erosion and discharges of pollutants and/or sediments so that “no net increase in runoff “occurs as a result of the proposed project. In order to determine the facility and Best Management Practices (BMP) needs, the City may will require, when necessary, a hydrological/drainage analysis to be performed by a certified and City-approved engineer, with the cost of said analysis the responsibility of the project applicant.

Policy LU-8.3: Require new development, to the extent feasible, to provide flood control facilities that are visually attractive and ecologically beneficial, and require on-going maintenance of the facilities by the development through a maintenance district.

City of Salinas Stormwater Development Standards. Point source storm water discharges to surface waters are generally controlled through NPDES waste discharge requirements. The City’s NPDES Permit, Order No. R3-2012-0005, NPDES Permit No. CA 0049981, Waste Discharge Requirements for City of Salinas, Municipal Storm Water Discharges became effective on June 17, 2012. The permit requires compliance with receiving water limitations with adherence to water quality standards, and implementation of Best Management Practices
(BMPs) to reduce storm water pollutant discharges and protect water quality and beneficial uses. Best management practices to reduce pollutants in storm water discharges include: erosion control, sediment control, and construction site waste management practices; good housekeeping practices to control pollutants, promote waste management practices, and implement control practices to keep pollutants away from the storm drainage system; requirements to preserve pre-development hydrologic and pollutant conditions; requirements for development planning; and watershed characterization.

The City has developed storm water management ordinances and programs to implement storm water management regulations pursuant to its NPDES permit. These are embedded in the Stormwater Management Plans SWMP and in the SWDS. The SWMP includes all of the required and recommended control programs for municipal facilities, industrial facilities, and commercial facilities. The SWMP describes the minimum procedures and practices the City uses to reduce pollutants in storm water and non-storm water discharges. It outlines procedures and responsibilities for protecting water quality, including the selection and implementation of BMP practices.

The City adopted the SWDS to assist project applicants with storm water management requirements and criteria set forth by the regional board as part of the City’s NPDES permit. The SWDS require in part that new sources of storm water be managed to ensure that the rate and volume of discharges to existing storm drainage facilities under post-development conditions does not exceed the pre-existing rate and volume of discharge.

The SWDS require the evaluation of post-construction storm water requirements that are based upon the creation and/or replacement of impervious and/or managed turf surfaces. To achieve consistency with the SWDS, LID storm water treatment measures, such as storm water planters, bioswales, permeable pavements, and infiltration basins, must be incorporated into new development, as must other BMP practices. The SWDS describe the process for early consultation with the City to ensure that requirements are being met as part of the initial project design process. Final approval of individual projects is contingent on the City’s review and approval of project plans to ensure that they meet standards contained in the SWDS.

The City’s 2013 SWDS affect all new development which creates or disturbs impervious surface areas greater than 2,000 square feet, including new roadways.

The CCRWQB requires that LID be applied to new and redevelopment projects to the maximum extent practicable as a way to minimize the impacts of urban runoff on receiving waters and to promote healthy watersheds. This can be achieved by the use of BMPs, which are any procedure, activity, facility or device that helps to achieve storm water management objectives at a designated site. These can include small on-site treatment control BMPs that are integrated into the site layout, landscaping, and drainage design of the development. The City’s SWDS are outlined in Chapter 29 of the City’s Municipal Code.
**City of Salinas Municipal Code.** Chapter 29 of the Municipal Code identified regulations that support implementation of the City's NPDES permit requirements. Key regulations address discharge prohibitions, illicit discharges, reduction of pollutants and best management practices, and spill prevention. Inspection and enforcement regulations are also provided.

Flood hazard information and flood hazard prevention regulations are contained in Chapter 9, Article VI of the Municipal Code. New development in the City must be consistent with the related development regulations. Among many topics, the regulations address definition of flood hazard areas, procedures for identifying flood hazards for specific sites and projects, and standards of construction that apply to development proposed within flood hazard areas. Standards of construction include anchoring buildings and improvements, use of flood resistance construction materials and methods, and elevating and floodproofing new structures. These standards are found in Division III - Flood Hazard Reduction, Section 9-55.1 - Standards of Construction, and in Section 9-55.3 - Standards for Subdivisions and Other Proposed Development. The City's designated floodplain administrator is required to review all developments proposed within flood hazard areas for conformance with the flood hazard regulations.

**City of Salinas Standard Specifications, Design Standards, and Standard Plans.** The City of Salinas Development and Engineering Services Department follows the guidelines presented in the City’s Standard Specifications, Design Standards, and Standard Plans – 2008 Edition for design and construction of development and improvement projects within the City. To minimize soil erosion and protect surface water quality during project construction phase, development plans within the City must also comply with the guidelines presented in Appendix A of this document - Standards to Control Excavations, Cuts, Fills, Clearing, Grading, Erosion, and Sediment. Section 3, General Provisions. Subsection (a) and (d) are particularly relevant to preventing erosion and water quality impacts:

(a) No person shall cause or allow the persistence of a condition on any site that could cause accelerated erosion. Accelerated erosion shall be controlled and/or prevented by Permitee or the property owner by using measures outlined in subsequent sections as applicable, especially when work is on geologically unstable areas, on slopes above twenty percent 20%, and/or on soils rated a severe erosion hazard. Additional measures may be necessary and may be specifically required by the City Engineer.

(e) The property owner and the person(s) doing or causing or directing the grading shall put into effect and maintain all Best Management Practices necessary to protect adjacent watercourses and public or private property from damage by erosion, flooding, or deposition of mud or
debris originating from the site. Precautionary measures shall include provisions for properly designed erosion and sediment control measures, so that downstream properties are not affected by upstream erosion or sediment transport by storm water. If, in the opinion of the City Engineer, grading activities result in a need for post-construction runoff control measures, then such measures, (including Low Impact Development devices/systems), shall be required to be installed, as specified in the City of Salinas Storm Water Development Standards.

The standards reiterate the NPDES permit requirements and requirements for a SWPPP and implementing BMPs as required consistent with the City’s NPDES permit.

**Proposed EDE Policies**

The EDE contains policies and implementation actions which address hydrology and water quality issues. These include the following:

**Action I-3.1.5:** Consider investing in and requiring development projects to invest in green infrastructure practices for multi-family residential, commercial, and industrial projects, particularly to manage stormwater at a local level by using broad municipal level stormwater solutions, creating long-term benefits, and reducing life-cycle and maintenance costs.

**Policy ED-I-3.2:** Redesign existing wastewater and storm drainage infrastructure systems, including broad municipal level wastewater and stormwater solutions for water reuse, and ensure that outdated infrastructure is upgraded to accommodate existing and future businesses.

**Standards of Significance**

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of hydrology and water quality, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on these subjects, or indeed on any subject addressed in the checklist. *(Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.*) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” *(Ibid.*) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:
3.0 Environmental Setting, Impacts and Mitigation Measures

- Violate any water quality standards or waste discharge requirements;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface run-off in a manner which would result in flooding on- or off-site;
- Create or contribute run-off water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted run-off;
- Otherwise substantially degrade water quality;
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows; or
- Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

The Appendix G questions on the subject of hydrology and water quality also give rise to additional thresholds that are not relevant to the proposed project. Under these thresholds, significant effects would occur if a proposed project would:

- Place housing within a 100-year flood hazard area as mapped on Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map; or
- Cause inundation by seiche, tsunami, or mudflow.

As noted, neither one of these additional thresholds is relevant to the proposed project. The proposed project does not include residential development, so no further discussion of the possibility of putting housing in a 100-year flood hazard area is necessary. Similarly, as described in the Environmental Setting section above, risk from inundation by seiche, tsunami, or mudflow within Target Areas is low. So no further discussion of this issue is necessary either.

Analysis, Impacts, and Mitigation

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.
**IMPACT: CHANGES TO EXISTING DRAINAGE PATTERNS WITHIN TARGET LEADING TO EROSION, DEGRATED SURFACE AND GROUNDWATER QUALITY, AND VIOLATION OF WATER QUALITY STANDARDS (LESS THAN SIGNIFICANT)**

**Construction Phase Water Quality Impacts/Regulatory Requirements**

Spills of oil, grease, or related pollutants can result from the following: soil disturbance associated with site preparation, grading and construction activities; delivery, handling and storage of construction materials and wastes; and refueling parked construction equipment. Improper handling, storage, or disposal of fuels and materials or improper cleaning of machinery also are potential pollutant sources associated with construction activities. These activities have potential to cause water quality degradation if eroded soil or other pollutants are carried by storm water into the existing storm drainage system, drainage channels, and/or directly into downstream water bodies. Construction phase water quality degradation can damage aquatic ecosystem health; and the deposition of sediment within surface water and creek channels can adversely modify their function while causing additional erosion that exacerbates water quality degradation. Future development within Target Areas may involve many, if not all, of these activities.

Individual projects within the Target Areas will be required to comply with the City’s NPDES Permit for Discharges of Storm Water Associated with Construction Activities. As described in the Regulatory Setting section above, this will involve preparing a SWPPP, or erosion and sediment control plan, depending on the area of disturbance, prior to beginning construction and implementing the SWPPP, or erosion and sediment control plan, during construction. By implementing BMPs included in the SWPPP or erosion and sediment control plan, individual development projects will have a less-than-significant impact on surface and groundwater water quality from erosion/sedimentation or from potential violation of water quality standards.

**Post-Construction Water Quality Effects/Regulatory Requirements**

Urban development is widely regarded as a leading cause of surface water pollution resulting from altering watershed hydrology and introducing urban pollutants. Development that would be possible within each Target Area would alter existing storm water drainage conditions by replacing largely undeveloped agricultural land with impervious surfaces such as parking lots, building rooftops, and roadways. The change in surface conditions would result in a substantial increase in storm water runoff from sites where a significant portion of storm water currently percolates though exposed soil back to the groundwater basin. Urban development would also reduce the natural capacity of soils and vegetation to remove pollutants contained in storm water. Further, unless properly managed and pre-treated, storm water runoff from new urban development sites will be greater in volume and velocity than under existing conditions. Changes
in the rate or volume of storm water delivered into receiving waters can result in hydromodification of downstream drainage courses, resulting in further erosion and related water quality degradation.

Urban development generally introduces pollutants such as oil and grease and natural and non-natural debris than can be carried in storm water runoff and delivered directly or indirectly to receiving waters. Storm water that travels through landscaped or other pervious developed portions of a development site can also be contaminated with pesticides, fertilizers, and other materials. Where contaminated storm water is delivered into a regulated storm drainage system and then discharged directly or indirectly into a surface water body, water quality degradation can occur.

All of these factors have potential to degrade water quality in receiving waters such as the Reclamation Ditch and Salinas River, and ultimately, the Monterey Bay National Marine Sanctuary. Violation of the City's NPDES permit conditions could result if actions are not implemented to avoid or reduce sources of water quality degradation. As described below, such measures are required, and their implementation would assure that water quality impacts are minimized.

Future development within the Target Areas must implement water quality control measures consistent with the post-construction water quality criteria contained in the City's NPDES requirements. The City's SWDS are the primary implementation tool for ensuring that new development meets the water quality criteria. Developers of individual projects within the Target Areas must submit a storm water control plan for review and approval to demonstrate how post-construction water quality criteria will be met through implementing water quality control measures defined in the SWDS. Storm water control plans must identify measures for site design, storm water runoff source control, runoff reduction, storm water treatment, and baseline hydromodification management site specific measures that will be incorporated into individual projects. Examples include, but are not limited to, the following: planting and preserving healthy trees; rerouting of rooftop drainage pipes to drain rainwater to rain barrels, cisterns, or permeable areas instead of the storm sewer; permeable pavement that allows runoff to pass through it, thereby reducing the runoff from a site and surrounding areas and filtering pollutants; green roofs; vegetated swales designed specifically to treat and attenuate storm water runoff; and rain barrels and cisterns that collects and stores storm water runoff from a roof or other impervious surface.

Site design measures must be included to reduce storm water runoff volumes and to ensure that post-project rates of storm water discharge from a site or new roadway do not exceed pre-project runoff rates so that downstream hydromodification potential is reduced.
Source control measures generally address actions to avoid or minimize introduction of pollutants into storm water. Examples of pollutant sources to which management measures are to be applied include, but are not limited to, the following: accidental spills or leaks; parking/storage areas; indoor and structural pest control; landscaping/outdoor pesticide use; industrial processes; and fuel dispensing areas. Low impact development features designed to reduce runoff, treat storm water, and provide baseline hydromodification management must also be included to reduce runoff volumes and pre-treat storm water to improve its quality.

The SWDS explicitly require project proponents to conduct early consultation with the City to ensure that storm water management criteria contained in the SWDS are considered and incorporated into the their project designs. The SWDS require integration of measures into a project design from its earliest conceptual stages. Individual project developers must prepare a preliminary storm water control plan for review by the City for this purpose. In many cases, the design of new projects will be significantly affected by the need to incorporate storm water management measures such as biofiltration treatment areas and bioretention facilities. A conceptual storm water control plan is then required prior to receiving a “planning level approval”. The SWDS requires that a final storm water control plan, when applicable, be provided and approved before a grading permit is issued by the City. Based on this process, the storm water design elements of new projects are distinct from mitigation measures that otherwise may be required to reduce residual impacts that are not avoided or substantially reduced through project design.

Provided that new development within the Target Areas is designed and implemented consistent with NPDES and SWDS requirements as is required, post-construction impacts on surface and groundwater quality from erosion/sedimentation or violation of water quality standards due to changes to existing drainage patterns Similarly, impacts from changes to existing drainage patterns and related contribution of urban pollutants indirectly discharged into the Salinas River, which recharges the Salinas Valley Groundwater Basin would be less than significant and NPDES waste discharge requirements would not be violated.

**IMPACT: GENERATION OF STORM WATER RUNOFF FROM TARGET AREAS WITH POTENTIAL TO RESULT IN LOCALIZED FLOODING (LESS THAN SIGNIFICANT)**

As described in the previous analysis of potential water quality impacts, development of the Target Areas will introduce substantial areas of impervious surface. Existing pervious agricultural soil cover would be converted to impervious surfaces. New development would result in significant increases in impervious area that in turn would result in substantial increases in the volume and rate of storm water runoff relative to existing conditions.
The Target Areas are currently largely in agricultural use. They do not contain municipal storm drainage infrastructure designed to City standards. For urban development within the Target Areas other than Target Area V to proceed, they must first be annexed to the City. Upon annexation, pursuant to General Plan implementation program LU-17, and policy LU-8.2, developers of individual projects must install storm drainage facilities (collection, conveyance and disposal) to meet the demand they create due to their generation of increased storm water runoff. Additionally, the City collects storm fees for all construction requiring a building permit. The fees are used in part to assure that the storm drainage infrastructure is maintained and improved to provide the capacity needed to accommodate existing and new development.

As described in the prior discussion of water quality impacts, new development within the Target Areas must comply with the City’s SWDS. A key criterion in the SWDS stipulates that the rate of runoff discharge from individual development sites must not exceed the pre-existing rate of discharge. The purpose is to reduce potential for hydromodification (increased erosion within receiving waters due to an increase in the rate of storm water flow within the receiving water. New development must include on-site storm water control measures designed to achieve a no net increase in rate of storm water discharge relative to pre-existing conditions. This requirement is of benefit in reducing the potential that runoff from new development could exceed the capacity of storm drainage facilities and contribute to off-site flood hazards.

The City will review storm drainage plans for individual future projects within Target Areas for conformance with City storm drainage facility design standards and SWDS requirements prior to approving initial land use entitlements. With this action and payment of storm drainage fees as required, impacts from localized flooding under post-development conditions due to changes in existing drainage patterns or generation of surface water runoff that exceeds capacity of existing or planned storm water drainage systems would be less than significant.

**IMPACT: FLOOD HAZARDS RESULTING FROM DEVELOPMENT WITHIN TARGET AREAS F AND V (LESS THAN SIGNIFICANT)**

Based on review of Figure 15, Flood Hazard Zones, Target Areas F and V are located within flood hazard zones as mapped by FEMA. Target Area F is within flood hazard Zone A. Zone A defines areas subject to inundation by the one-percent annual chance flood event (100-year flood), but where the extent or depth of flooding has not been determined by detailed methods. Target Area V is located entirely within flood hazard Zone AE. Zone AE describes areas with a one percent annual chance of flooding where, in most instances, base flood elevations derived from detailed analyses are known. Target Area V is also within a regulatory floodway as is much of Carr Lake. Impacts to public safety and/or improvements constructed within Zone A and Zone AE are possible if future development is not designed to minimize exposure to or resist damage from flood hazards.
For flood hazard impacts to be avoided or reduced to less than significant, new development in Target Areas F and V must be designed consistent with applicable flood hazard regulations/development standards as defined in Municipal Code Chapter 9, Article VI. Among those standards is the requirement that in Zone A, finished floors of habitable structures must be elevated a minimum of two feet above the base flood elevation as determined through analysis required pursuant to other standards in the Article VI. Because the base flood elevation in Zone A may not yet have been precisely defined by FEMA, applicants for future development within Target Area F may be required to model the base flood elevation pursuant to guidance provided in Article VI. If fill is required to elevate structures above the base flood elevation, an analysis of how such fill affects flood elevations downstream of such development may also be required. Measures to avoid or minimize loss of flood storage capacity will be required. Within Zone AE, finished floor elevations must also be a minimum of two feet above the base flood elevation.

Development within Target Area V could be constrained by the fact that it is located within a regulatory floodway. The regulatory requirements that apply to development within a regulatory floodway are stringent. This fact, in part, informed development of one of the project alternatives included in Section 6.3, Alternatives Analyzed. Please refer to that section for discussion of an alternative to the relocation of a portion of Target Area V outside of the regulatory floodway.

Through the development permit review process, the City’s floodplain administrator will review future development plans for projects within Target Areas F and V for conformance with the City’s Floodplain Ordinance. Required consistency of new development with the regulations will ensure that such development will not impede or redirect flood flows or expose people or structures to flood-related risks. As such flood-related hazards are less than significant.

**IMPACT: PROPERTY DAMAGE OR RISK FROM DEVELOPMENT LOCATED IN A DAM INUNDATION ZONE (LESS THAN SIGNIFICANT)**

Portions of the City could be inundated in the event of a failure of the Nacimiento and San Antonio dams. According to the City’s Multihazards Emergency Plan, in the event that one of these dams were to fail during a normal wet river flow, approximately two thirds of the City would be flooded within 22 hours after failure. The 2007 County General Plan EIR concluded that potential for severe inundation in the Salinas Valley should either Nacimiento or San Antonio dams fail is unlikely. The City is required by Section 8589.5 of the California Government Code to have emergency procedures for the evacuation and control of populated areas within the limits of inundation below dams. In addition, real estate disclosure upon sale or transfer of property in the inundation area is required under Section 1103 of the Civil Code.

All dams in California must be periodically inspected for safety to ensure that potential risks from dam failure during a seismic event are minimized. Nacimiento and San Antonio dams are
routinely inspected, monitored, and studied by the Department of Water Resource’s Division of Safety of Dams to verify their integrity and safety. This fact minimizes risk to property and public safety within the Target. Therefore, potential impacts would be less than significant.

This particular impact is outside the scope of CEQA, as it is concerned with the potential of existing environmental hazards to adversely affect future project users. In *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 (“CBIA”), the California Supreme Court held that “agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents.” (Italics added.) The court did not hold that CEQA never requires consideration of the effects of existing environmental conditions on the future occupants or users of a proposed project. But the circumstances in which such conditions may be considered are narrow: “when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project’s impact on the environment—and not the environment's impact on the project—that compels an evaluation of how future residents or users could be affected by exacerbated conditions.” (Id. at pp. 377-378, italics added.)

In light of the CBIA decision, the City is not required by CEQA to address the extent to which existing risks associated with Nacimiento and San Antonio dams could affect future occupants or users of lands that might be developed in the future. Future development under the proposed project does not create any risk of exacerbating whatever risks exist with respect to these two facilities. Thus, readers should treat the discussion of this impact on future project residents and users as being beyond the scope of CEQA. The discussion has been provided to the public on a voluntary basis in the interests of full disclosure.

### 3.10 Noise

The section of the EIR examines changes in the noise environment that could result from new sources of noise created by the proposed project. Effects of noise on the proposed uses, as well as on noise sensitive land uses located along roadways and adjacent to the Target Areas are also evaluated. Noise effects are evaluated at a level commensurate with the project description. Information in this section is derived from a variety of sources including:

- *City of Salinas General Plan* (Cotton/Bridges/Associates 2002);
- *City of Salinas General Plan Final Program EIR* (Cotton/Bridges/Associates 2002); and
- *City of Salinas General Plan Economic Development Element Draft Noise and Vibration Assessment Salinas, California* (Illingworth & Rodkin 2017) (included in Appendix H on CD on the inside back cover of this EIR).
NOP responses that addressed noise issues were received from Building Healthy Communities, which commented on noise associated with proposed expressways shown in the EDE as a future strategy. The additional roadways have since been removed from the project description.

**Environmental Setting**

**Acoustic Fundamentals**

Prior to discussing noise effects of the proposed project, it is important to review the fundamental characteristics of noise and related terminology. Noise may be defined as unwanted sound. Noise is usually objectionable because it is disturbing or annoying. Noise is generated by many mobile sources (e.g., automobiles, trucks, and airplanes) and stationary sources (e.g., construction sites, machinery, and industrial operations).

Airborne sound is a rapid fluctuation of air pressure above and below atmospheric pressure. Sound levels are usually measured and expressed in decibels (dB) with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds we hear in our normal environment do not consist of a single frequency, but rather a broad range of frequencies. As humans do not have perfect hearing, environmental sound measuring instruments have an electrical filter built in so that the instrument's detector replicates human hearing. This filter is called the "A-weighting" network and filters out low and very high frequencies. The most common method of characterizing sound in California is the A-weighted sound level or dBA. Although the A-weighted noise level may adequately indicate the level of noise at any instant in time, community noise levels vary continuously. Most environmental noise includes a mixture of noise from distant sources that create a relatively steady background noise from which no particular source is identifiable. To describe the time-varying character of environmental noise, the statistical noise descriptors, $L_{eq}$, $L_{dn}$, $L_{50}$, and $L_{90}$ are commonly used.

The three most commonly used descriptors are $L_{eq}$, DNL (or “$L_{dn}$”), and CNEL. The energy-equivalent noise level, $L_{eq}$, is a measure of the average energy content (intensity) of noise over any given period. The day-night average noise level, DNL, is the 24-hour average of the noise intensity, with a 10-dBA “penalty” added for nighttime noise (10 PM to 7 AM) to account for the greater sensitivity to noise during this period. CNEL, the community equivalent noise level, is similar to DNL but adds an additional 5-dBA “penalty” for night-time noise. Common noise level descriptors are summarized in Table 1 of the noise analysis report in Appendix H.

**Effects of Noise on People**

The human response to environmental noise is subjective and varies considerably from individual to individual. Table 2 in the noise analysis report in Appendix H shows typical noise levels generated by typical noise sources.
Unfortunately, there is no completely satisfactory way to measure the subjective effects of noise or the corresponding reactions of annoyance and dissatisfaction. This is primarily because of the wide variation in individual thresholds of annoyance and habituation to noise over differing individual experiences with noise. Thus, an important way of determining a person’s subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted: the so-called “ambient” noise environment. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will be judged.

Regarding increases in A-weighted noise levels, the U.S. Environmental Protection Agency (EPA) has determined the following relationships that will be helpful in understanding this analysis:

- Except in carefully controlled laboratory experiments, 1 dB change cannot be perceived by humans;
- Outside of the laboratory, a 3 dB change is considered a just-perceivable difference;
- A change in level of at least 5 dB is required before any noticeable change in community response would be expected. An increase of 5 dB is typically considered substantial; and
- A 10 dB change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

**Vibrational Noise**

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Sources of ground vibration include large trucks and rail operations, and some construction activities such as pile driving and jackhammering. Several different methods are typically used to quantify vibration amplitude. One method is the peak particle velocity (PPV). The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. In this report, a PPV descriptor with units of inches/second is used to evaluate construction-generated vibration for building damage and human complaints. Table 32, Responses to Vibration, presents the human response and the structural effects that can result from continuous vibration levels.

The two primary concerns with construction-induced vibration – the potential to damage a structure and the potential to interfere with the enjoyment of life – are evaluated against different vibration limits. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second PPV. Human perception to vibration varies with the individual, and is a function of physical setting and the type of vibration. Persons exposed to elevated ambient vibration levels, such as people in an urban environment, may tolerate a higher vibration level.
Table 32  Responses to Vibration

<table>
<thead>
<tr>
<th>Velocity Level PPV (in/sec)</th>
<th>Human Reaction</th>
<th>Effects on Buildings</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.01</td>
<td>Barely perceptible</td>
<td>No effect</td>
</tr>
<tr>
<td>0.04</td>
<td>Distinctly perceptible</td>
<td>Vibration unlikely to cause damage of any type to any structure</td>
</tr>
<tr>
<td>0.08</td>
<td>Distinctly perceptible to strongly perceptible</td>
<td>Recommended upper level of the vibration to which ruins and ancient monuments should be subjected</td>
</tr>
<tr>
<td>0.1</td>
<td>Strongly perceptible</td>
<td>Virtually no risk of damage to normal buildings</td>
</tr>
<tr>
<td>0.3</td>
<td>Strongly perceptible to severe</td>
<td>Threshold at which there is a risk of damage to older residential dwellings such as plastered walls or ceilings</td>
</tr>
<tr>
<td>0.5</td>
<td>Severe – Vibrations considered unpleasant</td>
<td>Threshold at which there is a risk of damage to newer residential structures</td>
</tr>
</tbody>
</table>

Source: Illingworth and Rodkin 2017

Structural damage can be classified as cosmetic only, such as minor cracking of building elements, or may be much more serious, and threaten the integrity of the building. Safe vibration limits that can be applied to assess the potential for damaging a structure vary by researcher, and there is no general consensus as to what amount of vibration may pose a threat for structural damage to the building. Construction-induced vibration that can be detrimental to the building is very rare, and has only been observed in instances where the structure is in a high state of disrepair and the construction activity occurs immediately adjacent to the structure.

Overview of Existing Noise Conditions

Existing Noise Levels within and Near the Target Areas. To establish a baseline against which changes in the noise environment generated by the proposed project can be measured, measurements of ambient (existing) noise conditions in the locations of the proposed Target Areas were conducted as part of the noise analysis report.

Long-term and short-term noise level measurements were conducted from November 30 through December 2, 2016 and consisted of eight long-term noise measurements (LT-1 through LT-8) and eight short-term measurements (ST-1 through ST-8). The noise measurement locations are shown in Figure 16, Noise Measurement Locations.

Existing Roadway Noise. Based on the results of the ambient noise measurements, transportation-related noise sources are the primary contributor to the existing noise
environment at each of the Target Areas. To determine existing noise levels along these roads as a baseline against which project generated changes can be assessed, a noise analysis model was utilized. Major transportation corridors that traverse near the Target Areas include U.S. Highway 101 and arterial roadways, such as North Davis Road, State Route 68/South Main Street, and Blanco Road. Table 8 in the noise analysis report summarizes the existing noise levels calculated at a reference distance of 75 feet from the center of the near travel lane for the major roadways in Salinas. Noise level contours along these roadways are illustrated in Figure 2 of the noise analysis report.

**Sensitive Receptors and Locations**

Some land uses are more sensitive to environmental noise than others due to the types of activities that occur and the degree of insulation from the noise. Noise sensitive receptors typically include residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, and parks for passive use. Impacts of noise are generally considered in terms of effects on noise sensitive receptors. Under existing conditions, residences are the primary noise sensitive uses in areas near the Target Areas. Target Area V is the only Target Area without residential uses located adjacent to it. Residential areas are located near Target Areas L2 and N, but are separated from the Target Areas by major roadways (U.S. Highway 101 and East Blanco Road, respectively). Gavilan Middle School is located adjacent to a portion of Target Area K.

**Airport Area of Influence**

The Salinas Municipal Airport is located in the southeastern portion of the City. Figure 5.6-3 in the General Plan EIR depicts the Salinas Municipal Airport Area of Influence. None of the Target Areas are located within the Area of Influence. Please refer to Regulatory Setting section below for more information about land use compatibility standards and development regulations that apply within the Area of Influence.

**Regulatory Setting**

**California State Building Code**

The State Building Code, Title 24, Part 2 of the State of California Code of Regulations establishes uniform minimum noise insulation performance standards to protect persons within new buildings which house people, including hotels, motels, dormitories, apartment houses and dwellings other than single-family dwellings. Title 24 mandates that interior noise levels attributable to exterior sources shall not exceed 45 dB L\text{dn} or CNEL in any habitable room.
Noise Measurement Locations

Salinas Economic Development Element Program EIR
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Title 24 also mandates that, for structures containing noise-sensitive uses to be located where the $L_{dn}$ or CNEL exceeds 60 dB, an acoustical analysis must be prepared to identify mechanisms for limiting exterior noise to the prescribed allowable interior levels. If the interior allowable noise levels are met by requiring that windows be kept closed, the design for the structure must also specify a ventilation or air conditioning system to provide a habitable interior environment.

In 2016, the State of California established exterior sound transmission control standards for new non-residential buildings as set forth in the 2016 California Green Building Standards Code (CALGreen) as Part 11 of Title 24. The sections that pertain to this project are as follows:

5.507.4.1 Exterior noise transmission, prescriptive method. Wall and roof-ceiling assemblies exposed to the noise source making up the building envelope shall meet a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 when the building falls within the 65 dBA $L_{dn}$ noise contour of a freeway or expressway, railroad, industrial source or fixed-guideway noise source, as determined by the local general plan noise element.

5.507.4.2 Performance method. For buildings located, as defined by Section 5.507.4.1, wall and roof-ceiling assemblies exposed to the noise source making up the building envelope shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly equivalent noise level ($L_{eq} (1-hr)$) of 50 dBA in occupied areas during any hour of operation.

**Airport Land Use Planning**

The Public Utilities Code contains provisions governing Airport Land Use Commissions (ALUCs). The purpose of these statutes is “to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.” (Pub. Util. Code, § 21670, subd. (a)(2).) The role of an ALUC is to “formulate an airport land use compatibility plan that will provide for the orderly growth of each public airport and the area surrounding the airport within the jurisdiction of the commission, and will safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general.” (Pub. Util. Code, § 21675, subd. (a).) The membership of each ALUC must include at least two aviation experts. (Pub. Util. Code, §§ 21670, subd. (b)(3), 21670.1, subd. (b).)
Where a county, such as Monterey County, has established an ALUC, the airport land use compatibility plan that the ALUC prepares “shall be guided by information” in the “Airport Land Use Planning Handbook” published by the Division of Aeronautics within California Department of Transportation (Caltrans); and “local agencies shall be guided by the height, use, noise, safety, and density criteria ... established by [the Handbook]” (Pub.Util.Code, § 21674.7, subds. (a), (b)).

In preparing an EIR for a project within airport land use plan boundaries or, in the absence of such a plan, within two nautical miles of a public airport or public use airport, a lead agency must use the Handbook as a technical resource for assessing airport safety hazards and noise problems. (Pub. Resources Code, § 21096, subd. (a); CEQA Guidelines, § 15154, subd. (a).)

In California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, 377, 391, in which the California Supreme Court held generally that “agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents,” the court recognized that Public Resource Code section 21096 created an exception to this rule. Thus, projects in areas subject to section 21096 are required to consider the effects of existing airport noise sources on the potential future residents and users of proposed projects.

**Local Plans and Regulations**

**City of Salinas General Plan.** The General Plan contains policies and programs to achieve and maintain noise levels compatible with various types of land uses. The policies and programs emphasize the need to control noise through land use regulation, as well as enforcement of other City ordinances. Three major issues related to noise are addressed in the Noise Element: 1) avoiding the negative impacts of noise through the use of land use planning and noise reduction measures; 2) minimizing the impact of transportation-related noise; and 3) minimizing the impact of non-transportation-related noise. In addition, the Land Use Element includes a policy that addresses public health from airport operations (e.g. noise).

The following goals and policies are set forth in the General Plan:

**Policy LU-12.2:** Review development proposals within areas affected by the operation of the airport to ensure airport and land use compatibility, protect the public safety, and allow for continued aviation operations. This includes minimizing residential population increases within the 55 decibel Community Noise Equivalent Level contour.

**Policy N-1.2:** Require the inclusion of noise-reducing design features in development and reuse/revitalization project to address the impact of noise on residential development.
Policy N-1.3: Locate only urban development within the Salinas Municipal Airport “area of influence” that is compatible with the airport noise environment and meets the guidelines of the Caltrans handbook.

Policy N-1.4: Ensure proposed development meets Title 24 Noise Insulation Standards for construction.

Policy N-2.1: Ensure noise impacts generated by vehicular sources are minimized through the use of noise control measures (e.g., earthen berms, landscaped walls, lowered streets).

Policy N-2.2: Control truck traffic routing to reduce transportation-related noise impacts on sensitive land uses.

Policy N-2.3: Ensure new development within the vicinity of the airport does not result in a land use/noise compatibility conflict or hazard.

Policy N-3.1: Enforce the City of Salinas Noise Ordinance to ensure stationary noise sources and noise emanating from construction activities, private developments/residences and special events are minimized.

The General Plan also includes an Implementation Program, which provides actions to implement the adopted policies and plans identified in the General Plan elements. These programs are discussed as follows:

N-1 - Review Development Projects: Review discretionary development proposals for potential on- and off-site stationary and vehicular noise impacts per the CEQA. Any proposed development located within a 60 dB or higher noise contour (per Figures N-1 and N-2 of the City’s General Plan) shall be reviewed for potential noise impacts and compliance with the noise and land use compatibility standards. The thresholds established in the Zoning Ordinance, Noise Ordinance, the Noise Contours Maps (Figures N-1 and N-2 of the City’s General Plan), and Tables 3 and 4 of the Noise Element will be used to determine the significance of impacts. If potential impacts are identified, mitigation in the form of noise reduction designs/structures will be required to reduce the impact to a level less than significant. If the impact cannot be reduced to a level less than significant or avoided with accepted noise reduction methods, the proposed project will be determined “Clearly Unacceptable” and will not be approved.
N-2 - Minimize Commercial/Industrial Noise: Limit delivery or service hours for stores and businesses with loading areas, docks, or trash bins that front, side, border, or gain access on driveways next to residential and other noise sensitive areas. Only approve exceptions if full compliance with the nighttime limits of the noise regulations is achieved.

N-3 - Minimize Construction Noise: Require all construction activity to comply with the limits (maximum noise levels, hours and days of allowed activity) established in the City noise regulations (Title 24 California Code of Regulations, Zoning Ordinance and Chapter 21A of the Municipal Code).

N-4 - Salinas Municipal Airport Master Plan: Upon any update of the Salinas Municipal Airport Master Plan, the County Airport Land Use Plan, or California Airport Land Use Planning Handbook, review and revise as necessary Table 7, Figure N-2 and the goals, policies, and noise plan within the General Plan Noise Element to correspond with the updated Airport Master Plan.

N-5 - Reduce Vehicular Noise: Reduce the impact of vehicular noise affecting existing residential development through the addition of noise reduction methods such as sound walls, berms or others.

Figure 17, Noise/Land Use Compatibility Matrix, shows the land use compatibility guidelines presented in the Noise Element as Table N-3. These guidelines, which are consistent with noise exposure noise standards identified in the Zoning Ordinance as described below, are used in coordination with the noted zoning standards to assist with determining the significance impacts related to noise exposure as noted in Implementation Program N-1 above.

The General Plan includes a discussion regarding the 1990–2010 Salinas Airport Master Plan, which was adopted by the City in 1993. As identified in the General Plan, the 1990–2010 Salinas Airport Master Plan is used by the City as a policy guide for development on or adjacent to the Salinas Municipal Airport. This plan continues to be used by the City as a policy guide. The airport master plan addresses aircraft noise, identifies specific locations within the City impacted by operations at the airport, and identifies specific noise/land use compatibility guidelines for development potentially affected by the Salinas Municipal Airport. Table N-4 of the General Plan includes noise compatibility guidelines for different types of land uses in the vicinity of the airport.

City of Salinas Zoning Code. Section 37-50.180 of the Zoning Code identifies performance standards for noise. Noise compatibility standards for various land uses are specified as are
<table>
<thead>
<tr>
<th>Land Use</th>
<th>Community Noise Exposure (Ldn or CNEL)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>50</td>
</tr>
<tr>
<td>Residential</td>
<td></td>
</tr>
<tr>
<td>Transient Lodging – Motel, Hotel</td>
<td></td>
</tr>
<tr>
<td>Schools, Libraries, Churches, Hospitals, Nursing Homes</td>
<td></td>
</tr>
<tr>
<td>Auditoriums, Concert Halls, Amphitheaters</td>
<td></td>
</tr>
<tr>
<td>Sports Arena, Outdoor Spectator Sports</td>
<td></td>
</tr>
<tr>
<td>Playgrounds, Parks</td>
<td></td>
</tr>
<tr>
<td>Golf Course, Riding Stables, Water Recreation, Cemeteries</td>
<td></td>
</tr>
<tr>
<td>Office Buildings, Business Commercial, and Professional</td>
<td></td>
</tr>
<tr>
<td>Industrial, Manufacturing, Utilities, Agriculture</td>
<td></td>
</tr>
</tbody>
</table>


- **ZONE A - Normally Acceptable:** Specified land use is satisfactory, based upon the assumption that any buildings involved meet conventional Title 24 construction standards. No special noise insulation requirements.

- **ZONE B - Conditionally Acceptable:** New construction or development shall be undertaken only after a detailed noise analysis is made and noise reduction measures are identified and included in the project design.

- **Zone C - Normally Unacceptable:** New construction or development is discouraged. If new construction is proposed, a detailed analysis is required, noise reduction measures must be identified, and noise insulation features included in the design.

- **ZONE D - Clearly Unacceptable:** New construction or development clearly should not be undertaken.

Source: City of Salinas 2002

Figure 17

Noise/Land Use Compatibility Matrix
Salinas Economic Development Element Program EIR
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short-duration cumulative noise level standards. Requirements for noise studies are specified as are options for noise abatement and mitigation. Section 37-50.180 performance standards are presented below:

The following performance standards shall apply to all use classifications in all zoning districts:

A. Noise. No use shall create ambient noise levels which exceed the following standards (see Table 37-50.50) as measured at the property boundary:

1. Duration and Timing. The noise standards in Table 37-50.50 shall be modified as follows to account for the effects of time and duration on the impact of noise levels:

   (A) In residential zones, the noise standard shall be 5.0 dBA lower between 9:00 p.m. and 7:00 a.m.

   (B) Noise that is produced for no more than a cumulative period of five minutes in any hour may exceed the standards above by 5.0 dBA.

   (C) Noise that is produced for no more than a cumulative period of one minute in any hour may exceed the standards above by 10.0 dBA.

2. Acoustic Study. The city planner may require an acoustic study for any proposed project or use that has the potential to create a noise exposure greater than that deemed acceptable by this section and require appropriate mitigation measures. The city planner or their designee shall prepare the study. The applicant shall be responsible for the cost of the study.

3. Noise Measurement. Noise shall be measured with a sound level meter, which meets the standards of the American National Standards Institute (ANSI Section S1.4-1979, type 1 or type 2). Noise levels shall be measured in decibels from the property line closest to the noise source. The unit of measure shall be designated as dBA. A calibration check shall be made of the instrument at the time any noise measurement is made.

4. Noise Attenuation Measures. The city planner may require the incorporation into a project of any noise attenuation measures deemed necessary and feasible to ensure that noise standards are not exceeded.

5. Exceptions. Sporting events and the like shall be exempt from these noise standards. Events issued a special event permit by the city may also be exempted from these noise standards as part of the review and approval process for that permit.
6. Delivery Hours. The hours of delivery for commercial/industrial uses with loading areas/docks and related service areas that abut or have direct street access from adjoining residential districts or other noise sensitive uses shall be limited to 7:00 a.m. to 9:00 p.m., seven days a week, unless an acoustic study is prepared for the city planner by their designee which demonstrates that the proposed use and related delivery activities will not exceed the maximum noise levels established in Table 37-50.50.

Table 37-50.50 Maximum Noise Standards

<table>
<thead>
<tr>
<th>Zone of Property Receiving Noise</th>
<th>Maximum Noise Level, CNEL/L_{dn}, dBA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agricultural District</td>
<td>70 dBA</td>
</tr>
<tr>
<td>Residential District</td>
<td>60 dBA</td>
</tr>
<tr>
<td>Commercial District</td>
<td>65 dBA</td>
</tr>
<tr>
<td>Industrial District</td>
<td>70 dBA</td>
</tr>
<tr>
<td>Mixed-Use District</td>
<td>65 dBA(^1)</td>
</tr>
<tr>
<td>Parks/Open Space District</td>
<td>70 dBA</td>
</tr>
<tr>
<td>Public/Semipublic District</td>
<td>60 dBA</td>
</tr>
</tbody>
</table>

Notes: The interior noise level in any residential dwelling unit located in a mixed-use building or development shall not exceed a maximum of forty-five dBA from exterior ambient noise.

**City of Salinas Noise Ordinance.** The City’s Noise Ordinance, Chapter 21A of the Municipal Code, defines various classes of noise (A through D) and defines noise regulations that pertain to each. The City does not have specific vibration thresholds. Based on studies of vibration conducted by the Federal Transit Administration, when there are fewer than 70 vibration events per day, a vibration velocity level of 80 VdB or greater will result in annoyance to people, and a level of 100 VdB or less is suggested to prevent damage to fragile buildings.

Noise from “home construction projects” is considered Class B noise. “It is unlawful to create and emit Class B noise as defined in this code between the hours of 9:00 p.m. of one day and 7:00 a.m. of the following day.” (Municipal Code, § 21A-7.)

**Standards of Significance**

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of noise, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on these subjects, or indeed on any subject addressed in the
checklist. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here, though in doing so it has exercised its discretion to do two things: first, the City has modified the Appendix G language to better reflect input it has received from noise experts based on their professional judgment; and second, the City has taken the generalized wording of the Appendix G inquiries and has made it more concrete and specific. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- **Exposure People to or Generation of Noise at Levels in Excess of Standards**

  Under this threshold, a significant noise impact would be identified if the proposed project would result in exposure of people to or generation of noise levels that would exceed applicable noise standards presented in the General Plan, Municipal Code, or Zoning Ordinance. The applicable noise standards used in the analysis are the maximum noise standards identified in Table 37.50.50 of the Zoning Ordinance as measured at the property boundary as discussed in the Regulatory Setting section above and shown again below for ease of reference.

  Under this threshold, construction-related noise classified as Class B noise would not be significant as long as the noise does not occur between 9:00 p.m. and 7:00 a.m.

- **Exposure Structures or People to Ground-borne Vibration**

  Under this threshold, a significant impact would occur if the construction of projects facilitated by the proposed project would generate excessive vibration levels that have potential to damage existing buildings in the immediate vicinity of the vibration source. Three potentially excessive vibration levels (constituting three components of this threshold of significance) are possible depending on the condition of buildings that could be affected. For structural damage, the California Department of Transportation recommends the following three vibration limits: 1) 0.5 inches/second peak particle velocity (PPV) for buildings that are structurally sound and designed to modern engineering standards; 2) 0.3 inches/second PPV for buildings that are found to be structurally sound but where structural damage is a major concern; and 3) a conservative limit of 0.08 inches/second PPV for ancient buildings or buildings that are documented to be structurally weakened.
Table 37-50.50  Maximum Noise Standards

<table>
<thead>
<tr>
<th>Zone of Property Receiving Noise</th>
<th>Maximum Noise Level CNEL/L_{dn}, dBA</th>
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<tr>
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<td>Residential District</td>
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</tr>
<tr>
<td>Commercial District</td>
<td>65 dBA</td>
</tr>
<tr>
<td>Industrial District</td>
<td>70 dBA</td>
</tr>
<tr>
<td>Mixed-Use District</td>
<td>65 dBA\textsuperscript{1}</td>
</tr>
<tr>
<td>Parks/Open Space District</td>
<td>70 dBA</td>
</tr>
<tr>
<td>Public/Semipublic District</td>
<td>60 dBA</td>
</tr>
</tbody>
</table>

\textsuperscript{1}The interior noise level in any residential dwelling unit located in a mixed-use building or development shall not exceed a maximum of forty-five dBA from exterior ambient noise.

Note that ground-borne vibration due to train pass-bys are not analyzed as part of this EIR. The U.S. Department of Transportation Federal Transit Administration *Transit Noise and Vibration Impact Assessment* (2006), defines three categories of vibration-sensitive uses. Buildings that are primarily used for industrial use are not included in any of the three sensitive-use categories. Since Target Areas B and F, which would both be developed with job-generating industrial and commercial retail uses, are the only Target Areas adjacent to UPRR tracks, these sites would not require ground-borne vibration analysis. If different land uses were ever proposed in these Target Areas B and F, project-specific analysis of potential impacts from vibrations would be necessary.

- **Expose People to Permanent Increases in Traffic Noise**

  The future development within the Target Areas would have a significant impact if both of the following conditions occur: 1) future development within the Target Areas causes a traffic noise increase of 3 dBA or more along a road segment where the existing noise level is 60 dBA or more, or causes a traffic noise increase of 5 dBA or more along a road segment where the existing traffic noise level is less than 60 dBA; and 2) it causes an increase in traffic noise that is 1 dBA or more above the projected 2045 no project condition noise volume on a road segment.

- **Cause a Substantial Temporary Increase in Ambient Noise Level during Construction**

  Temporary construction noise impacts would be substantial if the hourly average construction noise level exceeds 60 dBA L_{eq} at the property line of adjacent residential uses and the noise level increase is 5 dBA L_{eq}, or more above ambient levels for a period of
more than one year. At non-residential uses, the temporary noise increase would be substantial if the hourly average construction noise level exceeds 70 dBA $L_{eq}$ and the noise increase is at least 5 dBA $L_{eq}$ above ambient levels for a period exceeding one year.

The General Plan does not include policies or programs that limit the duration or intensity of construction noise. Except for noise from construction of residential uses, neither the Zoning Code nor Noise Ordinance contains regulations or standards that limit the intensity or duration of construction noise for non-residential projects. For this reason, the construction noise threshold of significance identified above is being utilized in this EIR. The threshold is based on three primary considerations; the noise level, the ambient noise environment, and the construction duration. The exterior noise level thresholds at sensitive uses (residential) and non-sensitive uses (commercial and industrial) is specified to ensure that interior noise levels at these use types would not exceed 45 dBA $L_{eq}$. Interior noise levels at or below 45 dBA $L_{eq}$ have a low probability for activity interference indoors.

The construction noise volume must also exceed the ambient noise environment volume by at least 5 dBA $L_{eq}$. This increase is identified because it would be clearly noticeable above the ambient noise level. The one-year benchmark is considered to be a reasonable amount of time over which a person can be subjected to ongoing construction noise. This timeframe allows for small projects to be constructed, assuming a person of normal sensitivity would not be adversely affected by temporary construction noise. Construction durations exceeding one-year would be considered significant if construction noise levels are not controlled.

The Appendix G questions on the subject of noise also give rise to two additional thresholds that are not relevant to the proposed project. The first of thresholds applies only to proposed projects 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, or within the vicinity of a private airstrip. The second of these thresholds only applies to proposed projects in the vicinity of private airstrips. Under both of these thresholds, a significant noise impact would result if people residing or working in such areas are exposed to excessive noise levels.

The Salinas Municipal Airport is located at the southeastern boundary of the city limits. As described in the Environmental Setting section above, each of the Target Areas is located outside the 65 dBA CNEL contour for aircraft activities associated with Salinas Municipal Airport. Consequently, new development within the Target Areas would not be exposed to aircraft overflight noise that exceeds the City’s exterior noise exposure thresholds. There are also no private airstrips within the project site vicinity, so the proposed project would have no related impacts. No further discussion of these issues is necessary.
Analysis, Impacts, and Mitigation

Potential noise impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

It should be noted that the modeling and analysis presented herein assumes that conceptual expressways proposed in the EDE are constructed. These have since been removed from the project description. Additional technical review was performed by a third party technical expert to determine whether or not the identified levels of significance would change as result of the expressway removal. In terms of noise impacts, removal of the expressways would not be expected to alter the analysis presented below for stationary noise or groundborne vibration. The shift in trip distribution resulting from expressway removal would alter the distribution of traffic-related noise throughout the City. However, these changes are not anticipated to require substantive modifications to the analysis or mitigation presented below. Refer to Appendix H for a complete summary of the changes to the analysis as a result of expressway removal.

Impact: Exposure of Future Development within the Target Areas to Traffic Noise Levels in Excess of Standards (Less than Significant with Mitigation)

Under year 2045 plus Target Area buildout conditions, traffic volumes on local roadways will increase. The proposed project would contribute to traffic noise levels through generation of new traffic. New development within the Target Areas will be exposed to traffic noise from roadways located adjacent to them. Noise impacts on future development within the Target Areas would be significant if traffic noise volumes exceed maximum exterior noise exposure levels identified in Table 37-50.50 of the Zoning Ordinance and levels identified in Figure 17, Noise/Land Use Compatibility Matrix, at outdoor uses areas within future commercial, business park/office, and industrial uses planned within the Target Areas. Projected traffic noise exposure at each of the Target Areas is summarized below.

Target Area V. Target Area V would be developed with commercial retail uses. Outdoor noise exposure at commercial uses must be at or below 65 dBA $L_{dn}$. Table 33, 2045 General Plan Buildout Plus Proposed Project Traffic Noise Contour Distances in the Vicinity of Target Area V, in the noise analysis report shows distances from the centerlines of the nearest through lane on roadways located adjacent to Target Area V at which noise levels of 65 dBA and 70 dBA would occur. Distances to the 65 dBA noise contour vary from a minimum of 110 feet along Constitution Boulevard (proposed in the General Plan to extend south from Laurel Drive
through Carr Lake) to 480 feet from U.S. Highway 101. Noise produced by vehicular traffic along roadways adjacent to Target Area V could potentially expose outdoor use areas located within the margins of the two polygons that comprise Target Area V to levels exceeding the exterior compatibility thresholds.

Table 33 2045 General Plan Buildout Plus Proposed Project Traffic Noise Contour Distances in the Vicinity of Target Area V

<table>
<thead>
<tr>
<th>Roadway</th>
<th>Segment</th>
<th>Distance from Centerline to Traffic Noise Contour, feet</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>70 dBA $L_{dn}$</td>
</tr>
<tr>
<td>Bernal Drive</td>
<td>North Main Street to Natividad Road</td>
<td>&lt;50 feet</td>
</tr>
<tr>
<td>Constitution Boulevard</td>
<td>Independence Blvd. to Boronda Road</td>
<td>&lt;50 feet</td>
</tr>
<tr>
<td>U.S. Highway 101</td>
<td>East Market Street to North Main Street</td>
<td>270 feet</td>
</tr>
<tr>
<td>North Main Street</td>
<td>U.S. Highway 101 to Alvin Drive</td>
<td>75 feet</td>
</tr>
<tr>
<td>Natividad Road</td>
<td>Bernal Drive to East Laurel Drive</td>
<td>130 feet</td>
</tr>
<tr>
<td>Sherwood Drive</td>
<td>U.S. Highway 101 to Natividad Road</td>
<td>110 feet</td>
</tr>
</tbody>
</table>


Target Areas B, F, and N. Target Area B is proposed for development with industrial and retail uses, while Target Area F is proposed for development with retail uses. Target Area N is located in the southeastern corner of the East Blanco Road/State Route 68 intersection. The proposed land use at Target Area N is commercial retail. The maximum exterior noise exposure thresholds for outdoor use areas are 65 dBA $L_{dn}$ at the commercial retail uses and 70 dBA $L_{dn}$ at the general industrial land uses.

Table 34, 2045 General Plan Buildout Plus Proposed Project Traffic Noise Contour Distances in the Vicinity of Target Areas B, F, and N, shows distances to the 65 dBA and 70 dBA noise contours from traffic on roadways located adjacent to Target Areas B, F, and N. For Target Areas B and F, future noise levels from traffic on U.S. Highway 101 would have the greatest effect on the proposed industrial and commercial land uses. Along this highway segment, the 2045 plus project 65 dBA and 70 dBA noise contours would extend 395 feet and 225 feet, respectively, from the centerline of the nearest through lane of the highway. Noise levels from traffic on Abbott Road would also impact these Target Areas, with the 65 dBA and 70 dBA noise contours extending up to 130 feet and about 50 feet, respectively, from the centerline of the
nearest through lanes on these roadways. Exterior noise levels could exceed the 65 dBA threshold at outdoor use areas within Target Areas B and F that are placed adjacent to the roadways. However, only noise from U.S. Highway 101 is likely to exceed the 70 dBA $L_{dn}$ threshold for industrial outdoor use areas located adjacent to U.S. Highway 101.

**Table 34  2045 General Plan Buildout Plus Proposed Project Traffic Noise Contour Distances in the Vicinity of Target Areas B, F, and N**

<table>
<thead>
<tr>
<th>Roadway</th>
<th>Segment</th>
<th>Distance from Centerline to Traffic Noise Contour, feet</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>70 dBA $L_{dn}$</td>
</tr>
<tr>
<td><strong>Target Areas B and F</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Abbott Street</td>
<td>South of Harris Road</td>
<td>75 feet</td>
</tr>
<tr>
<td>Harris Road</td>
<td>West of Abbott Street</td>
<td>55 feet</td>
</tr>
<tr>
<td>U.S. Highway 101</td>
<td>Sanborn Road to John Street</td>
<td>225 feet</td>
</tr>
<tr>
<td><strong>Target Area N</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>East Blanco Road</td>
<td>South Main Street/SR 68 to Abbott Street</td>
<td>115 feet</td>
</tr>
<tr>
<td>South Main Street</td>
<td>Blanco Road to Hunter Lane</td>
<td>85 feet</td>
</tr>
</tbody>
</table>

*Source: Illingworth & Rodkin 2017.*

Traffic noise from State Route 68/South Main Street, East Blanco Road, would affect planned future commercial retail uses within Target Area N. The 65 dBA noise contours would extend about 200 feet, 235 feet, and 145 feet from the centerline of the nearest through lane of these roadways, respectively. Exterior noise levels could exceed the 65 dBA threshold at outdoor uses within Target Area N that are placed adjacent to the roadways.

**Target Areas K and L2.** Target Area K is planned for business park and commercial retail use. Target Area L2 is planned for commercial retail use.

**Table 35, 2045 General Plan Buildout Plus Proposed Project Traffic Noise Contour Distances in the Vicinity of Target Areas K and L2** shows distances to the 65 dBA noise contour along roadways adjacent to Target Areas K and L2. Traffic noise from U.S. Highway 101 would impact Target Area K, as would traffic noise on Russell Road, Espinosa Road, Harrison Road, and Sala Road. Noise levels along the adjacent segment of U.S. Highway 101 would exceed 65 dBA up to a distance of about 480 feet from the centerline of the nearest through lane on the highway. Due to the geometry of Target Area K, U.S. Highway 101 is slightly elevated above
the surrounding area, which would provide some shielding. However, these future noise level estimates do not account for shielding. Traffic noise on adjacent local roadways would exceed 65 dBA at distances ranging from 80 feet to 180 feet from the nearest through lanes of the roadways. Therefore, outdoor uses areas within these distances could be exposed to noise levels that exceed City standards for both business park and commercial retail uses.

**Table 35 2045 General Plan Buildout Plus Proposed Project Traffic Noise Contour Distances in the Vicinity of Target Areas K and L2**

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Distance from Centerline to Traffic Noise Contour, feet</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area K</strong></td>
<td></td>
</tr>
<tr>
<td>Espinosa Road West of U.S. Highway 101</td>
<td>&lt;50 feet</td>
</tr>
<tr>
<td>Harrison Road Russell Road to Sala Road</td>
<td>75 feet</td>
</tr>
<tr>
<td>U.S. Highway 101 Russell Road to SR 156</td>
<td>225 feet</td>
</tr>
<tr>
<td>Russell Road Van Burens Avenue to San Juan Grade Road</td>
<td>&lt;50 feet</td>
</tr>
<tr>
<td>Sala Road U.S. Highway 101 to Harrison Road</td>
<td>80 feet</td>
</tr>
<tr>
<td><strong>Target Area L2</strong></td>
<td></td>
</tr>
<tr>
<td>U.S. Highway 101 East Laurel Drive to Boronda Road</td>
<td>270 feet</td>
</tr>
<tr>
<td>North Davis Road West Laurel Drive to Boronda Road</td>
<td>150 feet</td>
</tr>
</tbody>
</table>

*Source: Illingworth & Rodkin 2017.*

The future noise environment at Target Area L2 would primarily be affected by traffic along U.S. Highway 101, and North Davis Road. Traffic on U.S. Highway 101 adjacent to Target Area L2 would generate noise exceeding 65 dBA at a distance of 480 feet from the centerline of the nearest travel lane. The distances to the 65 dBA contour from North Davis Road would be about 110 feet and 285 feet, respectively. Future exterior noise levels would potentially exceed the 65 dBA threshold at outdoor uses planned within the margins of Target Area L2 located adjacent to the roadways.

The following mitigation measure requires that applicants for future individual future projects planned within the Target Areas prepare noise studies. A key purpose of the noise studies will be to evaluate noise exposure levels within each individual project site and to identify measures to reduce noise exposure that exceeds outdoor exposure standards to below the identified
thresholds for each respective land use type. Implementation of the mitigation measure would reduce exposure of people working in or otherwise utilizing outdoor use areas within the Target Areas to permanent traffic related noise to less than significant.

**Mitigation Measure**

N-1. Developers of future individual projects within portions of Target Areas where traffic related noise exposure exceeds 65 dBA for commercial and business park uses and 70 dBA for industrial uses as identified in the *City of Salinas General Plan Economic Development Element Draft Noise and Vibration Assessment Salinas, California* shall prepare a noise study. Each noise study shall identify traffic noise exposure levels within each individual project site; specify locations within each site where noise levels exceed thresholds; and define site design, building orientation, setbacks, noise barriers, or other measures needed to ensure noise exposure does not exceed standards at outdoor use areas. Each noise study shall be subject to review and approval of the Community Development Director and project design features needed to reduce outdoor noise exposure to acceptable levels shall be reflected in project development plans prior to approval of a building permit.

Where an individual project is proposed within any portion of a Target Area that is not exposed to noise levels that exceed acceptable levels for the proposed land use type as identified in the *City of Salinas General Plan Economic Development Element Draft Noise and Vibration Assessment Salinas, California*, a noise study is not required.

**IMPACT: DEVELOPMENT WITHIN THE TARGET AREAS COULD INCLUDE STATIONARY NOISE SOURCES THAT GENERATE NOISE WHICH EXCEEDS NOISE EXPOSURE STANDARDS AT ADJACENT NOISE SENSITIVE USES (LESS THAN SIGNIFICANT)**

Future development projects proposed within the Target Areas will include stationary sources of noise. Typical stationary noise sources associated with industrial, retail, and business park uses include, but are not limited to: rooftop and/or ground mounted mechanical equipment for heating, ventilation, and cooling; emergency generators; trash compactors; and loading dock offloading activities. Stationary noise sources have potential to generate noise intensities that can adversely affect noise sensitive land uses that may be located directly adjacent to the Target Areas. As noted previously, noise sensitive residential uses are located adjacent to a portion of Target Area V, and a noise sensitive school use is located adjacent to a portion of Target Area K. Residential uses are located across major roadways from Target Areas L2 and N.

The types, locations, and intensities of potential stationary noise sources associated with future development of the Target Areas cannot be known at the level of information available for the proposed project. This information will be provided by applicants for individual future projects once applications for such projects are submitted to the City. If stationary noise sources are
proposed which have potential to adversely impact off-site noise sensitive uses, the City may require a noise report to demonstrate whether such impacts may occur and if so, require project design modifications to ensure that maximum noise exposure levels at noise sensitive uses do not exceed standards identified in the Zoning Code. Mitigation measures may be required for individual future project to ensure consistency with Zoning Code standards.

**IMPACT: EXPOSURE OF PEOPLE AND STRUCTURES TO EXCESSIVE GROUNDBOURNE VIBRATION DURING CONSTRUCTION ACTIVITIES WITHIN TARGET AREAS (LESS THAN SIGNIFICANT WITH MITIGATION)**

Construction activities associated with development of the Target Areas may be located near existing structures and/or below ground infrastructure. Typical construction activities may include demolition of existing structures, grading, excavations of varying sizes and depths, foundation preparation, and building construction. If demolition of existing improvements is required, it can last several weeks and at times may produce substantial vibration. Excavations for below grade foundations and buildings, and vibratory pile driving to construct and stabilize below grade foundations and walls, and piles or drilled caissons to support building foundations may be required. All of these activities have potential to generate vibration that could adversely affect structures and improvements located within about 200 feet of intense vibration sources such as pile drivers.

For structural damage, the California Department of Transportation recommends a vibration limit of 0.5 inches/second peak particle velocity (PPV) for buildings structurally sound and designed to modern engineering standards, 0.3 inches/second PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 inches/second PPV for ancient buildings or buildings that are documented to be structurally weakened.

Table 12 in the noise analysis report shows vibration intensities for various types of construction activities/equipment at a distance of 25 feet. Construction activities such as drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.) may generate substantial vibration that could affect nearby improvements and structures. Vibration levels would vary depending on soil conditions, construction methods, and equipment used.

Pile driving has the potential of generating the highest ground vibration levels and is of primary concern regarding its potential to cause damage to existing structures, particularly when it occurs within 100 to 200 feet of structures. Vibration levels generated by pile driving activities would vary depending on soil conditions, construction methods, and equipment used, but could exceed the recommended PPV thresholds.
As with any type of construction, vibration may at times be perceptible. However, construction phases that have the highest potential of producing vibration (pile driving and use of jackhammers and other high power tools) would be intermittent and would only occur for short periods of time for any individual project site. Nevertheless, implementation of the following mitigation measure would ensure that potential impacts to structures and improvements from vibration during construction within the Target Areas would be reduced to less than significant. It requires analysis of potential vibration impacts under specific conditions that with the most likely potential to cause potential impacts and where potential impacts are identified, to implement specific measures to reduce the impacts. These measures would ensure that potential damage to structures is avoided by limiting vibration to levels that are compatible with the types and conditions of structures that would be exposed to vibration.

**Mitigation Measure**

N-2. Where the construction process for individual projects within the Target Areas include pile driving or other high vibration activities and those activities are planned within 200 feet of existing structures or below ground infrastructure, a qualified engineer shall be retained to prepare a site-specific vibration study. The study shall identify areas of potential vibration impact and measures to be implemented to reduce vibration impacts. Vibration impacts would be considered less than significant where vibration peak particle velocity is below the following standards: 1) 0.5 inches/second for structurally sound buildings designed to modern engineering standards; 2) 0.3 inches/second for buildings that are found to be structurally sound but where structural damage is a major concern; and 3) a conservative limit of 0.08 inches/second for ancient buildings or buildings that are documented to be structurally weakened. The vibration study shall include the following components:

- Planned locations and description/characterization of vibration compaction activities such as pile driving, assessment of the sensitivity of nearby structures to groundborne vibration, and vibration limits for all vibration-sensitive structures located within 200 feet of the vibration source;
- A vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, a vibration monitoring schedule, and a process to conduct photo, elevation, and crack surveys to document before and after construction conditions;
- Measures to ensure that when vibration levels approach limits, construction will be suspended and contingencies implemented to either lower vibration levels or secure the affected structures;
- A plan for making appropriate repairs or providing compensation where damage has occurred as a result of construction activities; and
• Where buildings within 200 feet of the vibration sources are inhabited, a public information program to notify affected neighbors of scheduled construction activities and their type and duration, and a construction schedule that assures that activities with the highest potential to produce perceptible vibration are conducted during hours with least potential to adversely affect nearby businesses and residents.

The vibration study shall be subject to review and approval by the Public Works Director prior to issuance of a demolition or building permit, whichever comes first.

**IMPACT: THE PROPOSED PROJECT WOULD GENERATE TRAFFIC THAT CONTRIBUTES TO A SUBSTANTIAL PERMANENT NOISE LEVEL INCREASE ON THE CITY ROAD NETWORK (POTENTIALLY SIGNIFICANT AND UNAVOIDABLE)**

The proposed project will add a significant volume of traffic to the existing road network. The proposed project would have a significant impact if it causes a substantial increase in traffic noise volume that has potential to adversely affect noise sensitive uses located along affected roadways. A substantial permanent traffic noise increase would occur if both of the following conditions are met: 1) the 2045 cumulative plus project traffic noise volume increase is 3 dBA or more along roads where the existing traffic noise volume is 60 dBA or more, or the traffic volume increase is 5 dBA or more on roads where the existing traffic noise volume is below 60 dBA; and 2) the 2045 cumulative plus project traffic noise volume increase is 1 dBA or more above roadway noise volumes under the 2045 no project condition.

Noise volumes on the affected road network 2045 no project conditions and 2045 plus project conditions were modeled as part of the noise analysis report.

*Table 36, Road Segments with Substantial Permanent Traffic Noise Level Increases,* summarizes the road segments shown in Table 8 of the noise analysis report on which traffic noise contributed by the proposed project would trigger both conditions noted above.

<table>
<thead>
<tr>
<th>Roadway</th>
<th>Road Segment with Substantial Permanent Traffic Noise Level Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rogge Road</td>
<td>San Juan Grade Road to Natividad Road</td>
</tr>
<tr>
<td>Russell Road</td>
<td>Van Buren Avenue to San Juan Grade Road</td>
</tr>
<tr>
<td>San Juan Grade Road</td>
<td>Rogge Road to Hebert Road</td>
</tr>
</tbody>
</table>

Methods available to mitigate noise level increases would need to be studied on a case-by-case basis at receptors that would experience a substantial increase in permanent traffic noise. Noise reduction methods could include one or more of the following, or other measures that may be available at the time noise impacts are triggered:

- New or larger noise barriers or other noise reduction techniques could be constructed to protect sensitive outdoor use areas at existing residential land uses, where reasonable and feasible or necessary to avoid noise levels in excess of what is allowed under the General Plan and Noise Ordinance;

- Alternative noise reduction techniques such as re-paving streets with "quieter" pavement types, including Open-Grade Rubberized Asphaltic Concrete that can reduce noise levels by 2 to 5 dBA, depending on the existing pavement type, traffic speed, traffic volumes, and other factors;

- Traffic calming measures to slow traffic; and/or

- Sound insulation such as sound rated windows and doors provided to impacted residents.

Implementation Program N-1 in the General Plan states that a CEQA study should be performed for each project-level development proposal to minimize the impacts on noise-sensitive land uses. For future development within the Target Areas the noise study would be used to implement related noise programs and policies in the General Plan, including Implementation Program N-1, which requires that roadway improvements be reviewed for potential noise impacts upon sensitive receptors, and Policy N-2.1 and Implementation Program N-5, which require noise impacts to be reduced through incorporation of noise control measures, such as earthen berms, landscaped walls, sound walls, and lowered streets, etc.

Given the scope of the proposed project and expected noise level increases resulting from project traffic, it may not be feasible to reduce substantial traffic noise increases generated by the proposed project at all affected receptors. Measures available to reduce the project noise level increases may not be reasonable or feasible in all locations where noise reduction is needed. Therefore, the impact is conservatively assumed to be significant and unavoidable.

**IMPACT: THE PROPOSED PROJECT WOULD CAUSE TEMPORARY NOISE INCREASES FROM SHORT-TERM CONSTRUCTION ACTIVITIES (LESS THAN SIGNIFICANT WITH MITIGATION)**

Construction activities for the proposed project would occur intermittently at different sites within in the City. Although related noise effects at any one location would be temporary, construction activities could cause adverse localized effects by raising noise volumes to levels
well above ambient levels. Where noise from construction activities exceeds 60 dBA L_{eq} and exceeds the ambient noise environment by at least 5 dBA L_{eq} at noise-sensitive uses for a period exceeding one year, the impact would be considered significant. For non-sensitive uses such as commercial uses, a significant impact would be identified if construction noise were to exceed 70 dBA L_{eq} and exceed the ambient noise environment by at least 5 dBA L_{eq} for a period exceeding one year. Industrial uses are not typically considered noise-sensitive.

Noise impacts resulting from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, and/or when construction lasts over extended periods of time.

Major noise-generating construction activities typically include removal of existing pavement and structures; site grading and excavation; installation of utilities; construction of building foundations, cores, and shells; and paving. Operation of heavy construction equipment, including the simultaneous use of multiple pieces of heavy equipment such as dozers, excavators, scrapers, and loaders; and the arrival/departure of heavy-duty trucks would also generate high noise levels. Typical hourly average construction generated noise levels are about 81 to 88 dBA L_{eq}, measured at a distance of 50 feet from the center of a site during busy construction periods (e.g., earth moving equipment, impact tools, etc.). Construction-generated noise levels drop off at a rate of about 6 dBA per doubling of distance between the source and receptor. Shielding by buildings or terrain often result in lower construction noise levels at distant receptors. Lower noise levels result from building construction activities when these activities move indoors and less heavy equipment is required to complete the tasks.

Reasonable regulation of the hours of construction, as well as regulation of the arrival and operation of heavy equipment and the delivery of construction materials, are necessary to protect the health and safety of persons, promote the general welfare of the community, and maintain the quality of life. Limiting the hours when construction can occur to daytime hours is often a simple method to reduce the potential for construction noise impacts. In areas immediately adjacent to construction, controls such as constructing temporary noise barriers and utilizing “quiet” construction equipment can also reduce the potential for noise impacts.

The duration of construction for any individual future project proposed within the Target Areas cannot be known at this time. This information would be available from project applicants at the time project applications are submitted to or by the City. Any project with a construction period of more than one year may have potential to cause construction noise impacts at nearby uses if
construction noise levels exceed those previously described at noise-sensitive or non-noise sensitive land uses. Implementation of the following mitigation measure would reduce potential impacts from construction noise to less significant by identifying projects with a construction period exceeding one year, determining projected construction noise levels and whether they exceed acceptable levels at nearby uses, and where noise levels exceed acceptable levels, requiring implementation of construction noise reduction measures to ensure that construction noise does not exceed acceptable levels.

**Mitigation Measure**

N-3. The City shall review applications for each future individual project within the Target Areas to determine whether the construction period will exceed one year. For all projects with a construction period exceeding one year, each project applicant shall prepare a construction noise assessment. The construction noise assessment shall identify: 1) the types and noise intensities of construction equipment to be utilized; 2) the locations of noise-sensitive uses (e.g. residential, schools, etc.) and non-sensitive uses (e.g. commercial and industrial uses) that would be exposed to construction noise, the projected construction noise levels at these uses, and whether construction noise levels may exceed both 60 dBA Leq and ambient noise levels by at least 5 dBA Leq at noise-sensitive uses, or 70 dBA Leq and ambient noise levels by at least 5 dBA Leq at non-sensitive uses. Where either condition occurs, project applicants shall identify and implement construction noise reduction measures that ensure construction noise does not exceed these noise levels. The construction noise reduction measures shall include the measures listed below unless the construction noise assessment includes data which demonstrates to the City that allowable construction noise levels can be met with fewer and/or substitute noise reduction measures. However, for all projects, the limits on construction hours and days as listed below shall apply.

- Restrict noise-generating activities at construction sites or in areas adjacent to construction sites to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday. Construction shall be prohibited on Saturdays, Sundays and holidays unless prior written approval is granted by the Public Works Director;
- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment to provide a minimum of 5 dBA noise reduction;
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment;
- Prohibit unnecessary idling of internal combustion engines;
• Locate stationary noise-generating equipment such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, install adequate muffling/enclosures;

• Utilize "quiet" air compressors and other stationary noise sources where possible;

• Locate construction staging areas, material stockpiles, and maintenance/equipment and parking areas as far as feasible from residential receptors;

• Route all construction traffic via designated truck routes where possible. Prohibit construction related heavy truck traffic in residential areas where feasible; and

• Designate a "disturbance coordinator" responsible for responding to complaints about construction noise and for defining reasonable measures to correct complaint issues. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it a notice to be sent to adjacent property owners.

The construction noise assessment and construction noise reduction measures shall be subject to review and approval of the Public Works Director prior to issuance of a demolition or building permit, whichever comes first.

3.11 Public Services

Other than Target Area V, the remaining Target Areas are located outside the city limits. If and when the remaining Target Areas are annexed to the City, the City would be responsible for providing services to new development within them. This section discusses potential changes in demand on the City’s fire and police protection services and whether such changes require new facilities, the construction of which could lead to environmental impacts. Information about changes in service demand and related facility needs is based primarily on communications with representatives of the fire department and police department.

The proposed project is focused on expanding employment opportunities within the City over time to meet the employment needs of the City’s growing population. The Target Areas are assigned land use designations (retail, industrial, and business park) that expand opportunities for the City to attract employment generating economic development. The proposed project does not include new land capacity for residential uses; it would not be directly population inducing. Therefore, it would not increase demand for other types of public services or facilities such as new or expanded schools, parks and recreation, or library facilities. These topics are discussed in Section 3.15, Effects Found Not to Be Significant.

The City did not receive comments on the NOP regarding public services impacts.
Existing Fire and Police Services Setting

Fire Protection

Fire protection services in Salinas are provided by the City of Salinas Fire Department. The fire department headquarters is located at 65 West Alisal Street #210. The fire department is organized into six divisions: Suppression Division, Fire Prevention Bureau, Emergency Medical Services (EMS), Training Division, Vehicle Maintenance Division, and Hazardous Materials (HazMat) Team. As of late 2016, there were 99 full-time employees and one part-time employee. The fire department maintains six pumper trucks, two ladder trucks, a crash truck for airport emergencies, an Office of Emergency Services fire truck for state wide emergency response needs, and other service vehicles. The department operates six fire stations located at:

- Fire Station #1 at 216 West Alisal Street;
- Fire Station #2 at 10 West Laurel Drive;
- Fire Station #3 at 827 Abbott Place;
- Fire Station #4 at 308 Williams Road;
- Fire Station #5 at 1400 Rider Avenue; and,
- Fire Station #6 at 45 East Bolivar Street.

The station locations are shown in General Plan Figure LU-9, Public Facilities. Plans are in place to construct a new fire station in the area of East Boronda Road and Natividad Road within the Central Area Specific Plan area.

The City recognizes that new fire station facilities, equipment, staff, and associated support facilities for administration, training and vehicle maintenance are needed to meet fire protection service standards. Three of the existing six fire stations need to be replaced and two new fire stations are needed. The typical response time to any location in the City is approximately six minutes from the nearest station. The General Plan reports the goal of the department is to arrive on the scene of emergencies within six minutes of notification, 90 percent of the time. Currently, the department is able to meet the goal 86 percent of the time (Brett Loomis, City of Salinas Fire Department, pers. com., December 8, 2016).

The fire department receives funding through several sources, including the City General Fund, Measure G funds, development impact fees, EMS first responder fees, vehicle accident response fees, false alarm fees, inspection fees, grants, Certified Unified Program Agencies (CUPA) funds, contractual services with Monterey County Regional Fire District, and County Service Area 74.
allocations. Funding from these sources supports staffing, facility maintenance, capital improvement programs, equipment purchases, EMS response and training, fire prevention and training, and HazMat team operations.

In addition to serving the communities within the city limits, the fire department provides protection service to the unincorporated areas adjacent to the city limits, including the communities of Bolsa Knolls, Country Club Estates, Boronda, and Valle San Juan. The City has automatic aid agreements with Monterey County Regional Fire District and North County Fire Protection District of Monterey County. The department also participates in the Monterey County Mutual Aid Plan, Statewide California Master Mutual Aid Agreement, and the California Fire Assistance Agreement, and also provides automatic and contractual response to the wildland mutual threat areas within the County (Brett Loomis, Salinas Fire Department Chief, pers. com., December 8, 2016).

**Police Protection**

Police protection services are provided by the Salinas Police Department. The police department operates out of a station located at 222 Lincoln Avenue. As of late 2016, the Operations Division was staffed by sworn officers including the chief, two deputy chiefs, seven commanders, sergeants, and patrol officers including detectives a ratio of approximately 0.8 officers per 1,000 persons (based on the Department of Finance 2016 City population estimate of 161,042). The police department also includes non-sworn civilian employees, including records clerks, community service officers, custodians, and other non-police assignments.

Department response time data is unavailable as the response is dependent on several variable factors. The police department communications center screens and assign calls on a priority basis based on the nature of the problem. The highest priority calls are typically answered within a few minutes. Less urgent calls can take longer depending on availability of the police officers and other calls the department is responding to at the time (Henry Gomez, Salinas Police Department, pers. com., November 15, 2016).

The police department receives its funding primarily from the City General Fund and taxes generated from public approved Measure V and Measure G. A smaller portion of funding is received from grants. The funds support the police department salaries, equipment, training, and operations. Funds from Measure G will be used to construct a new police station which will replace the current facility. The new police station will be located on land purchased by the City on East Alisal Street at the intersection with Work Street. Construction is scheduled to begin in mid-2018 and the new station is expected to open by the end of 2019.
Standards of Significance

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of public services, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on these subjects, or indeed on any subject addressed in the checklist. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would result in substantial adverse environmental impacts associated with the provision of new or physically altered governmental facilities, in order to maintain acceptable services ratios, response times or other performance objectives for:

- Fire protection;
- Police protection;
- Schools;
- Parks; and
- Other public facilities.

As described previously, the proposed project would not result in an increase in demand for schools, parks and recreation facilities, or other public services or facilities. No further discussion of related effects is required. The analysis below is therefore limited to possible construction-related impacts associated with providing fire and police protection. Notably, CEQA does not treat impacts on service ratios or response times to be adverse effects on “the environment.” (City of Hayward v. Board of Trustees of the California State University (2015) 242 Cal.App.4th 833, 843.) Rather, what matters under CEQA is whether, in order to maintain adequate service ratios or response times, a city, county, or other service provider would have to build new or expanded physical facilities, which themselves could result in environmental effects. (Id. at pp. 843-844; see also Goleta Union School Dist. v. Regents of University of California (1995) 37 Cal.App.4th 1025, 1032-1033 [CEQA is not concerned with school overcrowding, which is a socio-economic effect, but is concerned with the impacts of school construction needed to alleviate overcrowding].)

Analysis, Impacts and Mitigation Measures

Potential impacts of developing the Target Areas and proposed expressways are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.3,
Project Description. Individual future projects proposed within the Target Areas and
development of the expressways would be subject to additional detailed CEQA evaluation based
on detailed project description information that accompanies project-level entitlement
applications.

**ENVIRONMENTAL IMPACTS RESULTING FROM FUTURE CONSTRUCTION OF NEW FIRE
PROTECTION FACILITIES, THE LOCATIONS OF WHICH ARE UNKNOWN**

The Salinas Fire Department currently does not have capacity to provide service to new
development within the Target Areas. The proposed project will contribute to future demand for
new fire protection facilities, the construction of which could have potential to create adverse
impacts. However, given long-term implementation timeframe for the EDE, the fact that fire
department already projects the need to construct up to six additional fire stations (the specific
locations of which are not currently defined), and the program level of analysis being utilized in
this EIR, it is uncertain, but possible that the proposed project itself could trigger the need for
one or more additional fire protection facilities/stations.

Lacking precise information about whether one or more stations would be required or where a
new station(s) may be located, the specific environmental impacts of constructing a new fire
station cannot be determined as part of this program EIR. Impacts of constructing new fire
stations would be similar to impacts associated with constructing common types of land
development projects. If one or more new stations were required in the future and they are
proposed within the boundary of a Target Area, the general environmental impacts of and
mitigations for constructing and operating the station would be similar to those defined in other
sections of this EIR for buildout of the Targets Areas.

Ultimately, the precise impacts of constructing and operating new fire protection facilities, if one
or more is needed, will be assessed in future CEQA documentation prepared for the facilities or
for a larger project within which a future fire protection facility site is planned.

**IMPACT: NEW DEVELOPMENT WITHIN TARGET AREAS MAY REQUIRE CONSTRUCTION
OF NEW POLICE PROTECTION FACILITIES WHICH MAY RESULT IN ENVIRONMENTAL
IMPACTS (NO IMPACT)**

The proposed project will put additional demand on police protection services, mainly during
the weekday business hours, but also during off hours. Were buildout of the Target Areas to
occur before 2019, the police department would have insufficient capacity to meet the demand
from the existing police facility. However, the new police station on East Alisal Street at the
intersection with Work Street will have the capacity to serve the City and all planned new
developments over the next 35 to 40 years, including future developments within the Target Areas (Henry Gomez, Salinas Police Department, pers. com., January 9, 2017). Construction is anticipated to begin in mid-2018 with completion expected by end of 2019. The environmental impacts of constructing the new police station have already been addressed through a separate CEQA process conducted specifically for that project. The proposed project would have no impact from construction of police protection facilities.

### 3.12 Transportation

Future development within the Target Areas will generate a substantial volume of traffic. That traffic will be distributed onto the local and regional transportation network. Potential exists that the added traffic could impact the performance of specific roadway segments and/or intersections, including U.S. Highway 101 and local roads and intersections within the City and the County. This section of the EIR examines these potential impacts as well as evaluates potential impacts related to planning for and accommodating alternative forms of transportation.

Information in this section is derived primarily from the Economic Development Element Draft Transportation Impact Analysis (Fehr & Peers 2017) (TIA). This report is included in Appendix I on the CD on the inside back cover of this EIR.

In its response to the NOP, Building Healthy Communities (BHC) commented that a project alternative should be considered that eliminates the proposed Eastside, Westside, and Southside expressways to reduce auto dependence. The additional roadways have since been removed from the project description.

BHC also suggests increasing the floor area ratio (FAR) for development within the City to encourage higher density development and reduce vehicle trips. These two comments are addressed in Section 6.0, Alternatives. The Monterey County Resource Management Agency commented that impacts on the County roadway network should be evaluated, both for the proposed project and for alternatives to the proposed project.

**Environmental Setting**

**Existing Street and Highway Network**

Because the Economic Development Element has a near city-wide scope, access to areas that could be developed under the proposed project would be provided by most primary and local roads in Salinas. This section describes these existing roadway facilities, which are shown in Figure 18, Existing Road Network.
Figure 18

Existing Road Network

Salinas Economic Development Element Program EIR
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U.S. Highway 101 is a north-south, four-lane freeway extending through the City of Salinas. The highway becomes a six-lane freeway between East Boronda Road and Russell Road, through the north city limits. The intersection of U.S. Highway 101 and major roadways in Salinas are either an interchange or grade separated overpass.

San Juan Grade Road is a four-lane roadway south of East Boronda Road that intersects at North Main Street, and continues as two-lane roadway north of East Boronda Road. The posted speed limit is 45 mph. Major intersections are controlled by traffic signals and minor intersections are controlled by side street stop control, with San Juan Grade Road as a free flow roadway.

McKinnon Street is two-lane collector with bicycle lanes that connects with East Boronda Road and Alvin Drive. The posted speed limit is 35 mph.

El Dorado Drive is a two-lane collector with bicycle lanes that connects with East Boronda Road and Alvin Drive, with a center turn lane between Harden Parkway and Alvin Drive. The posted speed limit is 25 mph.

Natividad Road is a six-lane divided major arterial from East Laurel to East Boronda Road. A portion of Natividad Road, between East Boronda Road and Los Coches Avenue, has sound walls on each side of the roadway with a posted speed limit of 45 mph. Natividad Road is a two-lane rural roadway north of East Boronda Road. South of East Bernal Drive, this road is known as Sherwood Drive, a four-lane arterial.

North Main Street is a six-lane divided major arterial between U.S. Highway 101 in the south and East Boronda Road in the north with a posted speed limit of 35 miles per hour in this section. South of U.S. Highway 101 to East Market Street, North Main is a four-lane undivided arterial with a center turn lane and part of Caltrans right-of-way within the City. Near its terminus at East Market Street, North Main Street transitions into a couplet with Salinas Street continuing southbound, while Monterey Street provides northbound access.

Harris Road is a rural roadway that provides access from Abbott Street in the north to the community of Spreckles in the south. It is a two-lane road for a majority of the route, with a painted center median in the southern section. The road provides access to mainly agricultural and light industrial uses.

North Davis Road is a four-lane divided arterial that starts at the end of East Boronda Road and continues south to Market Street. South of West Market Street/California State Route 183 (SR 183), it continues as South Davis Road and it shifts to a two-lane divided road with a painted median and left turn pockets. North Davis Road includes bicycle lanes up to Laurel Drive. Bicycle lanes resume after Post Drive and continue through South
Davis Road up to Blanco Road. South of Blanco Road, Davis Road becomes a two-lane rural highway that serves agricultural uses up to it southerly terminus at Reservation Road.

- Russell Road begins at the Espinosa Road/Russell Road interchange with U.S. Highway 101 and proceeds east to Van Buren Street as a two-lane roadway with a center turning lane. Thereafter Russell Road continues east as a two lane street. The posted speed limit ranges from 35 to 45 mph.

- Espinosa Road is a two-lane rural highway that serves primarily agriculture uses but also connects to State Route 183 at its western terminus. It continues into Russell Road east of the U.S. Highway 101 interchange.

- East Boronda Road begins at the Boronda Road interchange with U.S. Highway 101 as a six-lane major arterial to North Main Street. East of North Main Street, East Boronda Road transitions to two lanes eastbound and three lanes westbound to San Juan Grade Road. East Boronda Road then narrows to a two-lane arterial east of San Juan Grade Road until it terminates at Williams Road. Traffic signals control the intersections of East Boronda Road and all major arterials. East Boronda Road is designated in the General Plan as a six-lane roadway and truck route along its entire length.

- Rogge Road is a County two-lane collector road connecting San Juan Grade Road and Natividad Road. The speed limit is 35 mph with a school zone of 25 mph.

- Alisal Road is a two-lane rural road with a posted speed limit of 55 miles per hour. It runs from Spence Road in the east to East Alisal Street/Bardin Road at the city limit. Alisal Road borders the Salinas Municipal Airport to the north but does not provide direct access to it.

- Old Stage Road is a largely rural road that provides access to several agricultural areas north of the city limits. For most of its length, it is a two-lane rural road. Near Natividad Road, the posted speed limit is 45 miles per hour.

- Blanco Road is a four-lane divided arterial with a physical median and left turn lanes. In Salinas, it runs from South Davis Road in the west to Abbott Street, where it continues north as South Sanborn Road. Segments of Blanco Road are in County jurisdiction. The posted speed limit is between 45 and 55 miles per hour. The road parallels the southern extent of the city limits; as such it serves a mix of residential and agricultural uses.

- Williams Road is a four-lane divided arterial with left-turn lanes between Del Monte Avenue and Freedom Parkway. Between Del Monte Avenue and East Alisal Street, Williams Road is a four-lane arterial with a center turn lane and left turn lanes. There is a painted bicycle lane between Freedom Parkway and Bardin Way.
Existing Truck Routes

U.S. Highway 101 and City-designated truck routes serve the primary industrial areas of the community. These roads are intended to move goods efficiently within the City, between outlying agricultural uses, and packing/distribution centers. Additionally, they serve to separate truck traffic from local streets where the larger vehicles may conflict with other uses.

Aside from U.S. Highway 101, the following roads in part or in whole serve as truck routes on City streets:

- Blanco Road
- Davis Road
- East Boronda Road
- Williams Road
- East Alisal Street
- Skyway Boulevard
- Airport Boulevard
- Sanborn Road
- Laurel Drive

Existing Pedestrian Facilities

Pedestrian facilities include sidewalks, curb ramps, crosswalks, and off-street paths. These facilities should provide safe and convenient routes for people walking to traverse the City. Policies and programs relating to walking in Salinas are defined in General Plan Circulation Element Goal C-5 and the 2004 Salinas Pedestrian Plan (discussed in Regulatory Setting section below). Pedestrian facilities exist in Salinas to varying degrees of comprehensiveness. Improved pedestrian facilities typically correspond to recent development, while roads adjacent to agricultural uses or undeveloped lots typically do not provide pedestrian facilities, which is common in urbanizing communities.

Existing pedestrian facilities may have barriers in the form of signposts, utility poles, or overgrown vegetation. Such barriers can also provide challenges to the access requirements for persons with disabilities, as mandated in Americans with Disabilities Act. As parcels are developed and landowners are required to install sidewalks, there can also be gaps in the sidewalk system when adjacent parcels are not redeveloped or vacant. The City is updating its Americans with Disabilities Act transition plan, which will help identify these barriers and develop strategies to eliminate gaps in the pedestrian path of travel.

Existing Bicycle Facilities

Bicycle facilities consist of paths (Class I), lanes (Class II), and routes (Class III). Bicycle paths are paved trails that are separate from roadways. Bicycle lanes are separate areas on roadways
designated for bicycle use by striping, pavement legends, and signs. Bicycle routes are roadways designated for bicycle use by signs only, but may not include substantial width for bicycle travel. Like pedestrian facilities, bicycle networks are typically included in the General Plan, along with any proposed improvements or extensions. A list of existing and planned bicycle facilities included in the 2002 Salinas Bicycle Plan is provided on pages 12-13 of the TIA in Appendix I and an illustration of existing and planned facilities is shown in Figure 4 of the TIA.

**Existing Transit Service**

Monterey-Salinas Transit (MST) provides fixed-route bus service in Monterey County, including the City of Salinas. Most routes follow a hub-and-spoke service pattern, originating and returning to the Salinas Transit Center in downtown. Express and commuter buses are also provided to regional destinations in Monterey and Santa Cruz counties. As of 2014, ridership was about 14,000 trips on an average weekday. A transit bus service is included as Figure 5 of the TIA and Table 1 of the TIA lists current bus routes that serve the City. Several of the local routes travel roads located adjacent to several of the Target Areas.

**Existing Traffic Volumes and Level of Service on Study Area Roadways**

**Analysis of Road Segments and Traffic Volumes.** Consistent with the General Plan policy, the traffic analysis performed for the EDE evaluates conditions on key roadway segments located throughout the City. The approach that has been taken is to evaluate the EDE’s potential impacts at a roadway segment level of detail. This method assesses the City roadway network (i.e. number of lanes) capability to serve the proposed land use changes. It is consistent with the City’s historical approach of evaluating General Plan level traffic impacts and with the methodologies employed on similar projects in other jurisdictions.

Evaluation of vehicular delays and levels of service at intersections, typically performed for a project level environmental review, was not identified as appropriate or necessary. At the current programmatic level, the project has not been defined at a level which would make the assessment of intersection levels of service accurate or meaningful. This approach is common for General Plan level traffic impact analyses wherein relatively substantial levels of development are contemplated within generally defined areas. In these instances, internal roadway networks, access intersections and other “project” level details are not yet defined or known, thus making their evaluation problematic.

Roadway segment volumes were evaluated during 48-hour and 72-hour periods on midweek days in January, February, and April of 2016. The roadway locations are listed in the TIA starting on page18.
**Existing City/County Roadway Performance.** The operational performance of a roadway is typically described by its level of service (LOS), which is a qualitative description of traffic flow based on factors such as speed, travel time, delay, and freedom to maneuver. Six levels are defined by roadway facility classification based on guidance from the General Plan. LOS A reflects free-flow conditions where there is very little interaction between vehicles. LOS F reflects highly congested conditions with long delays. The LOS of a segment is assessed by comparing the observed volumes to the theoretical maximum capacity that a roadway segment can accommodate. The average daily observed traffic volume for each segment was compared against the defined threshold for the roadway classification type. A LOS rating is then assigned based on the lower and upper thresholds that the volume falls between. For example, a volume of 27,000 on East Laurel Drive would yield LOS C because it is between the thresholds for LOS B and LOS C.

*Figure 19, City/County Roadway Existing Levels of Service,* illustrates the road segments (City and County segments) that operate at LOS E or F, both of which are below the acceptable LOS D threshold. These roadway segments are as follows:

Roadways currently operating at LOS E include:
- North Main Street (State Route 183) between U.S. Highway 101 and Rossi Street (City)
- San Miguel Canyon Road between U.S. Highway 101 and Castroville Boulevard (County)
- Alisal Road between East Alisal Street and Hartnell Road (County)
- West Market Street between North Davis Road and McFadden Road (County)

Roadway segments currently operating at LOS F:
- East Boronda Road between McKinnon Street and El Dorado Drive (City)
- East Boronda Road between El Dorado Drive and Natividad Road (City)
- Davis Road between West Market Street and Central Avenue (City)
- Blanco Road west of Davis Road (County)
- San Miguel Canyon Road between Castroville Boulevard and Strawberry Road (County)
- West Laurel Drive between U.S. Highway 101 and Adams Street (City)
- Castroville Road (State Route 183) between Espinsoa Road and State Route (SR) 156 (Caltrans)
East Boronda Road is planned for a capacity expansion to coincide with development of two specific plans that have been submitted to the City but not yet considered for approval - the West Area Specific Plan and the Central Area Specific Plan. Current conceptual designs call for a phased expansion of the road to five lanes or ultimately six lanes at full General Plan buildout. The City is also considering roundabouts at key intersections (including but not limited to McKinnon Street, El Dorado Drive, Natividad Road, Independence Road, and Hemingway Drive as an alternative to signalized intersections at these and other potential locations.

**Existing U.S. Highway 101 Mainline Performance.** Observations about existing conditions on U.S. Highway 101 were made at nine locations in the vicinity. Table 4 of the TIA shows that U.S. Highway 101 between SR 156 and San Miguel Canyon Road operates at LOS E. It is the only segment that operates below Caltrans’ LOS D standard.

**Regulatory Setting**

**State**

**California Department of Transportation.** Caltrans is responsible for state highways and associated highway ramps and for intersections where freeway ramps intersect the local street system. Caltrans generally strives to maintain LOS D on its facilities, but recognizes that circumstances may limit its ability to do so. Caltrans has jurisdiction over the operations of mainline U.S. Highway 101 and over the on- and off-ramps to the highway. The proposed project will generate traffic that affects U.S. Highway 101 mainline operations. Therefore, Caltrans is a responsible agency under CEQA.

**Local Plans and Regulations**

**Regional Transportation Plan.** The Transportation Agency for Monterey County (TAMC) is responsible for preparing the Regional Transportation Plan (RTP) for Monterey County. The RTP does the following: includes policy guidance, plans, and programs to attain a balanced comprehensive, multimodal transportation system; proposes solutions to transportation issues; addresses all modes of travel; and identifies anticipated funding for projects and programs. The RTP is embedded in the Association of Monterey Bay Area Government’s *2035 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties* (Association of Monterey Bay Area Governments 2014) (MTP/SCS). The objective of the RTP and the MTP/SCS is to comply with current California Transportation Commission Regional Transportation Plan Guidelines.
Figure 19
City/County Roadway Existing Level of Service

Salinas Economic Development Element Program EIR
The Association of Monterey Bay Area Governments (AMBAG), as the federally-designated metropolitan planning organization representing Monterey, San Benito and Santa Cruz counties, is required by both federal and state law to prepare a long-range (at least 20 years) transportation planning document known as a metropolitan transportation plan. The metropolitan transportation plan contains a compilation of the projects proposed in the RTPs prepared by the Council of San Benito County Governments, the Santa Cruz County Regional Transportation Commission and TAMC. The metropolitan transportation plan is a document used to achieve a coordinated and balanced regional transportation system.

In the vicinity of the City of Salinas, the RTP includes a number of regionally significant projects, including the following:

- U.S. Highway 101–Alvin Drive. Construct overpass/underpass and four lane street structure;
- Russell Road Widening. Widen street from U.S. Highway 101 to San Juan Road;
- U.S. Highway 101-Salinas Corridor. Widen U.S. Highway 101 to 6 lanes within the existing right of way at locations where feasible;
- U.S. Highway 101-Harris Road Interchange. Construct new Interchange on U.S. Highway 101 at Harris Road, Post Mile 83.71;
- Salinas Bus Rapid Transit. Construct Bus Rapid Transit improvements along Alisal Street and North Main Street; and
- Rail Extension to Monterey County. Extends existing rail service from San Jose to Salinas and constructs station improvements in Gilroy, Pajaro, Castroville and Salinas. Kickstart phase to be completed by 2020 will establish stops in Gilroy and Salinas with limited Salinas station improvements.

**TAMC Regional Development Impact Fee Program.** The RTP also includes funding sources and strategies for financing improvements to the regional transportation system. Key components of the funding strategy are a regional development impact fee and a sales tax increase. The regional fee is applied to new development within local jurisdictions that are members of TAMC, including the City of Salinas. Funds generated through the regional development impact fee would, among other major projects, be used to fund projects included in the RTP that would benefit circulation conditions in and around the City. Member agencies must adopt the regional development impact fee before they can begin to collect the fee from new development. The City of Salinas adopted the fee program in August 2008.
At this time, Caltrans considers payment of the regional development impact fee as mitigation for cumulative impacts on the regional (state) highway system. However, at the time building permits are requested, developers of future projects within the Target Areas would be required to pay traffic fees defined in the TAMC regional fee program and in any other fee program that has been adopted at that time that is designed to mitigate cumulative impacts on the regional highway system.

**Monterey County General Plan.** The 2010 Monterey County General Plan Circulation Element provides policy direction for the transportation systems that serve the unincorporated lands of Monterey County, including roadways that could be affected by the proposed project. The element describes how the County intends to serve transportation needs for the next 20 years as the County's population grows. It identifies the general location and extent of existing and proposed major transportation facilities for vehicle, rail, air, water, and bicycle transportation, including goals relative to: major roadways, movement of people and goods, scenic highways, and public transit. Policies from the element that generally apply to consideration of impacts of the proposed project on County roadway facilities include:

**Policy C-1.1:** The acceptable level of service for County roads and intersections shall be Level of Service (LOS) D, except as follows:

a. Acceptable level of service for County roads in Community Areas may be reduced below LOS D through the Community Plan process.

b. County roads operating at LOS D or below at the time of adopting this General Plan shall not be allowed to be degraded further except in Community Areas where a lower LOS may be approved through the Community Plan process.

c. Area Plans prepared for County Planning Areas may establish an acceptable level of service for County roads other than LOS D. The benefits which justify less than LOS D shall be identified in the Area Plan. Where an Area Plan does not establish a separate LOS, the standard LOS D shall apply.

**Policy C-1.2:** The goal of achieving the level of service noted in Policy C-1.1 is to be pursued through a combination of:

a. Expenditures from available funds out of the County Road Fund;

b. Circulation improvements that mitigate direct on site and off site development project impacts (see Policy C-1.3);
c. Development and adoption of a Traffic Impact Fee (TIF) as part of a Capital Improvement and Financing Plans (CIFP) to:

1. Identify and prioritize the improvements to be completed in the benefit areas over the life of the General Plan;

2. Ensure a funding mechanism for transportation improvements to county facilities in accordance with Policy C-1.8; and

3. Categorize transportation projects as "high," "medium," or "low" priority.

d. Coordination with all adopted transportation improvement programs within the County of Monterey including but not limited to TAMC, FORA, and cities.

CIFPs shall be developed pursuant to Policy PS-I. Construction costs and land values shall be adjusted annually and the CIFP shall be reviewed every five (5) years in order to evaluate the effectiveness of meeting the LOS standard for County roads. Road segments or intersections identified to be below LOS D shall be a high priority for funding.

**Policy C-1.3:** Circulation improvements that mitigate Traffic Tier 1 direct on-site and off-site project impacts shall be constructed concurrently (as defined in subparagraph (a) only of the definition for "concurrency") with new development. Off-site circulation improvements that mitigate Traffic Tier 2 or Traffic Tier 3 impacts either shall:

a. be constructed concurrently with new development, or

b. a fair share payment pursuant to Policy C-1.8 (County Traffic Impact Fee), Policy C-1.11 (Regional Development Impact Fee), and /or other applicable traffic fee programs shall be made at the discretion of the County.

**Policy C-1.4:** Not withstanding Policy C-1.3, projects that are found to result in reducing a County road below the acceptable LOS standard shall not be allowed to proceed unless the construction of the development and its associated improvements are phased in a manner that will maintain the acceptable LOS for all affected County roads. Where the LOS of a County road impacted by a specific project currently operates below LOS D and is listed on the CIFP as a high priority, Policy
C-1.3 shall apply. Where the LOS of a County road impacted by a specific project currently operates below LOS D and is not listed on the CIFP as a high priority, development shall mitigate project impacts concurrently. The following are exempt from this Policy except that they shall be required to pay any applicable fair share fee pursuant to Policies C-1.8, C-1.11, and/or other applicable traffic fee programs:

a. first single family dwelling on a lot of record;

b. allowable non-habitable accessory structures on an existing lot of record;

c. accessory units consistent with other policies and State Second Unit Housing law;

d. Any use in a non-residential designation for which a discretionary permit is not required or for which the traffic generated is equivalent to no more than that generated by a single family residence (10 ADT); and

e. Minimal use on a vacant lot in a non-residential designation sufficient to enable the owner to derive some economically viable use of the parcel.

**Draft Monterey County Countywide Traffic Impact Fee Program.** Policies C-1.2 and C-1.8 of the County General Plan direct the County to develop a countywide traffic impact fee program. The purpose of the program is to raise funds from future development to pay its fair share cost of improvements to County road facilities related to impacts of individual projects on the County’s road network. The County has completed a nexus study to identify the improvements to the County circulation network to be funded through the program and to identify fair share fees to be assessed to new development. The fee program would replace the current methodology of assessing ad hoc fees for individual projects based on their individual impacts. Payment of the countywide fee would serve as mitigation for the cumulative impacts of new development on roadways that are not in the immediate vicinity individual projects (identified in the program as Tier 2 traffic impacts).

With several exceptions, none of which involve the City of Salinas, the fee program would apply to all new development within unincorporated Monterey County and within cities that are party to the fee program through a separate agreement signed with the County. The fee program is not anticipated to be applied within cities in the County for which a negotiated memorandum of understanding with the County has not been completed. The City and the County do not have a negotiated memorandum of agreement in this regard.
The countywide fee program includes improvements to several roadways in the immediate vicinity of the city. These include Crazy Horse Canyon Road (passing lanes/bike lanes), Espinosa Road (widen to four lanes with bike lanes between SR 183 and US. Highway 101), Harris Road (widen to four lanes from Harris Court to the city limit), Hebert Road/Old Stage Road (widen to four lanes, signals at three intersections, turn lanes/shoulder improvements, bike route signage), Rogge Road (signal at Rogge Road/San Juan Grade Road), and San Juan Grade Road (widen to four lanes, media, bike lanes, signal at Crazy Horse Canyon Road).

The countywide fee program has not yet been adopted by the County. As of spring 2017, an adoption date had not been identified. However, it is possible that the fee program will be adopted and in effect by the time that new development is proposed within the Target Areas. It is anticipated that future development projects within the Target Areas would be required to pay into the County fee program as designed to mitigate cumulative impacts on the County roadway system in effect at the time building permits are requested.

City of Salinas General Plan. The General Plan Circulation Element contains a range of policies that address transportation and alternative transportation. The following policies are particularly relevant to the proposed project:

**Policy C-1.2:** Strive to maintain traffic Level of Service (LOS) D or better for all intersections and roadways.

**Policy C-1.3:** Require that new development and any proposal for an amendment to the Land Use Element of the General Plan demonstrate that traffic service levels meeting established General Plan standards will be maintained on arterial and collector streets.

**Policy C-1.4:** Continue to require new development to contribute to the financing of street improvements, including formation of roadway maintenance assessment districts, required to meet the demand generated by the project.

**Policy C-1.5:** Ensure that new development makes provisions for street maintenance through appropriate use of gas tax and formation of maintenance assessment districts.

**Policy C-1.6:** Discourage diversion of traffic to local streets by providing maximum capacity on arterial streets and locating high traffic-generating uses on or near arterial frontages.

**Policy C-1.7:** Design roadway capacities to adequately serve planned land uses.
Policy C-1.10: Encourage car-pooling, at government offices, business, schools, and other facilities, to reduce the number of vehicles using the roadway system.

Policy C-2.2: Cooperate with Caltrans in making improvements to U.S. Highway 101 and support construction of Prunedale freeway improvements by Caltrans to serve through trips, and trips to and from Salinas.

Policy C-3.2: Design development and reuse/revitalization projects to be transit-oriented to promote the use of alternative modes of transit and support higher levels of transit service.

Policy C-3.4: Support public transportation that is “bike” friendly, such as buses with bicycle racks and reduced fares for bicycle riders and provision of bicycle racks at public transportation stations.

Policy C-4.1: Continue to develop a network of on- and off-street bicycle routes to encourage and facilitate the use of bicycles for commute, recreational, and other trips. Eliminate gaps and provide connections between existing bicycle routes.

Policy C-4.2: Increase availability of facilities, such as bike racks and well-maintained and well-lit bike lanes that promote bicycling.

Policy C-4.3: Encourage existing businesses and require new construction to provide on-premise facilities to aid bicycle commuters, such as on-site safe bicycle parking.

Policy C-4.4: Improve the biking environment by providing safe and attractive cut-throughs, bike lanes, and bike paths for both recreational and commuting purposes.

Policy C-4.5: Where possible, ensure that roadway improvements (i.e., widening and re-striping), as well as new overpasses and underpasses, allow for safe on-street bike lanes or adequate right-lane space for bicycles.

Policy C-4.7: Encourage parking lot designs that provide for safe and secure bicycle parking.
**Policy C-5.1:** Increase availability of safe and well-maintained sidewalks in all areas of the City.

**Policy C-5.2:** Encourage all new bus stops and changes in existing bus stops to take pedestrian access into consideration.

**Policy C-5.4:** Encourage parking lot designs that promote pedestrian access and safety.

**City of Salinas Traffic Improvement Program.** The City has an adopted traffic improvement program that helps fund transportation infrastructure improvements that become necessary as a result of new development. Traffic impact fees are paid by project developers to off-set the impacts of their projects on the City's circulation facilities. The fees are used for circulation network improvements that are designed to ensure that the City's circulation facilities operate at an acceptable level of service.

The City periodically updates the traffic impact fee amount to reflect costs to construct new circulation facilities or improve existing facilities. The *City of Salinas Traffic Improvement Program 2010 Update* (Wood Rogers 2010) (TIP) is the latest major update of the program. The TIP is implemented through the City's Traffic Fee Ordinance (TFO). The TIP and TFO reflect the costs of improving the circulation network to accommodate traffic volumes anticipated at buildout of the City as foreseen in the General Plan. For example, buildout of the City includes new growth within the City's Future Growth Areas. Two major projects currently under consideration by the City, the proposed West Area Specific Plan and Central Area Specific Plan, are located within the City's SOI and within a Future Growth Area, will be required to pay TFO fees to off-set their related traffic impacts on the City circulation network.

The General Plan and the TIP identify the specific circulation network improvements that are needed to mitigate circulation impacts as the City develops consistent with the General Plan. Several of the improvements are particularly relevant to the proposed project, as the traffic it would generate has been found to have a significant impact on a number of circulation facilities that are included in the TIP. A project applicant’s payment of the impact fee as established in the TFO is considered to be mitigation for project impacts on those facilities, provided the impacts of the project on the facilities were anticipated when the TIP was prepared.

The proposed project was not anticipated when the TIP was adopted. Therefore, the impacts of buildout of the Target Areas were not anticipated, and improvements needed to accommodate future development within the Target Areas were not included in the TIP. Further, because such development was not included, the traffic impact fees that must be paid by the developers of future projects within the Target Areas were not assumed to be available to support construction of long-term circulation improvements.
**City of Salinas Bikeways Plan.** The Salinas Bikeways Plan includes goals and actions along with maps identifying the City’s existing and proposed bikeways, bike parking facilities, bike support facilities, routes for buses with bike racks, and the design requirements for those facilities. A list of existing and planned bicycle facilities included in the 2002 Salinas Bicycle Plan is provided on starting on page 12 of the TIA in Appendix I.

The TIA exhibit shows that due to the location of Target Areas adjacent to existing developed portions of the City, existing and/or planned Class II or Class III bicycle routes are found adjacent to Target Areas N, L2, and V. There are no existing or planned bicycle routes on roadways adjacent to Target Areas K, B, or F. Development of the Target Areas was not envisioned at the time the Bicycle Plan was adopted. Therefore, if the City adopts the EDE, the Bicycle Plan may require amendment in the future to reflect the need to better integrate the Target Areas. The City is planning to update the Bicycle Plan as part of the General Plan update the City intends to initiate in 2018.

**City of Salinas Pedestrian Plan.** The Salinas 2004 Pedestrian Plan contains goals and strategies for improving and expanding pedestrian access and safety throughout the City. Goal 3 requires that new development be conditioned to install appropriate streets, sidewalks, pedestrian access ramps, traffic calming measures and related facilities to encourage walking. Future development within the Target Areas would be subject to such conditions. The City is planning to update the Pedestrian Plan as part of the General Plan update the City intends to initiate in 2018.

**Proposed EDE Policies**

The EDE contains policies and implementation actions which directly or indirectly address circulation impacts whose implementation may serve as mitigation for significant impacts. These include the following:

**Action LU-1.3.7:** Improve pedestrian, bicycle and vehicular connections from North Main Street to Carr Lake (Economic Opportunity Area S), continue to upgrade and expand the El Gabilan Library, as needed, and amend the Zoning Code, as needed, to incentivize investment by landowners.

**Action LU-1.3.9:** On the major Alisal Street corridors (Economic Opportunity Area U), a portion of which includes the Alisal Street/East Market Street Focused Growth Overlay Area, where feasible, widen sidewalks, install corridor meridians and enhanced crosswalks for pedestrian safety; create plazas, urban spaces and parks and provide landscaping, street furniture, and pedestrian-scale lighting. Create a
design aesthetic that reflects the culture of the community and provide enhanced code enforcement to enhance health and safety and create and maintain the character of the community.

**Policy ED-C-2.1:** Partner with TMC, Caltrans and other agencies to realize commuter rail service to Salinas from the San Francisco Bay Area, to focus City actions and investment to implement the Salinas Intermodal Transportation Center (SITC) Master Plan, including land acquisition and extension of Lincoln Avenue, and to promote transit-oriented, high-density residential, commercial, and office infill within the SITC plan area.

**Action C-2.1.1:** Create incentives for large employers and employment centers to locate in areas conducive to transit use and other alternative modes, particularly along existing or planned transit routes, the future Intermodal Transportation Center, and regional bicycle corridors.

**Action C-2.2.1:** Improve connectivity and vehicular/non-vehicular access within the downtown core area by implementing circulation and other connectivity-focused improvements identified in the Downtown Vibrancy Plan that link the intermodal transportation center, Chinatown, Alisal Marketplace, Carr Lake, and the Market Street corridor. Use greening, way-finding techniques, and a themed signage program for this purpose.

**Action C-2.2.2:** Evaluate and pursue a new fully functional U.S. Highway 101 interchange to Sherwood Drive to connect the center of the City with the Carr Lake area, including the downtown. Include extension of Casentini Street to Sherwood Drive and extension of Bridge Street to Casentini Street to provide access and enhance commercial value of vacant land adjacent to, and visible from freeway.

**Action C-2.3.1:** Create a focused plan for circulation improvements (vehicular and non-vehicular) to connect Constitution Boulevard through Carr Lake to Kern Street, Sherwood Drive and Highway 101, and better connect Market Street as a main access route to downtown.

**Action C-2.3.2:** Create a vehicular bridge over railroad tracks to connect East San Luis to Alisal Marketplace.

**Policy ED-C-2.6:** Plan, design, finance and construct an Eastside Expressway to facilitate agricultural business job growth at the southeast
end of the City (Economic Opportunity Area F), improve access for East Salinas workers to employment in Salinas and other areas, facilitate Future Growth Area development (Economic Opportunity Areas H and I), and provide a link to business park development (Economic Opportunity Area K) and the U.S. Highway 101/Russell Road interchange at the north end of the City.

**Policy ED-C-2.9:** Plan, design, finance and construct an extension of Blanco Road from Davis Road to State Highway 68 and southeast to the proposed new U.S. Highway 101/Eastside Expressway interchange at the south end of the City to function as a new Southside Expressway.

**Policy ED-C-2.13:** Prioritize the creation and enhancement of transit, bicycle, and pedestrian facilities in areas that will attract users. Such areas should include neighborhoods or corridors with high proportions of one- and zero-vehicle households, areas with high residential and/or employment density, concentrations of retail, cultural, and civic destinations and/or areas with reduced parking requirements.

**Action CA-1.2.5:** Beautify the pedestrian experience and increase safety by enhancing physical separation between pedestrian and automobile traffic. Significantly enhance street tree plantings along primary corridors. Add pedestrian-scaled street lights along corridor segments where enhanced pedestrian activity is desired.

### Standards of Significance

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subjects of transportation and traffic, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on these subjects, or indeed on any subject addressed in the checklist. (*Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (*Ibid.*) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here, though in doing so it has exercised its discretion to take the generalized wording of the Appendix G inquiries and has made it more concrete and specific. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:
• Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures.

The applicable circulation system performance standards are as follows:

**City of Salinas.** Significant impacts to facilities within the City’s jurisdiction would occur if the proposed project: a) causes roadway segment operations to deteriorate from an acceptable LOS D to LOS E or below, or 2) adds traffic to a roadway segment operating at LOS E or below.

**County and Caltrans.** Significant impacts to facilities within County or Caltrans jurisdiction would occur if the proposed project causes roadway segment operations to deteriorate from an acceptable LOS D to LOS E or below. LOS of D is the minimum level of service defined for Caltrans-operated highways.

The Appendix G questions on the subjects of transportation and traffic also give rise to additional thresholds that are not relevant to the proposed project given its very speculative nature. Under these (irrelevant) thresholds, significant impacts would result if a proposed project would:

• Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);

• Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;

• Result in inadequate emergency access; or

• Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Given the proposed project description, detailed plans for future individual projects within the Target Areas are not available. Potential circulation hazards associated within future individual projects will, therefore, be evaluated as part of the CEQA process conducted at the time individual projects are being considered. The same is true of potential emergency access issues associated with future development within the Target Areas. No further analysis of these issues is required.
The proposed project does not include actions that would result in changes in air traffic patterns or levels. No further analysis is required on these issues. Issues related to potential effects of the proposed project on and from City of Salinas Municipal Airport operations are described in Section 3.8, Hazards and Hazardous Materials, which concludes that no such effects will occur. Please refer to that section for more information.

As noted previously, development of the Target Areas was not envisioned when the General Plan, Pedestrian Plan and Bikeways Plan were adopted. Therefore, neither plan specifically addresses related facility demand that will be created by future employees working within the Target Areas. If the EDE is adopted by the City, the City will consider updating the Bikeways and Pedestrian plans to ensure that new or extended facilities needed to serve the Target Areas are included. At the level of project description information available for the proposed project, it would be speculative to identify specific improvement needs for individual Target Areas.

The specific plans required for individual Target Areas are the appropriate planning tool for identifying pedestrian and bicycle facilities needed within each Target Area and how the facilities will be integrated with existing, currently planned, and/or amended City plans for these facilities. In summary, the proposed project does not conflict with existing or proposed bicycle or pedestrian plans. This determination will be made and addressed as part of the applications and CEQA documentation prepared for specific plan/individual future development projects proposed within each Target Area. No further analysis is required.

Analytical, Impacts, and Mitigation

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target Areas (or potentially within Economic Development Reserve Areas) would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.
The impact discussion presented below is organized by the jurisdiction with responsibility over circulation facilities that would be impacted by the project. Impacts on City facilities are presented first, County facilities second, and Caltrans facilities third.

**IMPACT: TRAFFIC FROM YEAR 2045 BUILDOUT OF THE TARGET AREAS WOULD REDUCE THE LEVEL OF SERVICE ON SEVEN CITY ROAD SEGMENTS TO BELOW ACCEPTABLE LOS D (LESS THAN SIGNIFICANT WITH MITIGATION)**

**Circulation Network Impact Analysis Methodology**

The TIA analysis of project effects on the circulation network is based on use of the latest version of the City of Salinas’s Travel Demand Model. The City’s Travel Demand Model is an augmented version of the AMBAG Regional Travel Demand Model. AMBAG’s model covers the three-county region of Santa Cruz, Monterey and San Benito counties. To create the City’s model, additional details within the City regarding both land use projections and future roadway network improvements were added to the AMBAG regional model. The City’s model also includes a more robust (granular) set of Traffic Analysis Zone’s (TAZ) in order to better forecast traffic conditions within the City’s area of influence. Both models use TransCAD software which is an industry standard tool for this purpose used by metropolitan planning organizations, cities, counties and states to project future transportation conditions. The model was used to project traffic conditions in the year 2045, which is the assumed General Plan buildout year. The build out year is based on an assumed annual growth rate of 1.25 percent per year with a base year of 2010. The City’s model includes all of the approved and reasonably foreseeable growth anticipated in the Monterey Bay area by the year 2045. That growth includes two major projects, the proposed West Area Specific Plan and Central Area Specific Plan, both of which are located within the City’s SOI and within a Future Growth Area, and currently under consideration by the City.

Using the City’s model, the TIA assesses roadway segment Levels of Service on critical facilities within the City’s area influence for all facilities designated as a Collector or above. The AMBAG model is a four-step model, using trip generation, trip distribution, mode choice and trip assignment to create estimates for travel behavior and patterns.

The model was used to forecast travel to and from a specific area, or zone, based on the land use information for that zone. Land use information includes the number and size of households and the number and type of jobs. The employment projections associated with the EDE were added to the applicable zones.

**2045 Target Area Buildout as TIA Impact Analysis Scenario.** A TIA commonly includes analysis of traffic impacts under several different scenarios. Existing traffic conditions are
3.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

commonly evaluated first. Traffic from a proposed project is then considered in combination with existing conditions to determine a proposed project’s traffic effects under existing conditions. Projected cumulative traffic conditions are then evaluated for a selected long-term target year. That target year is commonly the buildout year or a long-term development scenario year in a long-range planning document such as a general plan, or may be based on a list of cumulative projects identified by the lead agency. The traffic projected from a project in the long-term target year is then considered in combination with the cumulative condition without the project to determine the cumulative impacts created by the project. Because the proposed project is designed to expand land capacity to support employment generation through General Plan buildout, and General Plan buildout is projected to be 2045, the TIA the uses the year 2045 as the buildout year for the TIA analysis.

In the near- to mid-term time horizon, the City will continue to prioritize directing new development to infill sites and vacant sites within its SOI. The point in time at which any one or more of the Target Areas could begin to develop is unknown and considered to be speculative. Before future development could occur in any of the Target Areas, the City must approve the EDE as a general plan amendment; apply to LAFCO to amend the City’s SOI, annex, and prezone one or more of the Target Areas; receive and consider project-specific development applications; and prepare project-specific CEQA documentation. For these reasons, the TIA does not include an existing conditions plus project traffic impact analysis scenario, but rather uses a 2045 baseline year.

Evaluation of an existing plus project scenario was not conducted as it would provide misleading results and conclusions. The development contemplated in the Target Areas (EDE) is long term and programmatic in nature and the document’s recommendations are intended as long-term planning guidance. Assuming the construction and occupancy of the development proposed in the Target Areas against existing traffic volumes would be inappropriate. The City has a number of pending development projects (and many others in the pipeline) that would impact traffic levels. Recent and long term demographic trends demonstrate a steady growth in population and associated traffic levels. In addition, the City has a fully developed and approved Traffic Fee Ordinance that is collecting funds and systematically building out the City’s General Plan roadway network.

Traffic effects identified under an existing plus project scenario would be speculative given the long-term buildout horizon for the Target Areas, and would not be meaningful given that they are highly unlikely to occur. Such an analysis would substantially overestimate the actual potential impacts of the proposed project. As a result, mitigation requirements would be substantially overestimated and costs to implement mitigations would be substantially inflated. Rather, the TIA evaluates projected traffic conditions in 2045 without the project as a baseline, then identifies impacts of the EDE by adding traffic from buildout of the Target Areas to the affected road network. The year 2045 analysis year is a reasonable Target Area buildout time.
horizon as it is synonymous with the projected General Plan buildout year. Even so, it is possible that the results of the TIA analysis may be conservative, as it is possible Target Area buildout may not occur until after 2045.

**Analysis Focused on Roadway Segments.** Consistent with the City’s General Plan, the traffic analysis evaluates conditions on key roadway segments located throughout the City. Because the EDE is programmatic and lacks specific site plans or internal roadway networks, the evaluation of key roadway segment performance was selected as the appropriate unit of analysis for this study. Traffic conditions on roadway segments will capture and accurately describe the potential impacts of the project on the transportation network, allowing for appropriate and commensurate mitigation measures to be developed.

**Assumed Road Network Improvements in 2045.** The road network in 2045 is assumed to consist of existing roadways and roadways proposed in the General Plan.

**Trip Generation and Distribution.** Typically trip generation rates that are available from the Institute of Transportation Engineers are employed to estimate the number of vehicle trips that are expected from development projects. The trip generation rates used in the TIA are shown in Table 8 of the TIA. As indicated, the proposed project would result in over approximately 21,897 new daily vehicle trips, with 4,576 trips. These trips were distributed onto the existing/future road network as part of the modeling process. This enables the model to determine trip volumes on study road segments that will result in LOS changes, including LOS levels below D that trigger significant impacts.

**2045 City Roadway Conditions without the Proposed Project**

The TIA includes evaluation of year 2045 projected road segment levels of service without the proposed project. Table 9 of the TIA lists TIA study segments under City, County and Caltrans control and identifies projected LOS conditions in 2045 resulting from traffic volumes generated by anticipated growth in population and other land use factors included in the General Plan. Table 37, Significantly Impacted City Road Segments – 2045 Without the Proposed Project, shows the segments within the City that would operate below the City’s LOS D threshold.

**2045 City Roadway Conditions with the Proposed Project**

The TIA includes analysis of impacts on City road segments that would occur when traffic from buildout of the Target Areas is added to the 2045 condition without the proposed project. Table 38, Significantly Impacted City Road Segments – 2045 with the Proposed Project, shows the City road segments on which significant impacts would occur with the addition of traffic from the Target Areas. These segments are illustrated with dashed lines in Figure 20, Road Segment Impacts with the Proposed Project, and summarized in Table 38. Note that Figure 20 also includes segments that are impacted under 2045 conditions without the proposed project.
Table 37  Significantly Impacted City Road Segments – 2045 without the Proposed Project

<table>
<thead>
<tr>
<th>Road Segment</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bernal Drive between N. Main Street and Sherwood Drive/Natividad Road</td>
<td>E</td>
</tr>
<tr>
<td>Davis Road between West Market Street and Central Avenue</td>
<td>F</td>
</tr>
<tr>
<td>E. Alisal Street between Williams Road/John Street and Bardin Road</td>
<td>F</td>
</tr>
<tr>
<td>E. Laurel Drive between Williams Road and N. Sanborn Road</td>
<td>E</td>
</tr>
<tr>
<td>Front Street between Alisal Street and E. Market Street</td>
<td>E</td>
</tr>
<tr>
<td>Harris Road west of Abbott Street (City segment)</td>
<td>F</td>
</tr>
<tr>
<td>Independence Boulevard between Constitution Boulevard and E. Boronda Road</td>
<td>E</td>
</tr>
<tr>
<td>McKinnon Street between Alvin Drive and E. Boronda Road</td>
<td>F</td>
</tr>
<tr>
<td>Natividad Road between E. Bernal Drive and E Laurel Drive</td>
<td>F</td>
</tr>
<tr>
<td>Russell Road between Van Buren Avenue and San Juan Grade Road</td>
<td>E</td>
</tr>
<tr>
<td>San Juan Grade Road between Boronda and Van Buren Avenue</td>
<td>E</td>
</tr>
<tr>
<td>Sherwood Drive between U.S. Highway 101 and Natividad Road</td>
<td>E</td>
</tr>
<tr>
<td>W. Laurel Drive between U.S. Highway 101 and Adams Street</td>
<td>F</td>
</tr>
</tbody>
</table>

Source:  Fehr & Peers 2017

Table 38  Significantly Impacted City Road Segments – 2045 with the Proposed Project

<table>
<thead>
<tr>
<th>Road Segment</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bernal Drive between N. Main Street and Sherwood Drive/Natividad Road</td>
<td>E</td>
</tr>
<tr>
<td>E. Harris Road west of Abbott Street (City segment)</td>
<td>F</td>
</tr>
<tr>
<td>Natividad Road between East Bernal Drive and East Laurel Drive</td>
<td>F</td>
</tr>
<tr>
<td>Old Stage Road between Natividad Road and Russell Road Extension</td>
<td>E</td>
</tr>
<tr>
<td>Russell Road between Van Buren Avenue and San Juan Grade Road</td>
<td>F</td>
</tr>
<tr>
<td>San Juan Grade Road between Boronda and Van Buren Avenue</td>
<td>E</td>
</tr>
<tr>
<td>W. Laurel Drive between U.S. Highway 101 and Adams Street</td>
<td>F</td>
</tr>
</tbody>
</table>

Source:  Fehr & Peers 2017

Impacts on all of the City road segments can be mitigated to less than significant with implementation of the following mitigation measures.
Future LOS with Project

- LOS [E] no project impact
- LOS [E] with Mitigation
- LOS [F] no project impact
- LOS [F] with Mitigation

Source: City of Salinas

Figure 20
Salinas Economic Development Element Program EIR NOP
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Mitigation Measures

TRANS-1. Required improvements to the segment of Bernal Drive between N. Main Street and Sherwood Drive/Natividad Road are included in the City’s TFO (Project 33B). The improvements would assure that operations of the road segment are improved to LOS D or better. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City's TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.

TRANS-2. Required improvements to the segment of Russell Road between Van Buren Avenue and San Juan Grade Road are included in the City’s TFO (Project 12). The improvements identified in the TFO would assure that operations of the road segment are improved to LOS D or better. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City's TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.

TRANS-3. Required improvements to the segment of Old Stage Road between Natividad Road and the Russell Road Extension are included in the City’s TFO (Project 8). The improvements identified in the TFO would assure that operations of the road segment are improved to LOS D or better. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City's TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.

TRANS-4. Required improvements to the segment of San Juan Grade Road between Boronda Road and Van Buren Avenue are included in the City's TFO (Project 13). The improvements identified in the TFO would assure that operations of the road segment are improved to LOS D or better. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City's TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.

TRANS-5. The City will add the required improvements to the segment of E. Harris Road west of Abbott Street that is controlled by the City to the City’s TFO. The improvements include widening the road from two to four 4 lanes. Right-of-way must be acquired for this purpose. The improvements would improve operations to LOS D. The TFO will be updated to include this improvement project prior to approval of any individual
3.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

development proposed within any of the Target Areas. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City’s TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.

TRANS-6. The City will add the required improvements to the segment of Natividad Road between East Bernal Drive and East Laurel Drive to the City’s TFO. The improvements include widening the road from four to six lanes. Right-of-way must be acquired for this purpose. The improvements would improve operations to LOS D. The TFO will be updated to include this improvement project prior to approval of any individual development proposed within any of the Target Areas. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City’s TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.

TRANS-7. The City will add the required improvements to the segment of West Laurel Drive between U.S. Highway 101 and Adams Street to the City’s TFO. The improvements include widening the road from four to six lanes in total. Right-of-way must be acquired for this purpose. The improvements would improve operations to LOS C. The TFO will be updated to include this improvement project prior to approval of any individual development proposed within any of the Target Areas. Payment of the TFO fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment. Prior to issuance of building permits for individual projects within the Target Areas, individual project developers shall pay the City’s TFO fee in effect at the time that building permits are issued. Payment of the fee represents the fair-share contribution of the projects to mitigating their respective impacts on this road segment.

IMPACT: TRAFFIC FROM YEAR 2045 BUILDOUT OF THE TARGET AREAS WOULD REDUCE THE LEVEL OF SERVICE ON FIVE COUNTY ROAD SEGMENTS AND ONE CALTRANS ROAD SEGMENT TO BELOW ACCEPTABLE LOS D (SIGNIFICANT AND UNAVOIDABLE)

2045 County/Caltrans Roadway Conditions Without with the Proposed Project

The TIA includes evaluation of road segment levels of service without the proposed project. Table 9 of the TIA lists study road segments under City, County and Caltrans control and identifies projected LOS conditions in 2045 resulting from traffic volumes generated by anticipated growth in population and other land use factors included in the General Plan.
Table 39, Significantly Impacted County/Caltrans Road Segments – 2045 without the Proposed Project, shows the segments within the County that would operate below the County’s LOS D threshold and below the CMP LOS D threshold assumed for Caltrans operated facilities in absence of new development within the Target Areas.

Table 39 Significantly Impacted County/Caltrans Road Segments – 2045 without the Proposed Project

<table>
<thead>
<tr>
<th>Road Segment</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alisal Road between E. Alisal Street and Hartnell Road</td>
<td>F</td>
</tr>
<tr>
<td>Blanco Road west of Davis Road</td>
<td>F</td>
</tr>
<tr>
<td>Castroville Road (SR 183) between Espinosa Road and SR 156 (Caltrans)</td>
<td>F</td>
</tr>
<tr>
<td>Crazy Horse Canyon Road south of U.S. Highway 101</td>
<td>E</td>
</tr>
<tr>
<td>Davis Road south of Blanco Road</td>
<td>F</td>
</tr>
<tr>
<td>Harris Road west of Abbott Street (segment outside the city limit)</td>
<td>F</td>
</tr>
<tr>
<td>Harrison Road between Russell Road and Sala</td>
<td>F</td>
</tr>
<tr>
<td>John Street (SR 68) between Abbott Street and U.S. Highway 101 (Caltrans)</td>
<td>F</td>
</tr>
<tr>
<td>N. Main Street (SR 183) between U.S. Highway 101 and Rossi Street (Caltrans)</td>
<td>F</td>
</tr>
<tr>
<td>S. Main Street (SR 68) between Blanco Road and Hunter Lane</td>
<td>E</td>
</tr>
<tr>
<td>San Miguel Canyon Road between Castroville Boulevard and Strawberry Road</td>
<td>F</td>
</tr>
<tr>
<td>San Miguel Canyon Road between U.S. Highway 101 and Castroville Boulevard</td>
<td>F</td>
</tr>
<tr>
<td>W. Market Street between N. Davis Road and McFadden Road</td>
<td>F</td>
</tr>
</tbody>
</table>

Source: Fehr & Peers 2017

2045 County/Caltrans Roadway Conditions with the Proposed Project

The TIA includes analysis of impacts on County and Caltrans road segments that would occur when traffic from buildout of the Target Areas is added to the 2045 condition without the proposed project. Table 40, Significantly Impacted County/Caltrans Road Segments – 2045 with the Proposed Project, shows the three County road segments and the one Caltrans road segment on which significant impacts would occur with the addition of traffic from the Target Areas. These segments are illustrated with dashed lines in Figure 20, Road Segment Impacts with the Proposed Project, and summarized in Table 40. Note that Figure 20 also includes segments that are impacted under 2045 conditions without the proposed project.
3.0 Environmental Setting, Impacts and Mitigation Measures

Table 40  Significantly Impacted County/Caltrans Road Segments – 2045 with the Proposed Project

<table>
<thead>
<tr>
<th>Road Segment</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alisal Road between E. Alisal Street and Hartnell Road (County)</td>
<td>F</td>
</tr>
<tr>
<td>Castroville Road (SR 183) between Espinosa Road and SR 156 (Caltrans)</td>
<td>F</td>
</tr>
<tr>
<td>Crazy Horse Canyon Road south of U.S. Highway 101 (County)</td>
<td>F</td>
</tr>
<tr>
<td>Espinoza Road west of U.S. Highway 101 (Partial/Both)</td>
<td>F</td>
</tr>
<tr>
<td>Harris Road west of Abbott Street (County portion outside the city limits)</td>
<td>F</td>
</tr>
<tr>
<td>San Juan Grade Road between Hebert Road and Crazy Horse Canyon Road (County)</td>
<td>E</td>
</tr>
</tbody>
</table>

Source: Fehr & Peers 2017

Improvements required to mitigate impacts on these segments are summarized below, along with a discussion about the absence of programs available to fund mitigation of the improvements. The absence of mitigation programs renders the impacts on these segments significant and unavoidable.

- **Alisal Road between E. Alisal Street and Hartnell Road**
  
  To mitigate the impact on this road segment, it must be widened from two to four lanes. This would provide acceptable LOS B conditions. This would require acquisition of right-of-way across adjacent agricultural land.

- **Castroville Road (SR 183) between Espinosa Road and SR 156**
  
  To mitigate the impact on this road segment, it must be widened from two to four lanes. This would provide acceptable LOS C conditions. This would require acquisition of right-of-way across adjacent agricultural land.

- **Crazy Horse Canyon Road south of U.S. Highway 101**
  
  To mitigate the impact on this road segment, it must be widened from four to six lanes. This would provide acceptable LOS A conditions. This would require acquisition of right-of-way from adjacent, largely undeveloped land.

- **Espinoza Road west of U.S. Highway 101**
  
  This would require acquisition of right-of-way from adjacent agricultural land. Harris Road west of Abbott Street (County segment). To mitigate the impact on this road...
segment, it must be widened from two to four lanes. This would provide acceptable LOS C conditions. This would require acquisition of right-of-way across adjacent agricultural land and land in light industrial use.

- San Juan Grade Road between Hebert Road and Crazy Horse Canyon Road

To mitigate the impact on this road segment, it must be widened from two to four lanes. This would provide acceptable LOS C conditions. This would require acquisition of right-of-way from adjacent agricultural land.

Per CEQA Guidelines section 15130(a)(3), if a program(s) is in place to fund circulation improvements designed to mitigate the impacts of cumulative development on an affected road network, payment of fair share fees described in the mitigation program(s) by developers of projects that contribute to the impacts serves as adequate mitigation for the impacts. To mitigate its impacts on the County and Caltrans facilities listed above to less than significant, new development within the Target Areas would need to pay its fair share of the costs of the noted improvements.

Improvements to the impacted segment of SR 183 are within the jurisdiction and responsibility of Caltrans, not the City. Developers of future individual future projects within the Target Areas could mitigate the cumulative impacts of their projects on the impacted County and Caltrans facilities, through the payment of traffic fees identified in applicable traffic fee program(s) designed to mitigate these impacts if such programs were available.

**County Road Segment Impacts.** Improvements to the five impacted County road segments are within the jurisdiction and responsibility of the County, not the City. As noted in the Regulatory Setting section above, the County has prepared a draft Countywide Traffic Impact Fee program. The program had not yet been adopted by the date this EIR was released for public review by the City and adoption is not expected before the City certifies this program EIR. The County can and should adopt the fee program. While it is quite possible, there is no assurance that a County program will be adopted and available by the time future individual development projects are proposed within the Target Areas. Consequently, impacts on the noted County segments are conservatively assumed to be significant and unavoidable, as it is assumed that no mechanism would be available to enable payment of fair share fees as mitigation.

If the County program (or a similar program serving the same purpose) is adopted prior to development occurring in the Target Areas and the City has officially agreed to participate in the program, payment of the fee by developers of individual projects within the Target Areas would mitigate the cumulative impacts of their projects on the County road network to less than significant. If a mitigation program is adopted, the CEQA documentation prepared for each
project proposed within the Target Areas would identify this fact and that payment of applicable fees would serve as adequate mitigation for the contribution of individual projects to the cumulative impacts.

**Caltrans Road Segment Impact.** Improvements to the impacted segment of SR 183 are within the jurisdiction and responsibility of the Caltrans. Cumulative impacts of development in the County on a number of Caltrans facilities are addressed in the TAMC Regional Fee program. However, improvements needed to SR 183 to mitigate the cumulative project impacts on this facility are not included in the Regional Fee program. Therefore, payment of the Regional Fee by individual Target Area project developers would not mitigate the contribution of their projects to the cumulative impact. Caltrans does not have a separate mechanism in place to collect fees from individual projects to mitigate impacts on specific Caltrans facilities.

If TAMC were to modify the Regional Fee Program to include the impacted segment of SR 183, payment of the Regional Fee by developers of individual projects within the Target Areas would mitigate the cumulative impacts of their projects on SR 183 to less than considerable. However, since there is no assurance that TAMC will take this action, the contributions of individual projects to the impact are assumed to be significant and unavoidable.

If the TAMC Regional Fee program is adjusted as noted above before development occurs within the Target Areas, the CEQA documentation prepared for each proposed project would identify this fact and that payment of applicable fees would serve as adequate mitigation for the contribution of individual projects to the cumulative impacts.

**IMPACT: TRAFFIC FROM YEAR 2045 BUILDOUT OF THE TARGET AREAS WOULD REDUCE THE LEVEL OF SERVICE ON FOUR CALTRANS OPERATED U.S. HIGHWAY 101 SEGMENTS TO BELOW ACCEPTABLE LOS D (LESS THAN SIGNIFICANT)**

**2045 U.S. Highway 101 Conditions without the Proposed Project**

The TIA includes evaluation of year 2045 road segment levels of service on U.S. Highway 101 without the proposed project. Table 10 of the TIA lists the highway segments under Caltrans control that were included in the analysis and identifies projected LOS conditions in 2045 resulting from traffic volumes generated by anticipated growth in population and other land use factors included in the General Plan. Table 41, Significantly Impacted Caltrans U.S. Highway 101 Segments – 2045 Without the Proposed Project, shows the highway segments that would operate below the LOS D threshold (identified previously as the highway performance standard identified in the County CMP).
Table 41  Significantly Impacted Caltrans U.S. Highway 101 Segments – 2045 without the Proposed Project

<table>
<thead>
<tr>
<th>U.S. Highway 101 Segment</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Highway 101 between Boronda Road and Russell Road</td>
<td>D</td>
</tr>
<tr>
<td>U.S. Highway 101 between Crazy Horse Canyon Road and San Juan Road</td>
<td>E</td>
</tr>
<tr>
<td>U.S. Highway 101 between John Street (SR 68) and Market Street</td>
<td>E</td>
</tr>
<tr>
<td>U.S. Highway 101 between Laurel Drive and East Boronda Road</td>
<td>E</td>
</tr>
<tr>
<td>U.S. Highway 101 between Main Street (SR 183) and Laurel Drive</td>
<td>E</td>
</tr>
<tr>
<td>U.S. Highway 101 between Market Street and Main Street (SR 183)</td>
<td>E</td>
</tr>
<tr>
<td>U.S. Highway 101 between Russell Road and SR 156</td>
<td>D</td>
</tr>
<tr>
<td>U.S. Highway 101 between San Miguel Canyon Road and Crazy Horse Canyon Road</td>
<td>D</td>
</tr>
<tr>
<td>U.S. Highway 101 between SR 156 and San Miguel Canyon Road</td>
<td>F</td>
</tr>
</tbody>
</table>

Source:  Fehr & Peers 2017

2045 Caltrans U.S. Highway 101 Segment Conditions with the Proposed Project

The TIA includes analysis of impacts on U.S. Highway 101 segments that would occur when traffic from buildout of the Target Areas is added to the 2045 condition without the proposed project. Table 42, Significantly Impacted Caltrans U.S. Highway 101 Segments – 2045 with the Proposed Project, shows the highway road segments on which significant impacts would occur with the addition of traffic from the Target Areas. These segments are illustrated in Figure 20, Road Segment Impacts with the Proposed Project. Note that Figure 20 also includes segments that are impacted under 2045 conditions without the proposed project – the impacts that are solely attributable to the project are summarized in Table 42.

The impact on each of these highway segments would be reduced to less than significant by widening the highway from four to six lanes. Expansion of the freeway will require the acquisition of property, as well as the reconstruction of ramps at Boronda Road, West Laurel Drive, North Main Street, and Kern Street to accommodate the new lanes. The Sherwood Drive overpass would also need to be retrofitted to ensure that it is long enough to span the new lanes.

As described in the Regulatory Setting section above, TAMC has included the “U.S. Highway 101 - Salinas Corridor - widen U.S. Highway 101 to 6 lanes within the existing right of way at locations where feasible” as a project included in the RTP. This project is also included in TAMC’s Regional Development Impact Fee Program. Payment of the regional fee by individual project developers whose projects contribute to impacts on the U.S. Highway 101 corridor
(including the four highway segments identified in Table 42 below), is considered to be adequate mitigation for impacts of their individual projects on the highway and would be required as a condition of project approval. At the time building permits are requested, developers of future projects within the Target Areas would be required to pay traffic fees defined in the TAMC Regional Fee program and in any other fee program that has been adopted at that time that is designed to mitigate cumulative impacts on the regional highway system. No mitigation measures are required.

Table 42  Significantly Impacted Caltrans U.S. Highway 101 Segments – 2045 with the Proposed Project

<table>
<thead>
<tr>
<th>U.S. Highway 101 Segment</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Highway 101 between John Street (SR 68) and Market Street</td>
<td>E</td>
</tr>
<tr>
<td>U.S. Highway 101 between Main Street (SR 183) and Laurel Drive</td>
<td>F</td>
</tr>
<tr>
<td>U.S. Highway 101 between Laurel Street and Boronda Road</td>
<td>E</td>
</tr>
<tr>
<td>U.S. Highway 101 between Market Street and Main Street (SR 183)</td>
<td>E</td>
</tr>
</tbody>
</table>

Source:  Fehr & Peers 2017

The highway widening improvements would also be partially funded through fees collected by the City as part of its TFO. Highway improvements are captured in the City’s TFO program as Project 32.

3.13 WASTEWATER

Wastewater from new development within the Target Areas must be conveyed and treated. This section of the EIR includes evaluation of the adequacy of wastewater conveyance and treatment facilities and capacities to accommodate the new development, whether treatment can be accomplished while meeting regulatory requirements, and whether new conveyance and/or treatment facilities are required. Information in this section is derived from a variety of sources including:

- City of Salinas General Plan Final Program EIR (Cotton/Bridges/Associates 2002);
- City of Salinas Sewer System Management Plan (City of Salinas 2014);
- Monterey One Water Pure Water Monterey/Groundwater Replenishment Project Final EIR (Denise Duffy & Associates 2015); and
No comments on wastewater issues were received on the NOP.

**Environmental Setting**

**Wastewater and Recycled Water Service**

The provision of sanitary sewer/wastewater service in the City of Salinas is organized at two levels. The City is responsible for maintenance and extension of sewer lines within its boundaries, and Monterey One Water is responsible for development and operation of regional treatment facilities, trunk main pipelines, and pump stations.

The City operates two separate wastewater systems. Sanitary wastewater, which is generated largely by households, commercial businesses, and offices, is conveyed via a system of City operated collection pipes to the Monterey One Water Salinas Pump Station. The Salinas Pump Station is located at 146 Hitchcock Road. From the Salinas Pump Station, wastewater is conveyed through Monterey One Water facilities to the regional treatment plant, located north of Marina. The City of Salinas also owns and operates an industrial wastewater conveyance and treatment system. The industrial sewer system is separate from the sanitary sewer system. Industrial wastewater is collected from industrial uses located in southeastern Salinas and transported to the City’s industrial wastewater treatment facility (the Salinas Treatment Facility) located west of Salinas, north of Davis Road and adjacent to the Salinas River. Industrial wastewater is also shunted directly to the regional treatment plant via the Salinas Pump Station during certain times of the year. This occurs when flows to the regional plant must be supplemented to enable production of recycled water for agricultural use.

**Monterey Regional Water Pollution Control Agency**

**Regional Treatment Plant.** Monterey One Water, created in 1972, currently serves a population of approximately 250,000 and operates a regional wastewater system that consists of treatment, disposal, and reclamation facilities. Monterey One Water system provides centralized wastewater treatment for cities and communities of northern Monterey County through a network of wastewater pump stations and pressure pipelines that convey wastewater to the regional treatment plant for treatment, disposal, and recycling. The regional treatment plant primarily treats municipal wastewater.

Wastewater at the regional treatment plant is treated to secondary treatment standards for discharge through the Monterey One Water outfall to the Monterey Bay or for use as influent for the tertiary treatment system that produces recycled water for crop irrigation. Recycled water is produced at Monterey One Water’s Salinas Valley Reclamation Plant, which is co-located at the regional treatment plant, for irrigation of farmland in the northern Salinas Valley in the area referred to as the Castroville Seawater Intrusion Project area.
The regional plant has an average dry weather design capacity of 29.6 million gallons per day (MGD) and a peak wet weather design capacity of 75.6 mgd. It currently receives and treats approximately 16 to 17 MGD of wastewater, and therefore, has existing capacity to treat additional flows.

The volume of wastewater treated at the regional treatment plant varies throughout the year, with the highest flows occurring during the non-irrigation season (November through March). The lowest flows occur during the irrigation season (April through October) when a large portion of the secondary effluent from the regional treatment plant is diverted to the Salinas Valley Reclamation Plant for additional tertiary treatment and subsequent use for crop irrigation within the Castroville Seawater Intrusion Project area.

A forty-year wastewater flow projection analysis was conducted as part of the planning process for the Monterey One Water Groundwater Replenishment Project (GWR Project). The projections were based on review of historical population changes and historical wastewater flow data, which were used to calculate average flow generated per person in units of gallons per capita per day (gpcd) for the years 2000 through 2012. Trends in population in each community and trends regarding improved water conservation, in part due to state legislation such as CalGreen, were projected forward to the year 2055, and wastewater flow projections were calculated from these trends.

The amount of wastewater that the plant receives and treats has been decreasing over time. It is projected that wastewater flows to the regional treatment plant will continue to decrease until approximately the year 2030, when per capita flows are projected to reach a minimum of between 17.1 and 19.2 MGD. Flows are projected to increase after 2030 and may range between 22.7 and 24.3 MGD by the year 2055, or 77 percent to 82 percent of regional treatment plant design capacity (Brezack & Associates, Inc. 2014). The existing regional treatment plant, therefore, has capacity to treat projected future flows with additional capacity remaining.

**Regional Sewer Collection System.** Monterey One Water operates the Salinas Pump Station, a pump station that serves Salinas. The pump station is located on Hitchcock Road, a half mile southeast of the intersection of Blanco and Davis roads at the site of the City's former municipal wastewater treatment plant, known as Treatment Plant No. 1 or “TP1.”

Municipal wastewater is conveyed from the Salinas Pump Station to the regional treatment plant in a 36-inch diameter interceptor force main pipeline that is approximately 7.5 miles in length. The average daily and peak flows through the pump station have been relatively constant at approximately 12 MGD and 25 MGD, respectively, over the last several years (Denise Duffy & Associates 2015). Flows at the pump station are highest during summer months when the population of Salinas expands due to the large migrant workforce associated with the agricultural industry. The City has embarked on a collection system improvement program and
has reduced winter infiltration and inflow of stormwater into the municipal wastewater system and has thereby reduced total flows reaching the pump station. Monterey One Water flow testing of the pump station has indicated a pumping capacity of 32.8 to 35.4 MGD (assuming one pump is out of service), and a total capacity of 38.5 MGD with all pumps running.

**City Industrial Wastewater Conveyance and Treatment System**

The City’s industrial wastewater conveyance system consists of approximately 24,000 linear feet of pipe that serves approximately 25 agricultural processing and related businesses located in the southeastern area of Salinas.

This industrial wastewater collection system is separate from the Salinas municipal sewage collection system and includes 14-inch to 33-inch diameter gravity pipelines in which wastewater flows to the Salinas Pump Station site, then flows into a 42-inch gravity pipeline to the Salinas Treatment Facility. The facility was originally constructed in 1943 and has been expanded several times, with the last major expansion in 1973 when surface aerators were added.

The Salinas Treatment Facility consists of an influent pump station, an aeration lagoon, percolation ponds, and rapid infiltration beds to treat, percolate and evaporate the industrial wastewater. Wastewater is treated in a 13-acre aeration lagoon and then discharged by gravity to a series of three percolation/evaporation ponds that have a total surface area of 100 acres. Any remaining wastewater is disposed in 54 shallow beds that are alternatively loaded with treated effluent for disposal by percolation and evaporation. The disposal drying beds have a design disposal rate of 1.7 MGD.

Over eighty percent of the wastewater flows in this system are from fresh vegetable packing facilities (typically, wash water used on harvested row crops), and the remainder of flows originate from businesses associated with seafood processing, refrigerated warehousing, manufactured ice, preserves (frozen fruits, jams and jellies) and corrugated paper boxes.

The Salinas Treatment Facility is designed and permitted for an average daily flow of 4.0 MGD with a peak flow of 6.8 MGD. The treatment facility operates year-round, with a current peak monthly inflow during summer months of approximately 3.5 to 4 MGD (annual average of 3.0 MGD). This summer peak corresponds with the peak agricultural harvesting season in the Salinas Valley. In recent years, substantial flows to the Salinas Treatment Facility have continued during the winter months due to the importation of agricultural products from out of state for processing. The treatment facility does not currently produce recycled water.

Several industrial wastewater conveyance system improvement needs have been identified. These consist largely of the replacement/expansion of segments of several conveyance mains that transport wastewater from existing industrial areas to the Salinas Pump Station and from
that site to the Salinas Treatment Plant. Based on the recent approval of Monterey One Water’s Groundwater Replenishment Project (GWR Project) as described below and that project’s contemplated use of the City’s industrial wastewater as source water for producing recycled water, the City may not need additional industrial wastewater treatment capacity. Over time, industrial wastewater had seasonally been shunted directly to the regional treatment plant rather than being delivered to the Salinas Treatment Plant. As part of the GWR project, industrial wastewater will be delivered to the regional treatment plant for recycling and reuse.

Land within the proposed Target Areas is not currently connected to the City’s municipal or industrial wastewater treatment conveyance systems. Such improvements would be needed to support development of the Target Areas.

**Monterey One Water Groundwater Replenishment Project**

The GWR Project is proposed by Monterey One Water in partnership with the Monterey Peninsula Water Management District. The GWR Project consists of two components: the Pure Water Monterey Groundwater Replenishment improvements and operations that would develop purified recycled water to replace existing urban supplies; and an enhanced agricultural irrigation component that would increase the amount of recycled water available to the existing Castroville Seawater Intrusion Project agricultural irrigation system. The GWR Project includes use of municipal wastewater, industrial wastewater, urban stormwater runoff, and surface water diversions as sources to produce recycled water for municipal and agricultural use.

The primary purpose of the GWR Project is to provide high quality replacement water to allow California American Water Company to extract 3,500 acre-feet per year (AFY) more water from the Seaside Groundwater Basin for delivery to its customers in the Monterey District service area and reduce Carmel River water use by an equivalent amount. To meet this objective, the GWR Project would create a reliable source of water supply by using source waters described above to produce highly-treated water using existing secondary treatment processes and a new Advanced Water Treatment Facility at the regional treatment plant. After treatment at the new facility, the purified recycled water would be conveyed using two pump stations and a new pipeline and would be injected into the Seaside Groundwater Basin using a series of shallow and deep injection wells. Once injected into the Seaside Groundwater Basin, the treated water would mix with the groundwater present in the aquifers and be stored for future urban use. California American Water Company would use existing wells and improved potable water supply distribution facilities to extract and distribute water from the Seaside Groundwater Basin, enabling it to reduce diversions from the Carmel River by the same amount. The water company is under a State order to secure replacement water supplies and cease over-pumping of the Carmel River.
The GWR Project includes improvements that enable agricultural wastewater currently conveyed to the Salinas Treatment Facility to be diverted to the regional treatment plant to be recycled. A shunt designed for this purpose has already been installed. The GWR Project also would include improvements at the Salinas Treatment Facility to allow storage of agricultural wash water and stormwater collected from the south Salinas area in the winter and recovery of that water for recycling and reuse in the spring, summer, and fall. The GWR Project is anticipated to source approximately 2,710 AFY, or approximately 2.4 MGD, of the City’s industrial wastewater (Denise Duffy & Associates 2015).

The Monterey One Water Board of Directors certified the GWR Project Final EIR and approved the GWR Project on October 8, 2015. As of the time of preparation of this draft EIR, the GWR Project is undergoing permitting and approval from local, regional, state, and federal agencies to enable construction and implementation. The GWR Project is planned for initial operations by late 2017.

**GWR Project and City Industrial Treatment Facility**

Eighty to ninety percent of the industrial wastewater conveyed to the Salinas Treatment Facility is comprised of agricultural processing wash water. Wastewater is treated by aeration, and disposal is by evaporation and percolation to groundwater. To use water from this source for the GWR Project, this water would be diverted to the existing Salinas Pump Station using a new diversion structure and new pipelines connecting the existing industrial conveyance pipeline to the existing municipal wastewater system just prior to the Salinas Pump Station. The agricultural wash water would then mix with the municipal wastewater and be conveyed through the existing 36-inch diameter Salinas interceptor to the regional treatment plant. A temporary connection was installed in April 2014, allowing diversion of all agricultural wash water to the regional treatment plant to augment the Salinas Valley Reclamation Plant production of recycled water during the current drought, to provide data regarding treatability of the agricultural wash water (with and without municipal wastewater) using the demonstration facility, and to allow the City to perform maintenance on the Salinas Treatment Facility. The new physical facilities proposed to be constructed to divert this source water are described below.

Agricultural wash water influent to the Salinas Treatment Facility totaled 3,228 AF in 2013, and is projected to total 3,733 AF in 2017. The feasibility analysis for the GWR Project did not assume any continued increases in this source beyond 2017, although development of new or expanded facilities may continue to occur based on demand from future development within the Salinas Agricultural Industrial Center Specific Plan area, which would contribute additional wastewater flows to the facility.
Agricultural wash water would be available year-round, with peak flows occurring during the summer harvest season. To maximize the use of all available sources, agricultural wash water would only be diverted directly to the regional treatment plant during the peak irrigation demand months (typically April through October). From November through March, agricultural wash water flows would be sent to the Salinas Treatment Facility for treatment and stored in the existing ponds, which can hold approximately 1,250 acre-feet. From May to October, the incoming flows would be diverted to the Salinas Pump Station, and stored water would be pumped from the Salinas Treatment Facility ponds back to the Salinas Pump Station. Taking into consideration evaporative losses, seepage losses and recovery of stored water, the Salinas Treatment Facility ponds would be empty by the end of each irrigation season. The net yield after accounting for storage losses would be approximately 2,710 AFY.

The following section describes the facility modifications that would be needed to achieve this yield.

**Salinas Pump Station Diversion Structure and Pipelines.** Two of the proposed sources of raw water for the GWR Project – agricultural wash water and Salinas urban runoff – would be captured and diverted from subsurface conveyance structures to the existing Monterey One Water Salinas Pump Station. Both of these sources would necessitate construction of new diversion structures and short pipelines near the existing Salinas Pump Station. The Salinas Pump Station Diversion site (also referred to as Treatment Plant 1, or TP1) would include several new diversion facilities to redirect flows of agricultural wash water and stormwater and dry weather runoff from within the City to the existing Salinas Pump Station for blending with Salinas's municipal wastewater and then treatment and recycling at the regional treatment plant. The combined storm and waste waters would be conveyed from the existing Salinas Pump Station through Monterey One Water's existing 36-inch diameter interceptor to the regional treatment plant. The diversion facility would also accommodate the routing of agricultural wash water and winter stormwater to the Salinas Treatment Facility for seasonal storage, and would provide a termination point for the pipeline that would carry returned flows of stored waters to the Salinas Pump Station. Generally, these facilities include the following, all of which have recently been completed:

- A new underground junction structure to be constructed over the existing 48-inch sanitary sewer line, to mix sanitary, agricultural wash water and stormwater flows. This structure would also receive agricultural wash water and stormwater return flow from the Salinas Treatment Facility’s Pond 3.

- Modifications to the existing agricultural wash water underground diversion structure, and addition of approximately 150-foot long 42-inch diameter underground pipeline and metering structure between this structure and the new junction structure to be constructed over the existing 48-inch sanitary sewer line.
- An underground stormwater diversion structure (Stormwater Diversion Structure No. 1) and underground pipeline between this new structure and the existing 33-inch agricultural wash water line.

- An underground stormwater diversion structure (Stormwater Diversion Structure No. 2) near the existing stormwater pump station and underground pipeline to divert stormwater flow to the Salinas Pump Station through an existing 30-inch abandoned pipeline.

- Meters, valves, electrical and control systems, and fencing around the diversion structures.

**Salinas Treatment Facility Pond Storage and Recovery.** The City is constructing a new 42-inch industrial wastewater pipeline to replace the existing 33-inch gravity main between the City’s TP1 site (the site on which the Salinas Pump Station is located) and the Salinas Treatment Facility. Winter flows of agricultural wash water and City urban stormwater runoff would be conveyed to the ponds using the new 42-inch pipeline. Water within the Salinas Treatment Facility currently moves as gravity overflows from the aeration basin to Pond 1, then Pond 2 and finally, Pond 3. As of October 2014, the City’s planned new 42-inch industrial wastewater pipeline is under construction. In addition, a separately proposed sanitary sewer overflow structure and pipeline is planned to be built independent from the GWR Project and will have its own CEQA analysis.

Seasonal storage of agricultural wash water and City urban stormwater runoff at the Salinas Treatment Facility ponds would require construction of a new return pipeline and pump station to return the stored water to the Salinas Pump Station Diversion site. The proposed return pipeline would be an 18-inch pipeline, installed inside the existing, soon to be abandoned 33-inch pipeline. A new return pump station and a new valve and meter vault would be located within the existing Salinas Treatment Facility site near the existing pump station. The new return pump station would include two variable frequency drive pumps, a primary and a secondary. A new pipeline would be constructed from the lower end of Pond 3 to the new return pump station. A second new pump station near the lower end of Pond 3 would be needed to lift stored agricultural wash water and stormwater into a pipeline returning to the return pump station. A new short pipeline would also be constructed to convey the treated wastewater from the aeration basin to the pipeline that returns water from Pond 3 or directly to the return pump station.

**Salinas Pump Station Diversion Site Construction.** Construction activities at this site would include demolition, excavation, site grading and installation of new junction structures, new meter vault or flow measurement structures and short pipeline segments. Existing pump stations operations would be ongoing during construction due to the uninterruptible nature of conveyance of wastewater (and in some cases, stormwater flows). For this reason, temporary shunts of various waters may be necessary to maintain the collection and conveyance of waters to treatment facilities. Construction may occur up to 24 hours per day, 7 days per week due to
the necessity of managing wastewater flows; however, major construction of new facilities would be limited to daytime hours. Approximately 0.75 acres would be temporarily disturbed and up to 0.25 acres of new impervious surfaces would be added to the site. The permanent facilities would be subsurface. The site would be under construction for up to five months. Potential environmental impacts of these construction activities were considered by the GWR Project FEIR (Denise Duffy & Associates, 2015).

**Salinas Treatment Facility Storage and Recovery.** The majority of the construction activity for the Salinas Treatment Facility Storage and Recovery Facilities would occur within the existing 281-acre Salinas Treatment Facility site. New pipelines from Pond 3 and the aeration basin to the return pump station, including precast concrete manholes, would be constructed within the existing unpaved access road and parallel to the existing pipelines. A new lift station would be constructed at Pond 3 to return water to the return pump station. This new lift station would be constructed adjacent to the existing City of Salinas irrigation transfer station in Pond 3. If the work for the new lift station in Pond 3 must be performed while it is full, sheet piling and dewatering equipment will be required. The return pump station would be located near the existing influent pump station at the east end of the site.

Return pump station and pipelines construction would include trenching and installation of new pipelines, new pump and lift station, new pumps/pump motors, electrical facilities, valve vaults and flow meter, requiring equipment delivery trucks, loaders, compactors, and backhoes.

The recovery or return pipeline from the Salinas Treatment Facility to the Salinas Pump Station Diversion site would be constructed inside the existing 33-inch influent pipeline, which is scheduled to be abandoned in place after a new 42-inch pipeline is completed. Installing a new pipeline inside the existing pipeline would require excavating access pits every 600 to 800 feet along the existing alignment, cutting into the existing pipe, pulling the new assembled pipe into the existing pipe and connecting the new pipe segments before closing the pit. The work area at each pit would be up to 20 feet wide, approximately 60 feet long and up to 10 feet deep. Equipment would include equipment delivery trucks, loaders, backhoes, pipe cutting and welding equipment, pipeline fusing equipment (if fusible pipe is used), and pipeline pulling equipment. If work must occur in an existing street, paving equipment would be required for repairing the site. Potential environmental impacts of these construction activities were considered by the GWR Project FEIR (Denise Duffy & Associates 2015).

**Regulatory Setting**

**Federal**

**Clean Water Act.** The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States (waters of the U.S.) and regulating
quality standards for surface waters. Its goals are to restore and maintain the chemical, physical, and biological integrity of the nation’s waters. Under the CWA, the U.S. Environmental Protection Agency (EPA) has implemented pollution control programs and established water quality standards. The National Pollutant Discharge Elimination System (NPDES) permit program under section 402 of the CWA and enabling regulations controls water pollution by regulating point sources that discharge pollutants into waters of the United States. The EPA has delegated authority of issuing NPDES permits in California to the State Water Resources Control Board (State Board), which has nine Regional Water Quality Control Boards (RWQCBs). The Central Coast RWQCB regulates water quality in the project area. The NPDES permit program is further described below.

The U.S. Army Corps of Engineers (USACOE) and EPA regulate discharge of dredged and fill material into waters of the U.S. under Section 404 of the CWA and its implementing regulations. Waters of the U.S. are defined broadly as waters susceptible to use in commerce (including waters subject to tides, interstate waters, and interstate wetlands) and other waters (such as interstate lakes, rivers, streams, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds) (33 CFR 328.3, 40 CFR 230.3(s)(1), 40 CFR 122.2).

Section 401 of the CWA requires that, prior to the issuance of a federal license or permit for an activity or activities that may result in a discharge of pollutants into navigable waters, the permit applicant must first obtain a certification from the state in which the discharge would originate. A state certification indicates that the proposed activity or activities would not result in a violation of applicable water quality standards established by federal or state law, or that no water quality standards apply to the proposed activity.

Water bodies that may not be covered under USACOE jurisdiction may require a Section 401 Water Quality Certification for impact on waters of the state. Placement of structures, fill, or dredged materials into waters of the State requires Section 401 Water Quality Certification. Activities that require a federal Section 404 permit also require a Section 401 Water Quality Certification. The RWQCBs issue Section 401 Water Quality Certifications and waivers.

Under the authority of CWA Section 303(d), the RWQCB and State Board list water bodies as impaired when not in compliance with designated water quality objectives and standards. Section 303(d) also requires preparation of a Total Maximum Daily Load (TMDL) program for waters identified by the state as impaired. A TMDL is a quantitative assessment of a problem that affects water quality. The problem can include the presence of a pollutant, such as a heavy metal or a pesticide, or a change in a physical property of the water, such as reductions in dissolved oxygen or increases in temperature. A TMDL is established at the level necessary to implement the applicable water quality standards. A TMDL requires that all sources of pollution and all aspects of a watershed's drainage system be reviewed (both point and non-point sources).
and establishes load allocations to sources to achieve water quality standards. The CWA does not expressly require implementation of TMDLs. However, the State Board has interpreted the Porter-Cologne Water Quality Control Act (California Water Code Section 13000 et. seq.) to require that implementation be addressed when TMDLs are incorporated into Basin Plans. The EPA has established regulations (40 CFR 122) requiring that NPDES permits be revised to be consistent with any approved TMDL.

The Central Coast RWQCB lists numerous water bodies within the lower Salinas River Watershed as impaired. TMDLs have been adopted on the lower Salinas River Watershed for the pesticides chlorpyrifos and diazinon2, as well as for fecal coliform, and nitrogen compounds and orthophosphate. TMDLs are currently under development for salts and sediment toxicity (Denise Duffy & Associates 2015).

**NPDES Waste Discharge Program.** In California, the NPDES program is administered by the State Board through the RWQCBs and requires point sources to obtain NPDES permits (also called Waste Discharge Requirements in California). Point sources include municipal and industrial wastewater facilities and stormwater. There are two types of NPDES permits: individual permits tailored to an individual facility; and general permits that cover multiple facilities within a specific category. Effluent limitations serve as the primary mechanism in NPDES permits for controlling discharges of pollutants to receiving waters. When developing effluent limitations for an NPDES permit, a permit writer must consider limits based on both the technology available to control the pollutants (i.e., technology-based effluent limits) and limits that are protective of the water quality standards of the receiving water (i.e., water quality-based effluent limits if technology-based limits are not sufficient to protect the water body). For inland surface waters and enclosed bays and estuaries, the water-quality-based effluent limitations are based on criteria in the National Toxics Rule and the California Toxics Rule, and objectives and beneficial uses in the Basin Plan. For ocean discharges, the Ocean Plan contains beneficial uses, water quality objectives, and effluent limitations.

**Ocean Plan.** The Water Quality Control Plan for Ocean Waters of California (Ocean Plan), adopted by the State Board in 2012, establishes water quality objectives and beneficial uses for waters of the Pacific Ocean adjacent to the California coast outside of estuaries, coastal lagoons, and enclosed bays. The Ocean Plan objectives for ocean discharges were adopted to preserve the quality of ocean water for beneficial uses, including the protection of both human and aquatic ecosystem health. The plan establishes effluent quality requirements and management principles for specific waste discharges. The water quality requirements and objectives are incorporated into all NPDES permits.

The Ocean Plan establishes objectives for many bacterial, physical, chemical, biological, and radioactive parameters. For typical wastewater discharges, when released from an outfall, the
wastewater and ocean water undergo rapid mixing due to the momentum and buoyancy of the discharge. The mixing occurring in the rising plume is affected by the buoyancy and momentum of the discharge, a process referred to as initial dilution. The Ocean Plan objectives are to be met after the initial dilution of the discharge into the ocean. The current Monterey One Water wastewater discharge is governed by NPDES permit R3-2014-0013 issued by the Central Coast RWQCB based on Ocean Plan objectives.

**State**

**Water Quality Control Plan for the Central Coastal Basin.** The Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne) is California’s statutory authority for the protection of water quality. The Act applies to surface waters, wetlands, and groundwater, and to both point and nonpoint sources. Under Porter-Cologne, the State Board has the ultimate authority over state water rights and water quality policy. The State Board implements the provisions of the Code of Federal Regulations Part 403 pertaining to wastewater discharges, and California Code of Regulations, Title 23, Chapter 15 with regard to land disposal of wastewater. However, Porter-Cologne also establishes nine RWQCBs to oversee water quality on a day-to-day basis at the local/regional level. Monterey County is located within Region 3 – Central Coast RWQCB.

**Local Plans and Regulations**

**Salinas Treatment Facility.** The City of Salinas operates the Salinas Treatment Facility under Waste Discharge Requirement Order R3-2003-0008, issued in 2002 by the Central Coast RWQCB. The treatment facility is designed and permitted for an average daily flow of 4.0 MGD with a peak flow of 6.8 MGD. The system operates year-round and treats varying quantities of flow depending on how much agricultural wash water is shunted to the regional treatment plant.

**Regional Treatment Plant.** The NPDES permit for the Monterey One Water Regional Treatment Plant (R3-2014-0013) regulates the treated wastewater discharge from the regional treatment plant that flows into Monterey Bay through the Monterey One Water outfall. The permit allows for a discharge up to 81.2 MGD, and specified influent flows to the secondary treatment system (29.6 MGD average dry weather flow and 75.6 MGD peak wet weather flow). In most winter months, secondary treated wastewater from the regional treatment plant is discharged to Monterey Bay through the Monterey One Water ocean outfall, which includes a diffuser that extends 11,260 feet offshore at a depth of approximately 100 feet. In summer months, treated wastewater is diverted to the Salinas Valley Reclamation Plant to produce tertiary-treated recycled water for irrigation of 12,000 acres of farmland in the Castroville Seawater Intrusion Project area.
The minimum dilution requirement for the Monterey One Water effluent discharge at the outfall is 145:1 (parts seawater to effluent), which is used by the Central Coast RWQCB to determine the need for water quality-based effluent limitations and, if needed, to calculate those limitations based on water quality objectives contained in the Ocean Plan. The NPDES permit also includes effluent limitations in the Ocean Plan and a monitoring and reporting program for influent to and effluent from the regional treatment plant.

**City of Salinas General Plan.** The General Plan contains policies and implementation actions which address wastewater issues consistent with regulatory requirements, and whose implementation may serve as mitigation for significant impacts. These include the following:

**Policy PSU2.** The City will implement Implementation Program LU-16, which requires the City to continue to work with the Monterey One Water plan for and ensure adequate capacity for sewage treatment facilities.

**Policy PSU3.** The City will implement Implementation Program LU-14, which requires the City to review development proposals and require necessary studies, as appropriate, and water conservation and mitigation measures to ensure adequate water and sewer service.

**Policy PSU4.** The City will implement Implementation Program LU-15, which requires the City to continue to implement and update the Sewer and Drainage Master Plan as necessary. In addition, as part of the Master Plan update, the City will analyze the need for additional pump station capacity and identify methods to reduce the wet weather flows.

**City of Salinas Municipal Code.** The Municipal Code contains regulations that address industrial wastewater and municipal wastewater collection and discharge. Chapter 36 contains measures regarding the use of sanitary sewers in the City (Article II) and industrial waste water (Article III). Each article includes specific requirements regarding wastewater.

**Proposed EDE Policies**

The EDE contains policies and implementation actions which address wastewater issues. These include the following:

**Action I-3.1.3.** For priority economic areas located outside the City’s Sphere of Influence, in coordination with LAFCO, prepare a Municipal Services Plan to identify the capacity and cost of City services to meet demand from new development. Prepare a plan for services for
addressing service gaps and funding new service requirements. Prepare a fiscal impact study to determine the net cost/revenue to the City from the new developments.

**Policy ED-I-3.2.** Redesign existing wastewater and storm drainage infrastructure systems, including broad municipal level wastewater and storm water solution for water reuse, and ensure that outdated infrastructure is upgraded to accommodate existing and future businesses.

**Action I-3.2.3.** Design, fund and construct improvements to the Industrial Waste Water Treatment Facility to convert the wastewater into potable water or aquifer recharge water for sale or reuse.

**Action I-3.2.4.** Plan, design, fund, and construct improvements to the City’s storm water system to allow direct flow to the Industrial Waste Water Treatment Facility for capture and reuse.

**Action I-3.2.5.** Replace and maintain the Industrial Wastewater Treatment Facility pipelines, as needed, serving the agricultural/industrial processing businesses within the community.

**Policy ED-I-3.5.** Pursue public-private partnerships to increase access to and potentially fund energy, water, resource recycling and reuse, dark fiber communications, and other infrastructure capacity.

**Action I-3.5.2.** Allocate resources to implement the City’s Memorandum of Understanding with DeepWater Desal to bring additional sources of water, energy, and dark fiber communications connectivity to the City.

**Policy ED-I-3.6.** Work with local and regional agencies to identify new and expanded infrastructure requirements and costs to ensure adequate service capacity to meet the demands of new development in the Economic Opportunity Areas located outside the existing city limits, but within the Sphere of Influence.

**Action EGB-2.3.3.** Support development of seawater desalination facilities, expanded groundwater recharge, and capture and reuse of storm water and agricultural wash water in Monterey County, if cost effective and feasible, to obtain new water supplies for Salinas.
Standards of Significance

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subjects of utilities and service systems, including wastewater systems, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on these subjects, or indeed on any subject addressed in the checklist. (Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or

- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project’s projected demand.

The Appendix G questions on the subjects of wastewater also give rise to an additional threshold that is not relevant to the proposed project. Under this threshold, significant impacts would result if a proposed project would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;

Development within Target Areas will result in new industrial, retail, and business park development which will require additional sewer service. Wastewater from retail and business park sources would be directed to the regional treatment plant. Future wastewater flows from industrial sources would either be directed to the Salinas Treatment Plant for treatment and discharge; directed to the Salinas Treatment Plant for treatment and temporary storage before being conveyed to the regional treatment plant as a feature of the GWR Project; or directly conveyed to the regional treatment plant through the Salinas Pump Station as a feature of the GWR Project.

As identified in the Regulatory Setting of this section, both treatment plants operate under waste discharge permits administered by the Central Coast RWCQB. It is the responsibility of each treatment plant to remain in compliance with RWCQB discharge requirements. Therefore, there is no further discussion of this threshold in this section.
**Analysis, Impacts, and Mitigation**

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.0, Project Description. Individual future projects proposed within the Target would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

**IMPACT: INCREASE IN WASTEWATER TREATMENT DEMAND FROM TARGET AREA BUILDOUT (LESS THAN SIGNIFICANT)**

Development within the Target Areas will result in new industrial, retail, and business park development which will produce wastewater that requires treatment. Municipal wastewater from retail and business park sources within Target Areas N, L2, K, F, and V would be collected by the City and directed to the regional treatment plant through the Salinas Pump Station. Industrial wastewater from development within Target Area B would either, i) be directed to the Salinas Treatment Facility for treatment and temporary storage before being conveyed to the regional treatment plant as a feature of the GWR Project, or ii) be directly conveyed to the regional treatment plant through the Salinas Pump Station as a feature of the GWR Project.

Table 43, Target Area Wastewater Generation, displays projected building capacity within the Target Areas by land use type and the associated wastewater generation volumes that would result from such development. Flow volume is calculated because it provides an indication of new flow that would require treatment at the regional treatment plant and which has not previously been identified by Monterey One Water in its future treatment demand projections.

**Table 43 Target Area Wastewater Generation**

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Land Demand (gross acres)</th>
<th>Wastewater Flow Generation Factor (gpd/acre)¹</th>
<th>Wastewater Flow Generation (MGD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial</td>
<td>147</td>
<td>2,000</td>
<td>0.29</td>
</tr>
<tr>
<td>Retail</td>
<td>164</td>
<td>1,200</td>
<td>0.20</td>
</tr>
<tr>
<td>Business Park</td>
<td>132</td>
<td>1,200</td>
<td>0.16</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>442</strong></td>
<td>-</td>
<td><strong>0.65</strong></td>
</tr>
</tbody>
</table>

*Source:* EMC Planning Group 2016

*Note:* ¹Land Use Generation Flow Factors from City of Salinas Sanitary Sewer Plan, 2014
If increased wastewater flows from development of the Target Areas would result in a determination by Monterey One Water that it has inadequate capacity in the Salinas Pump Station and/or regional treatment plant, or by the City regarding capacity within the Salinas Treatment Facility, environmental impacts may occur with the construction of new plants or the expansion of existing plants. Any such need for new capacity is unlikely to arise, however.

The GWR Project includes expanded capacity improvements at both the Salinas Pump Station and Salinas Treatment Facility to accommodate future source flows from these facilities to the regional treatment plant. The GWR Project FEIR considered potential environmental impacts from construction activities associated with improvements at the Salinas Pump Station and Salinas Treatment Facility. The addition of increased wastewater flows from development within the Target Areas would represent a relatively minor addition and would not result in either facility exceeding its capacity (Telephone conversation with Gary Petersen, July 27, 2016).

Additionally, construction and potential impacts of GWR Facilities at the regional treatment plant were previously considered by the GWR Project FEIR. The addition of increased wastewater flows from development within the Target Areas would be accommodated by GWR facilities at the regional treatment plant. Flows to the regional treatment plant are down compared to historic flows based on increased conservation efforts, even with recent growth in Salinas; and increased flows from Salinas would be beneficial to operations at the regional treatment plant (Personal communication with Bob Holden, July 29, 2016). Consequently, the estimated 0.59 MGD of wastewater from Target Area buildout uses could be accommodated by the regional treatment plant based on current use and future capacity projections. Adding wastewater flows from the proposed project would not result in the need to construct new wastewater treatment facilities, the construction of which may have adverse environmental impacts. No mitigation is required.

### 3.14 Water Supply

Future development within the Target Areas will increase demand for water supply. Water is supplied to urban uses in the city by two different water purveyors. This section of the EIR includes discussion of the existing water supply setting with a focus on groundwater resource conditions, analysis of water demand from existing agricultural lands that would be converted to urban use with implementation of the proposed project, a projection of water demand from future development within the Target Areas, and assessment of the effects of that demand on groundwater resource conditions.

Information in this section is derived primarily from:
LandWatch Monterey County responded to the NOP with a recommendation that the cumulative impacts of the project on water supply should be evaluated without assuming that conversion of agricultural land to urban uses would result in reduced water demand. LandWatch suggests that such conversion may displace agricultural activity to margins of the Salinas Valley that were previously in open space, with the result that agricultural water demand does not actually decline as a result of land conversion at the margins of the City.

Environmental Setting

Water Supply Purveyor for Target Areas

Urban water supply is provided to users in Salinas by two water purveyors, California Water Service Company (Cal Water) and the Alco Water Company. Target Areas K and V are within Cal Water’s existing district boundary. Target Areas B, F, N, and L1/L2 are outside of, but contiguous with, Cal Water’s district boundary. None of the Target Areas are within Alco’s existing service boundary or contiguous to it. Therefore, it is assumed that Cal Water would provide water service to all of the Target Areas. At the request of the City and/or individual project developers, Cal Water would apply to the California Public Utilities Commission for approval to expand its service district boundary in the future to include the Target Areas currently located outside of the boundary. The boundary change would not likely be considered unless the City first acts to amend its sphere of influence to include the subject Target Areas.

Cal Water has a total of 28 wells that supply the Salinas service area. The design production capacity of active operational wells is 27,880 gallons per minute (gpm), which is equivalent to 40 million gallons per day (MGD) or 44,843 acre-feet per year (AFY). Cal Water has three new wells being constructed and scheduled to become operational in 2017 and 2018. Well capacities range from 500 gallons per minute (gpm) to 2,000 gpm. It is assumed that the three new wells will have an average design capacity of 1,200 gpm for a total of 3,600 gpm or 5.18 MGD, which is equivalent to 5,812 AFY. Three additional wells are planned within the boundary of the West Area Specific Plan, a project currently being considered by the City that is located in the north of Boronda Road Future Growth Area. The design capacity for each of these three wells would be 1,200 gpm each. The first of these is scheduled to come online in 2020 (Cal Water 2015).

As described in the Regulatory Setting section below, Cal Water was consulted about the proposed project pursuant to requirements contained in California Government Code section
In response, Cal Water provided its most recent adopted urban water management plan, the 2015 Urban Water Management Plan, Salinas District, which was adopted by Cal Water in April 2016. Cal Water also provided supplemental information about groundwater supply, its service capabilities, and water demand factors for non-residential land use types. This latter information was used to project future water demand from buildout of the Target Areas as described in the Analysis, Impacts, and Mitigation section below.

Recent and Existing Weather Conditions

According to the California Department of Water Resources, California in late 2016 and early 2017 experienced record wet conditions following five consecutive years of drought. In 2015, the state had record low statewide mountain snowpack of only five percent of average. The three driest consecutive years of statewide precipitation in the historical record were in 2012-14. Water year 2017 (October 1, 2016-September 30, 2017) has surpassed the wettest year of record (1982-83) in the Sacramento River and San Joaquin River watersheds and is close to becoming the wettest year in the Tulare Basin (set in 1968-69). Mountain snowpack is already well above the April 1 seasonal averages throughout the Sierra Nevada, with the southern Sierra being more than 200 percent of average for the year to date.

California experiences the most extreme variability in yearly precipitation in the nation. The summary on California Precipitation by the Center for Western Weather and Water Extremes at the Scripps Institution explains how large storms (often atmospheric river storms) contribute to those extreme changes. Water year 2017 has been an active year for atmospheric river storms.

The potential for wide swings in precipitation from one year to the next shows why the state must be prepared for either flood or drought in any year. Although this year may be wet, dry conditions could return again next year. 2017 may be only a wet outlier in an otherwise dry extended period. Unfortunately, the scientific ability to determine if next year will be wet or dry (known as sub-seasonal to seasonal forecasting, or long-range weather forecasting) does not exist, as forecasters are not yet capable of delivering reliable predictions from year to year (California Department of Water Resources 2017).

Groundwater Supply, Demand, and Basin Overdraft

There is no available data regarding how the 2016-2017 storms have affected the Salinas Valley Groundwater Basin (groundwater basin). The following discussion is based upon reports prepared prior to the recent storms.

Groundwater is currently the dominant source of water supply for agricultural and municipal water demands in the Salinas Valley. Agricultural water use represents approximately 90 percent of all water used in the Salinas Valley. Unlike the trend in reduced agricultural pumping, urban water use has been increasing. Increases in urban water use, particularly on non-irrigated lands
in the northern portion of the Salinas Valley, will place additional pressure on groundwater pumping (Brown & Caldwell 2016, pp. 2-4 – 2-5). The Target Areas are located on irrigated agricultural land. Hence, water demand from their development with urban uses will replace water demand for irrigation.

Urban water supply to Salinas is currently derived exclusively from groundwater. There are no sources of imported water available to augment groundwater supplies within the district or within the groundwater basin. For this reason, the condition of groundwater resources from a supply and demand perspective is critically important in considering potential effects of increased water demand that would result from development of the Target Areas. Due to the growth of urban development and agricultural activities over time, demand for groundwater has increased, resulting in impacts on groundwater availability and quality.

Salinas is situated at the northern end of the Salinas Valley, a relatively narrow, elongated, fault down-dropped, sedimentary basin in the California Central Coast Range. The uplifted mountainous boundary consists of older granitic, metamorphic and marine sedimentary rocks of the Salinian tectonic block. Beneath the valley, a thick sequence of Tertiary marine sedimentary rocks is overlain by late Tertiary to Recent non-marine sedimentary deposits of fluvial and alluvial fan origin. The uppermost 1,000 feet, or more, of this non-marine sequence contains the fresh ground-water basin that is utilized for various water supply purposes.

Cal Water extracts groundwater from two hydraulically connected subbasins of the groundwater basin known as the Pressure Subarea and the East Side Subarea. Much of the water supply for Salinas is extracted from the Pressure Subarea. The Pressure Area is a region of gradually declining groundwater elevations and is characterized by three confined aquifer systems, overlain and separated by thick clay layers that act as aquicludes. These aquifers are named for their relative depths, and are known as the “180-foot”, the “400-foot”, and “900-foot” aquifers, respectively. The groundwater level in the East Side Area is declining more rapidly than any other area in the groundwater basin. The East Side Area is comprised of unconfined, randomly scattered water bearing strata (Yarne & Associates 2016).

As described in Cal Water’s 2015 UWMP, the groundwater basin was in an overdraft condition at the time the UWMP was adopted. The state has designated the 180-foot and 400-foot aquifers as critically overdrafted. While the basin remains unadjudicated, the California Department of Water Resources has listed the groundwater basin as a high priority. The main concern of the overdraft is not water level, but rather seawater intrusion into these two aquifers. Seawater intrusion threatens the quality of water extracted from the aquifers.

The UWMP notes the annual non-drought overdraft of the groundwater basin is approximately 45,300 AFY. Because of the hydrologic continuity between the ocean and the aquifers of the
Pressure Area, seawater has been intruding into these aquifers at a rate of approximately 28,800 AFY. During droughts, the annual overdraft can escalate to between 150,000 and 300,000 AFY per year.

Refined data on the imbalance of the groundwater basin can be found in the Brown & Caldwell’s 2016 State of the Salinas River Groundwater Basin. That report investigates conditions in “Zone 2C” of the groundwater basin. Zone 2C is comprised of seven of the subbasins within the groundwater basin. The report further focuses on the four water-producing subareas, including the Pressure Subarea and the East Side Subarea, that produce nearly all of the reported groundwater use within Zone 2C. The report states that the basin appears to be out of hydrologic balance. The average annual groundwater extraction for the four noted subareas that compose Zone 2C was about 523,000 AFY from 1959 to 2013. The average annual change in storage was about 17,000 to 24,000 AFY, including seawater intrusion. Based on the continued large storage declines in the East Side and Pressure Subareas (and resulting groundwater declines and seawater intrusion), the current distribution of groundwater extractions is not sustainable. Seawater intrusion can account for up to 18,000 AFY of the total storage loss of 24,000 AFY. It is stated that sustainable use of groundwater can only be achieved by aggressive and cooperative water resources planning to mitigate seawater intrusion and groundwater head declines (Brown & Caldwell 2015, p. ES-16). Brown & Caldwell note three possible options for reducing seawater intrusion impacts. These include: 1) reducing pumping in the Pressure and East Side subareas; 2) shifting pumping to areas farther away from the coast as long as it is shifted to areas far enough inland; and 3) shifting pumping from the 180-foot and 400-foot aquifers to the deep 900-foot aquifer. Regarding the latter, it is uncertain whether this is a viable option given lack of information about connectivity between the three aquifers and whether pumping in the 900-foot aquifer would lead to the onset of regional seawater intrusion (Brown & Caldwell 2015, pp. 6-3 – 6-4).

Figure 21, 180-Foot Aquifer Seawater Intrusion Map and Figure 22, 400-Foot Aquifer Seawater Intrusion Map, illustrate the historic progression of seawater intrusion into the respective aquifers. Intruding seawater has advanced into the 180-foot aquifer to within one mile of Cal Water’s closest well. Cal Water has shifted production as much as possible out of the 180-foot and East Side aquifers and located it further south and more in the 400-foot aquifer of the Pressure area. Cal Water does not pump from the 900-foot aquifer. No change was observed in the location of the intrusion contours between the years 2011 and 2013, the most recent year for which analysis is available. It is possible that the first two years of the current drought did not have an apparent effect on the movement of the seawater intrusion front (Brown & Caldwell 2015, p. ES-13).
Figure 21

180-Foot Aquifer Seawater Intrusion Map

Salinas Economic Development Element Program EIR

Note: The scale and configuration of all information shown herein are approximate and are not intended as a guide for survey or design work. Contour lines are drawn from best available data.

Source: MCWRA 2014
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**Seawater Intruded Areas By Year**

Note: The scale and configuration of all information shown hereon are approximate and are not intended as a guide for survey or design work. Contour lines are drawn from best available data.

Source: MCWRA 2014

Figure 22

400-Foot Aquifer Seawater Intrusion Map

Salinas Economic Development Element Program EIR
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Current/Planned Water Projects to Reduce Groundwater Overdraft

Seawater intrusion into the Salinas Valley Groundwater Basin has been a problem for many years. A solution was identified as early as 1946 when the State of California proposed a three-part remedy:

- Construct several large reservoirs to capture excess storm flow on the upper reaches of the Salinas River and its tributaries;
- Recharge groundwater in the upper valley and Forebay sub-areas of the Salinas Valley with the captured runoff; and
- Extract portions of the augmented groundwater and transmit it via a conveyance system to the East Side and Pressure sub-areas of the basin so that the water users in this northern-most region of the valley can reduce their use of groundwater.

The first two parts of this solution have been constructed and are in operation. Nacimiento and San Antonio reservoirs were built and are operated by the Monterey County Water Resources Agency (MCWRA). The water that they capture is released in a controlled manner to recharge the aquifers in the upper and Forebay areas through the natural riverbeds. The final part of the solution as described above the extraction of portions of the augmented groundwater and transmit it via a conveyance system to the East Side and Pressure sub-areas of the basin, has not been implemented (Cal Water 2016).

There are however, a number of additional projects that have been implemented, are currently being implemented, or are planned to reduce overdraft and reduce/halt seawater intrusion within the groundwater basin. Several of these are summarized below.

Castroville Seawater Intrusion Project. The Castroville Seawater Intrusion Project was completed in 1998. It generates recycled water for use by agricultural water users in the Castroville area during the irrigation season. By providing recycled water for agricultural use, the need for groundwater pumping to meet agricultural demand is significantly reduced. This in turn results in reduced intensity and rate of seawater intrusion.

Salinas Valley Water Project. The MRWPCA has utilized a collaborative effort with Salinas Valley interests to develop the Salinas Valley Water Project to address water resources management issues within the Salinas Valley. The project was approved in 2003. The Salinas Valley Water Project provides for the long-term management and protection of groundwater resources in the basin by attempting to meet the following objectives: stopping seawater intrusion and providing adequate water supplies and flexibility to meet current and future (year 2030) needs. In addition, the project provides the surface water supply necessary to attain a hydrologically balanced groundwater basin in the Salinas Valley. The Salinas Valley Water
Project includes Nacimiento Dam spillway modification and a rubber dam on the Salinas River near Marina, to allow diversion of river water for treatment and piping to nearby farms for irrigation. The project is also intended improve flood control and Nacimiento Dam safety, recharge the aquifers and improve river flow for migration of the federally designated threatened Steelhead trout. Construction of the Nacimiento spillway modifications was completed in 2009 and Salinas River diversion facility began its operation in April 2010 (http://www.mcwra.co.monterey.ca.us/salinas_valley_water_project_I/salinas_valley_water_project_I.php).

**Salinas Valley Groundwater Project Phase II.** A conceptual design for Phase II of the Salinas Valley Water Project has been developed by MCWRA. Under this plan additional winter flood flows would be diverted from the Salinas River. These diversions, up to 135,000 AFY, could be directly used by urban customers. A technical memorandum was completed in 2013. Phase II incorporates two surface water diversion points and will be accompanied by conveyance and delivery facilities. The project is not yet funded, so its implementation has not begun (Phone Conversation with Howard Franklin, Monterey County Water Resources Agency, December 7, 2016). A Notice of Preparation was prepared to initiate the CEQA process approximately one year ago, but the environmental review process has not advanced since that time.

**Pure Water Monterey Project.** The approved Pure Water Monterey Groundwater Replenishment Project will serve northern Monterey County. The project will provide both purified recycled water for recharge of the Seaside Groundwater Basin that serves as drinking water supply, and recycled water to augment the existing Castroville Seawater Intrusion Project’s crop irrigation supply. The project is jointly sponsored by the MRWPCA and the Monterey Peninsula Water Management District, and also includes participation by the City of Salinas, the Marina Coast Water District, and the MCWRA. CEQA documentation has been completed for this project.

The project includes collection of a variety of new source waters and conveyance of that water to the MRWPCA’s regional wastewater treatment plant (regional plant) for treatment and recycling. New source waters include: 1) water from the City of Salinas agricultural wash water system; 2) storm water flows from the southern part of Salinas and the Lake El Estero facility in Monterey; 3) surface water and agricultural tile drain water that is captured in the Reclamation Ditch and Tembladero Slough; and 4) surface water and agricultural tile drain water that flows in the Blanco Drain. The project would enable California American Water Company to reduce its diversions from the Carmel River system by up to 3,500 acre-feet per year by injecting the same amount of purified recycled water into the Seaside Groundwater Basin. The project would also provide additional recycled water for agricultural irrigation in northern Salinas Valley through the Castroville Seawater Intrusion Project’s agricultural irrigation system. It is anticipated that in normal and wet years approximately 4,500 to 4,750 acre-feet per year of
additional recycled water supply could be created for agricultural irrigation purposes. In drought
conditions, the project could provide up to 5,900 acre feet per year for crop irrigation (Denise
Duffy & Associates 2016). It is this latter source of new agricultural water that would replace an
equivalent volume that is now pumped from the groundwater basin and contributes to
groundwater overdraft and seawater intrusion.

**Other Water Supply Projects.** Cal Water’s UWMP includes discussion of new water supply
projects from which Cal Water may be able to obtain water supply that would reduce its need to
pump groundwater from the groundwater basin. These include Monterey Peninsula Water
Supply Project (referenced in the UWMP as the former named Coastal Water Project) and the
DeepWater Desal project in Moss Landing.

The Monterey Peninsula Water Supply Project is designed to supply supplemental water to
consumers on the Monterey Peninsula. The primary purpose is to enable California American
Water, the primary water purveyor for these customers, to reduce California American Water's
diversion of water from the Carmel River as mandated by the State. Therefore, this project is not
expected to have significant potential to reduce groundwater extraction within the Salinas
Valley.

The DeepWater Desal project, proposed for a location in Moss Landing, is in the planning
stages. Environmental review is underway and expected to be completed in late 2017 or early
2018. If approved, the project is projected to be operational in 2021. If the project proceeds as
proposed, it could become a source of municipal water supply for the City of Salinas, thereby
potentially reducing the volume of groundwater extracted to serve demand in the city.

**Agricultural Land Conversion and Displacement of Agricultural Irrigation
Water Demand**

As previously noted, in its comments on the NOP, LandWatch suggested that conversion of
agricultural uses to urban uses may not result in a net reduction in water demand as is
commonly the case. LandWatch noted that “trend analysis” suggests that the acreage of
agricultural land lost to urban use is being replaced through conversion of non-agricultural land
at the margins of the Salinas Valley to agricultural use. As such, LandWatch suggests that water
demand from conversion of agricultural land to urban use would not result in a net decrease in
water demand.

LandWatch was contacted to request more information about the “trend analysis” referenced in
its comment letter. LandWatch responded with supplemental information. The information
includes a summary of agricultural land conversion trends as reported by the California
Department of Conservation’s Farmland Mapping and Monitoring Program. The data shows
that from 2010-2012, approximately 376 acres of agricultural land in Monterey County was
converted to urban use. During the same period, nearly ten times that amount of land that was previously in other uses (e.g. range land, open space, etc.) was converted to agricultural use. During the 2012-2014 period, the acreage of land converted to agricultural use declined.

The dramatic difference between agricultural land conversion from urban development and total land conversion to agricultural use suggests that a variety of factors other than urban development in Monterey County are responsible for the latter trend. LandWatch suggests the significant rate of conversion may in part be due to ready availability of free groundwater for agricultural use; rising demand for land on which to grow organic produce, thereby avoiding the requirement for a three-year transition period for converting from conventional to organic production; and/or economic benefits of converting ranch land to agricultural use. While the data provided by LandWatch is informative, it does not provide evidence for a correlation between loss of agricultural land due to urban conversion and accelerated conversion of ranchland, open space land or other land resources to agricultural use. Based on the information provided, it would be speculative to conclude that conversion of agricultural land to urban uses in the County directly results in displacement of an equivalent volume of water demand to other locations in the Salinas Valley where conversion of non-agricultural land to agricultural use has occurred.

**Regulatory Setting**

**California Government Code Section 65350/California Senate Bill 610 – Information from Water Suppliers**

The process that cities and counties must undertake when they adopt or substantially amend general plans is set forth in Article 6 (Preparation, Adoption, and Amendment of the General Plan) of Chapter 3 (Local Planning) of Division 1 (Planning and Zoning Law) of Title 7 (Planning and Land Use) of the California Government Code. Article 6 commences with section 65350. Section 65352 requires that before a legislative body of a city or county takes action to adopt or substantially amend a general plan, the city or county must first refer its proposed action to a range of entities. Section 65352(a)(7) requires that such proposed actions be referred to any public water system that serves water to customers within the area covered by the proposal. The purpose of this consultation is enumerated in Section 65352.5(a) as follows:

65352.5(a) The Legislature finds and declares that it is vital that there be close coordination and consultation between California's water supply or management agencies and California's land use approval agencies to ensure that proper water supply and management planning occurs to accommodate projects that will result in increased demands on water supplies or impact water resource management.
(b) It is, therefore, the intent of the Legislature to provide a standardized process for determining the adequacy of existing and planned future water supplies to meet existing and planned future demands on these water supplies and the impact of land use decisions on the management of California's water supply resources.

Subdivision (c) of section 65352.5 provides that the public water system is required to provide the city or county with a range of information that assists with the local planning agency's evaluation of potential impact of the proposed action on water supply resources. This information includes the current version of the public water system's urban water management plan, its capital improvement program or plan, the source or sources of the total water supply currently available, the quantity of surface water that was purveyed by the water supplier in each of the previous five years, the quantity of groundwater that was purveyed by the water supplier in each of the previous five years, a description of all proposed additional sources of water supplies, the total number of customers currently served, the expected reduction in total water demand identified by each customer category, and any additional information that is relevant to determining the adequacy of existing and planned future water supplies to meet existing and planned future demands on these water supplies. This information is intended to ultimately find its way into the conservation element of the local planning agency's general plan. (Gov. Code, § 65302, subd. (d)(1).)

Here, the City is the applicable local planning agency and Cal Water is the public water system/water purveyor as described in the above-mentioned California Government Code sections. Pursuant to the code requirements, the City referred the proposed project to Cal Water in April 2016. Cal Water subsequently supplied the information identified in Section 65352.5(c), much of which is contained in Cal Water’s 2015 UWMP. Information from the UWMP and from communications with Cal Water are referenced as part of the water supply impact analysis in the Analysis, Impacts, and Mitigation section below.

In 2014, the Legislature amended Government Code section 65352 so that it also required local planning agencies contemplating the adoption or substantial amendments to their general plans to also consult with “[a]ny groundwater sustainability agency that has adopted a groundwater sustainability plan pursuant to Part 2.74 (commencing with Section 10720) of Division 6 of the Water Code or local agency that otherwise manages groundwater pursuant to other provisions of law or a court order, judgment, or decree within the planning area of the proposed general plan.” The creation of “groundwater sustainability agencies” is mandated by the Sustainable Groundwater Management Act (SGMA), discussed below.

In 2001, due to its concern about the approval of large new developments without proof that water supply is available to serve them, the California Legislature passed Senate Bill 610 (see Wat. Code, § 10910 et seq; see also CEQA Guidelines, § 15155.) SB 610 requires that a water
supply assessment (WSA) be prepared and incorporated into the CEQA process for new development projects that meet certain size and development intensity criteria. (See Wat. Code, §§ 10910 – 10912.) A WSA must include analysis of the estimated water demands and proposed water sources for a new project. More specifically, the WSA must address whether existing supplies of domestic water available to the development are adequate to serve the project, and will continue to be adequate over the next 20 years during normal, dry, and multiple-dry years, taking into account the public water system’s existing and planned future uses, including agricultural and manufacturing uses. (Wat. Code, § 10910, subds. (c)(3), (c)(4).)

If the public water system concludes that existing supplies will be sufficient for all such demands, including the demand created by a proposed project, the public water system must demonstrate the availability of such water by providing the following as part of a WSA:

(A) Written contracts or other proof of entitlement to an identified water supply.

(B) Copies of a capital outlay program for financing the delivery of a water supply that has been adopted by the public water system.

(C) Federal, state, and local permits for construction of necessary infrastructure associated with delivering the water supply.

(D) Any necessary regulatory approvals that are required in order to be able to convey or deliver the water supply.

(Id., subd. (d)(2).)

If the WSA concludes that existing supplies will not be sufficient, the WSA must include a strategy for acquiring “additional supplies.” (Wat. Code, § 10911, subd. (a).) Under such a scenario, the WSA should include information concerning the following:

(1) The estimated total costs, and the proposed method of financing the costs, associated with acquiring the additional water supplies.

(2) All federal, state, and local permits, approvals, or entitlements that are anticipated to be required in order to acquire and develop the additional water supplies.

(3) Based on the considerations set forth in paragraphs (1) and (2), the estimated timeframes within which the public water system, or the city and county. . . expects to be able to acquire additional water supplies.

(Ibid.)

A finding of insufficiency in a WSA does not require a city or county to deny or downsize a proposed development project. In preparing the environmental document for a project requiring
a WSA, the city or county lead agency may include its own evaluation of the information contained in the WSA. (Wat. Code, § 10911, subd. (c).) At the time of project approval, the lead agency must then “determine, based on the entire record, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses.” (Ibid.) Even if, after the lead agency’s own evaluation, it determines that there are not sufficient water supplies for the project, there is nothing to prevent the agency from approving the project, so long as the agency “include[s] that determination in its findings for the project.” (Ibid.; see also CEQA Guidelines, § 15155, subd. (e).)

In 2016, the Legislature amended SB 610 to require WSAs for projects anticipating groundwater usage to address whether any groundwater sustainability agency has adopted a groundwater sustainability plan pursuant to SGMA, and to include information from any such plan. (See Wat. Code, § 10910, subd. (f)(2)(C)(2).)

Because the City of Salinas is proposing a substantial amendment of its General Plan, the City has conducted a consultation with Cal Water pursuant to California Government Code Section 65352 as a means of obtaining information from Cal Water’s Urban Water Management Plan, and was not required to ask Cal Water to also prepare a WSA. The information provided by Cal Water through the Government Code consultation process is largely the same as what the City would have obtained through a WSA.

Note that future individual projects proposed within the Target Areas may be required to prepare a WSA. This determination would be made at the time a project application is submitted. If required, a WSA must be completed prior to the City’s consideration to approve the associated project.

**Sustainable Groundwater Management Act**

On September 16, 2014, Governor Brown signed into law Assembly Bill 1739, Senate Bill 1168, and Senate Bill 1319 (AB-1739, SB-1168, and SB-1319). This three-bill legislative package is known collectively as the Sustainable Groundwater Management Act. The act was amended in the later part of 2015 by Senate Bill 13, Senate Bill 226 and Assembly Bill 1390 to provide clarity to the original law and guidance on groundwater adjudications. This new legislation defines sustainable groundwater management as the “management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results.” The legislation defines “undesirable results” to be any of the following effects caused by groundwater conditions occurring throughout the basin:

- Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply;
- Significant and unreasonable reduction of groundwater storage;
• Significant and unreasonable seawater intrusion;
• Significant and unreasonable degraded water quality;
• Significant and unreasonable land subsidence; and
• Surface water depletions that have significant and unreasonable adverse impacts on beneficial uses of the surface water.

The legislation provides for financial and enforcement tools to carry out effective local sustainable groundwater management through formation of groundwater sustainability agencies consisting of local public agencies, water companies regulated by the California Public Utilities Commission, and mutual water companies. The legislation requires that groundwater sustainability agencies within high- and medium priority basins under the California Statewide Groundwater Elevation Monitoring Program subject to critical conditions of overdraft prepare and submit groundwater sustainability plans for the basin by January 31, 2020, and requires groundwater sustainability agencies in all other groundwater basins designated as high- or medium priority basins to prepare and submit a groundwater sustainability plan by January 31, 2022. Following state approval, the basin would thereafter be managed under the groundwater sustainability plan. The legislation does not require adjudicated basins to develop groundwater sustainability plans, but they are required to report their water use.

The key intended outcomes and benefits of the Sustainable Groundwater Management Act are numerous, and include:

• Advancement in understanding and knowledge of the State’s groundwater basins and their issues and challenges;
• Establishment of effective local governance to protect and manage groundwater basins;
• Management of regional water resources for regional self-sufficiency and drought resilience;
• Sustainable management of groundwater basins through the actions of Groundwater Sustainability Agencies, utilizing State assistance and intervention only when necessary;
• All groundwater basins in California are operated to maintain adequate protection to support the beneficial uses for the resource;
• Surface water and groundwater are managed as “a Single Resource” to sustain their interconnectivity, provide dry season base flow to interconnected streams, and support and promote long-term aquatic ecosystem health and vitality;
A statewide framework for local groundwater management planning, including development of sustainable groundwater management best management practices and plans;

Development of comprehensive and uniform water budgets, groundwater models, and engineering tools for effective management of groundwater basins;

Improved coordination between land use and groundwater planning; and

Enforcement actions as needed by the SWRCB to achieve region-by-region sustainable groundwater management in accordance with the 2014 legislation.

As ultimately approved, groundwater sustainability plans must include, among other things, (i) a “general discussion of historical and projected water demands and supplies,” (ii) “[m]easurable objectives, as well as interim milestones in increments of five years, to achieve the sustainability goal in the basin within 20 years of the implementation of the plan, and (iii) a “description of how the plan helps meet each objective and how each objective is intended to achieve the sustainability goal for the basin for long-term beneficial uses of groundwater.” (Wat. Code, § 10727.2, subds. (a)(3), (b)(1), and (b)(2).)

To assist in attaining the above outcomes, the California Department of Water Resources (DWR) will provide groundwater sustainability agencies with the technical and financial assistance necessary to sustainably manage their water resources. The benefits of these outcomes include:

- A reliable, safe and sustainable water supply to protect communities, farms, and the environment, and support a stable and growing economy; and

- Elimination of long-term groundwater overdraft, an increase in groundwater storage, avoidance or minimization of subsidence, enhancement of water flows in stream systems, and prevention of future groundwater quality degradation.

In short, SGMA is landmark legislation that, for the first time in the history of California, requires comprehensive groundwater management, with the mandatory goal of bringing all currently overdrafted basins into sustainable conditions by no later than 2040 or 2042, with five-year increments of progress starting in 2025 and 2027.

As part of its responsibilities to implement the act, DWR has defined the 180-foot, the 400-foot, and the Paso Robles aquifers within the groundwater basin as high priority basins. Groundwater sustainability plans must be implemented for these aquifers by 2020. The other aquifers within the groundwater basin must have adopted plans by 2022 (Cal Water 2016).
A process is underway in Monterey County to implement the SGMA. A Salinas Valley Basin Groundwater Sustainability Agency has been formed. A Board of Directors has established, as has an advisory committee. The goal is to form the agency by mid-2017 and develop a groundwater sustainability plan consistent with the act’s requirements (http://www.svbgsa.com).

**California Green Building Standards Code**

The Green Building Standards Code (CALGreen), which requires all new buildings in the state to be more energy efficient and environmentally responsible, took effect on January 1, 2011. These comprehensive regulations will achieve major reductions in greenhouse gas emissions, energy consumption, and water use. Water use reductions are specified based on performance standards contained in the code that target indoor plumbing fixtures such as toilets, showerheads, faucets, etc., as well as outdoor water use through installation of irrigation controllers.

**Local Plans and Regulations**

**California Water Service Urban Water Management Plan.** California’s Urban Water Management Plan Act requires urban water suppliers to prepare an UWMP every five years and to file this plan with the DWR, the California State Library, and any city or county within which the supplier provides water supplies. All urban water suppliers, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet annually, are required to prepare an UWMP.

The UWMP is a foundational document and source of information about the Cal Water Salinas District’s historical and projected water demands, water supplies, supply reliability and vulnerabilities, water shortage contingency planning, and demand management programs, including water conservation planning. Among other things, it is used as:

- A long-range planning document by Cal Water for water supply and system planning; and
- Source data on population, housing, water demands, water supplies, and capital improvement projects used in regional water resource management plans prepared by wholesale water suppliers and other regional planning authorities, general plans prepared by cities and counties, and statewide and broad regional water resource plans prepared by DWR, SWRCB, or other state agencies.

UWMPs are updated every five years. The Urban Water Management Plan Act was enacted in 1983. Over the years it has been amended in response to water resource challenges and planning imperatives confronting California. A significant amendment was made in 2009 as a result of the
governor’s call for a statewide 20 percent reduction in urban water use by 2020. Colloquially known as 20x2020, the Water Conservation Act of 2009 (also referred to as SB X7-7) required urban retail water suppliers to establish water use targets for 2015 and 2020 that would result in statewide water savings of 20 percent by 2020. Beginning in 2016, urban retail water suppliers are required to comply with the water conservation requirements in SB X7-7 in order to be eligible for state water grants or loans. Chapter 5 of the Cal Water’s Salinas District UWMP contains the data and calculations used to determine compliance with these requirements (Cal Water 2016, pp. 11-12).

City of Salinas General Plan. The General Plan contains policies and implementation actions which address water supply and water demand consistent with regulatory requirements, and whose implementation may serve as mitigation for significant impacts. These include the following:

**Policy LU-6.2:** Review development proposals to ensure that adequate water supplies, treatment, and distribution capacity is available to meet the needs of the development without negatively impacting the existing community.

**Policy LU-6.3:** Participate in and support regional programs and projects that target the improvement and conservation of the region’s groundwater and surface water supply.

**Policy LU-6.4:** Actively promote water conservation by City residents, businesses and surrounding agricultural producers.

**Policy LU-6.5:** Review projects such as residential projects with 500 or more units for compliance with Sections 10910-10915 of the California Water Code.

**Policy COS-1.5:** Cooperate with the Monterey County Water Resources Agency, the State Water Resources Control Board, and the Regional Water Quality Control Board to implement programs that address the two primary causes of poor water quality in the planning area: salt water intrusion and nitrate contamination.

**Policy COS-2.2:** Work with water providers to institute conservation programs to address water supply problems caused by groundwater overdrafting.

**Policy COS-2.3:** Apply standards that promote water conservation in agricultural, residential, and non-residential uses.
Policy COS-2.4: Enforce the City’s Water Conservation Ordinance.

Implementation Program COS-1: To reduce pollutants in urban runoff, require new development projects and substantial rehabilitation projects to incorporate Best Management Practices (BMPs) pursuant to the National Pollutant Discharge Elimination System (NPDES) permit to ensure that the City complies with applicable state and federal regulations.

Salinas Stormwater Development Standards for New and Redevelopment Standards (2013). The Salinas Stormwater Development Standards (SWDS) are described in the Regulatory Setting section of Section 3.9, Hydrology. Regarding their relationship to water supply, the SWDS require in part that new sources of storm water be managed to minimize changes in the rate and volume of new discharges to existing storm drainage facilities. For example, the SWDS require the evaluation of post-construction storm water requirements that are based upon the creation and/or replacement of impervious and/or managed turf surfaces. To achieve consistency with the SWDS, Low Impact Development (LID) storm water treatment measures, such as storm water planters, bioswales and pervious pavements, and infiltration basins, must be incorporated into new development as must other BMP practices. These types of measures would facilitate groundwater recharge in future projects proposed within the Target Areas.

City of Salinas Municipal Code. Municipal Code Chapter 36A specifically addresses water conservation and its relationship to water resource management. The purpose of the regulation is to facilitate water conservation in Salinas. This is to be done by implementing the City’s Urban Water Conservation Plan, designed in significant part to reduce pumping from the Salinas Valley Groundwater Basin. The City’s goal is to reduce pumping by 15 percent relative to the baseline year of 1987. The regulation is also intended to ensure that water conservation actions are integrated into the design and construction of new development projects and to address water efficient landscaping.

Proposed EDE Policies

The EDE contains policies and implementation actions which directly or indirectly address water supply and water use. These include the following:

Action I-3.1.6. Utilize the vision and planning effort for Carr Lake to direct storm water for capture and reuse within the City or for surrounding communities for recharge or irrigation purposes.

Policy ED-I-3.2. Redesign existing wastewater and storm drainage infrastructure systems, including broad municipal level wastewater and
storm water solutions for water reuse, and ensure that outdated infrastructure is upgraded to accommodate existing and future businesses.

**Action I-3.2.1.** Work with Monterey Regional Water Pollution Control Agency (MRWPCA) and the Monterey County Water Resources Agency (MCWRA) to create a viable water source from conversion of industrial wastewater and capture of storm water from the City.

**Action I-3.2.2.** Implement development regulations that require new development and redevelopment projects to install ‘purple pipe’ improvements to allow for use of reclaimed water.

**Action I-3.2.3.** Design, fund and construct improvements to the Industrial Waste Water Treatment Facility to convert the wastewater into potable water or aquifer recharge water for sale or reuse.

**Action I-3.2.4.** Plan, design, fund, and construct improvements to the City’s storm water system to allow direct flow to the Industrial Waste Water Treatment Facility for capture and reuse.

**Policy ED-I-3.5.** Pursue public-private partnerships to increase access to and potentially fund energy, water, resource recycling and reuse, dark fiber communications, and other infrastructure capacity.

**Action I-3.5.2.** Allocate resources to implement the City’s Memorandum of Understanding with DeepWater Desal to bring additional sources of water, energy, and dark fiber communications connectivity to the City.

**Action EGB-2.3.3.** Support development of seawater desalination facilities, expanded groundwater recharge, and capture and reuse of storm water and agricultural wash water in Monterey County, if cost effective and feasible, to obtain new water supplies for Salinas.

**Standards of Significance**

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of groundwater impacts, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on this subject, or indeed on any subject addressed in the checklist. *(Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.)* Rather, with few exceptions, “CEQA grants agencies discretion to develop their
own thresholds of significance.” (Ibid.) Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- substantially deplete groundwater supplies resulting in insufficient water supplies available to serve the project from existing entitlements and resources, or resulting in the need for new or expanded entitlements; or

- interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., would the production rate of preexisting nearby wells drop to a level which would not support existing land uses or planned uses for which permits have been granted.

Analysis, Impacts, and Mitigation

Potential impacts of developing the Target Areas are evaluated in this EIR at the level of detail commensurate with the project description as provided in Section 2.3, Project Description. Individual future projects proposed within the Target Areas would be subject to additional detailed CEQA evaluation based on detailed project description information that accompanies project-level entitlement applications.

IMPACT: THE PROPOSED PROJECT WOULD REDUCE THE AMOUNT OF GROUNDWATER DEMAND FROM AGRICULTURAL USE OF THE TARGET AREAS BY APPROXIMATELY 556 ACRE-FEET PER YEAR (BENEFICIAL IMPACT)

The proposed project would replace agricultural water uses with urban water uses. The net change in water demand derived from this conversion is the difference between the existing agricultural baseline demand and water demand from development within the Target Areas. The groundwater basin is currently in overdraft. If the proposed project results in increased water demand that must be met by expanded groundwater pumping within the Pressure Subarea and/or the East Side Subarea, the proposed project would likely exacerbate overdraft and seawater intrusion conditions. In this case, the sufficiency of water supply entitlements from Cal Water could be in question given the impact. The following analysis examines the net change in water demand.

Baseline Agricultural Water Demand

Baseline water demand is comprised of demand from agricultural uses within the Target Areas. The proposed Target Areas comprise 558 acres. The vast majority of this acreage is currently in agricultural production. However, based on review of aerial imagery, not all of the land is in
active agricultural production. Approximately 10 percent of the total land area is assumed to be in non-irrigated uses such as farm buildings, agricultural access/field roads, and other agricultural production support uses. For purposes of this analysis, 90 percent of the total of the 558 acres, or 502 acres, are assumed to be actively irrigated. Agricultural irrigation is considered to be the sole source of baseline water demand.

This baseline water demand analysis follows the methodology used in Cal Water’s WASP WSA (Yarn & Associates 2015). That is, water demand factors for various crop types are multiplied by the number of crops grown per year and the acreage of production for each crop type to arrive at gross demand. The volume of irrigation water that percolates back to groundwater is then calculated and subtracted from the gross demand to arrive at the net consumptive agricultural demand.

Cool season crops are the predominant crop types grown in the north end of the Salinas Valley, including in the Salinas area. Lettuces, broccoli, cauliflower, and strawberries, celery, spinach, and artichokes are representative of these crop types. Lettuce, broccoli, cauliflower, and strawberry crops are ranked among the highest in the County in terms of acreage in production (County of Monterey Agricultural Commissioner 2015). They are commonly grown on agricultural land within and adjacent to the City, including the Target Areas and the conceptual expressway locations. Between two and three crops of each type are grown annually, as is also true for other cool season crop types. While as many as three crops can be produced in a year, normal practice is to grow two crops. Irrigation is by sprinkler or drip systems, with irrigation water pumped form agricultural wells.

Irrigation rates vary per crop type. At the lower rate end, average demand for strawberries is 1.9 feet/acre/crop. Broccoli and cauliflower are at the higher rate end at 4.04 feet/acre/crop. Water demand for lettuce is 2.1 feet/acre/crop (Yarne & Associates 2015, p. 8). For purposes of this analysis, it is assumed that these four crop types are grown within the Target Areas and expressway locations. Broccoli and cauliflower are grouped together because their irrigation water demand rate is the same. Given that these four crop types also represent a reasonable range of irrigation water demand rates, it is assumed that these crop types are grown in equal proportion on land within the Target Areas and expressway locations. Table 44, Average Irrigation Groundwater Demand/Acre shows that the average irrigation water demand rate per acre would be 2.67 AFY.

Table 45, Baseline Agricultural Water Demand, summarizes the baseline agricultural water demand. An average of 30 percent of agricultural irrigation water is estimated to percolate back to groundwater (Yarne & Associates 2015, p. 8), such that 70 percent of applied irrigation water is consumed by plants, evaporates, lost to evapotranspiration, etc. With this assumption, the number of irrigated acres, the average irrigation volume/acre, and crops grown per acre per year, the net baseline agricultural water demand is calculated at 2,250 AFY.
### Table 44 Average Irrigation Groundwater Demand/Acre

<table>
<thead>
<tr>
<th>Crop Type</th>
<th>Demand/Acre (AFY)</th>
<th>Proportion of Crop Grown/Acre</th>
<th>Avg. Demand/Acre (AFY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lettuce</td>
<td>2.1</td>
<td>.33</td>
<td>.69</td>
</tr>
<tr>
<td>Broccoli/Cauliflower</td>
<td>4.04</td>
<td>.33</td>
<td>1.33</td>
</tr>
<tr>
<td>Strawberries</td>
<td>1.9</td>
<td>.34</td>
<td>.65</td>
</tr>
<tr>
<td><strong>Average Demand/Acre</strong></td>
<td></td>
<td></td>
<td><strong>2.67</strong></td>
</tr>
</tbody>
</table>


### Table 45 Net Baseline Agricultural Water Demand

<table>
<thead>
<tr>
<th>Acres Irrigated</th>
<th>Irrigation Factor (AF/Crop)¹</th>
<th>Crops Per Year/Acre</th>
<th>Gross Demand (AFY)</th>
<th>% of Gross Demand Consumed</th>
<th>Net Baseline Demand (AFY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agricultural Demand</td>
<td>502</td>
<td>2.67</td>
<td>2</td>
<td>2,680</td>
<td>70</td>
</tr>
</tbody>
</table>

*Source:* EMC Planning Group 2017

*Note:* ¹Average of demand factors for lettuce, broccoli/cauliflower, and strawberries grown in equal proportion.

### Proposed Project Gross Water Demand

With implementation of the proposed project, water demand would shift over time from agricultural use to urban demand from retail, industrial, and business park uses within the Target Areas. The following analysis summarizes the net total water demand from conversion of agricultural uses to urban uses.

Water demand factors for non-residential uses were obtained from Cal Water as part of the City’s consultation with Cal Water conducted pursuant to California Government Code section 65352(a)(7). Based on a Cal Water staff analysis using data contained in its 2015 UWMP and additional analysis based on historic water demand from specific classes of businesses in Salinas, Cal Water conservatively assumes that the average water demand from non-residential uses in Salinas is 4.5 AFY/acre (telephone communication with Jonathan Keck, Cal Water, July 25, 2016). **Table 46,** Proposed Project Gross Water Demand, summarizes the net project annual water demand.
Table 46  Proposed Project Gross Water Demand

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Gross Acres</th>
<th>Water Demand (AFY/Acre)</th>
<th>Subtotal (AFY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial</td>
<td>147</td>
<td>4.5</td>
<td>661.5</td>
</tr>
<tr>
<td>Retail</td>
<td>279</td>
<td>4.5</td>
<td>1,255.5</td>
</tr>
<tr>
<td>Business Park</td>
<td>132</td>
<td>4.5</td>
<td>594.0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>558</strong></td>
<td></td>
<td><strong>2,511.0</strong></td>
</tr>
</tbody>
</table>

Source: EMC Planning Group 2017

Note: ¹Water demand factor from Cal Water 2016.

Gross Water Demand Reductions

The gross project water demand shown in Table 46 will be reduced in several ways. The net water demand (or “consumptive use”) reflects reductions in gross demand resulting from several sources of project-related groundwater recharge. Each of these is described below.

Recharge from Landscape Irrigation. Based on data included in WASP WSA, approximately 15 percent of the total urban water demand will be used outdoors for landscaping. Of that amount, approximately 20 percent is assumed to infiltrate to groundwater (Yarne & Associates 2015, p. 9). Applying these factors to the total water demand volume, approximately 75 AFY of the total project demand would be recharged to groundwater: 2,511 AFY x 0.15 x 0.20 = 75 AFY.

Indirect Recharge via Wastewater Percolation/Reuse. Indoor use within new industrial, retail and business park use buildings comprises the balance of urban water demand. Approximately 85 percent of the water used in industrial buildings is discharged as wastewater. This equates to 562 AFY: .85 x 661.5 AFY = 562 AFY. Wastewater from industrial uses would be conveyed to the City’s industrial wastewater treatment plant. This flow would then either be held for treatment and percolated back to groundwater at the treatment plant or diverted to the Regional Treatment Plant for tertiary treatment to produce recycled water through the Pure Water Monterey project (as described in the Environmental Setting section above). To be conservative, it is assumed that 80 percent of this wastewater would either percolate back to groundwater and/or be recycled for agricultural irrigation use. This equates to 450 AFY: .80 x 562 AFY = 450 AFY. The water recycled for agricultural use would replace an equivalent volume of groundwater that would otherwise be pumped for irrigation use.

The combined 1,850 AFY of wastewater flows from retail and business park uses would be conveyed to the MRWPCA Regional Treatment Plant for tertiary treatment. Approximately 60
percent of tertiary treated effluent produced at the plant is used for agricultural crop irrigation through the Castroville Seawater Intrusion Project. Based on 2015 MRWPCA data, annual average daily flow to the plant was about 23,540 AFY. Salinas contributes approximately 60 percent of the total wastewater flows to the regional plant. In 2015, approximately 14,124 AFY, or 60 percent of all treated water was used for agricultural irrigation. Therefore, the City supplies approximately 36 percent of the wastewater flow to the regional plant that is treated and used for agricultural irrigation (Yarne & Associates 2015, p. 9). Consequently, the proposed project would generate approximately 666 AFY: \(0.36 \times 1,850\) AFY = 666 AFY of irrigation water that would replace an equivalent volume of irrigation water that would otherwise be pumped by agricultural users from groundwater.

**Net Change in Water Demand**

Table 47, Net Project Water Demand, summarizes total project water demand information when recharge volumes are subtracted from total gross project demand. The table illustrates that the proposed project would have a substantial net positive effect on groundwater overdraft and seawater intrusion by increasing the amount of groundwater that remains in storage by approximately 556 AFY relative to existing baseline agricultural uses. As described in the Environmental Setting section above, Cal Water extracts groundwater from the hydraulically connected subbasins of the groundwater basin known as the Pressure Subarea and the East Side Subarea. Much of the water supply for Salinas is extracted from the Pressure Subarea. The project site is located in the Pressure Subarea. Therefore, the reduced groundwater pumping that would occur under post-project conditions will benefit groundwater storage within the same subarea from which Cal Water extracts the majority of its water supply.

Provided the Target Areas now located outside the Cal Water service boundary are brought into the Cal Water service area, sufficient groundwater would be available for Cal Water to provide service to the proposed project. No additional water supply resources would be required for this purpose. Cal Water must obtain approval of the California Public Utilities Commission to modify its service area. That process typically takes approximately 30 days from the day Cal Water makes the request to the California Public Utilities Commission. Cal Water typically initiates this process at the request of a project developer who is requesting water service from Cal Water. For the proposed project, that request is likely to be made in parallel with one or more developers submitting entitlement applications to develop one or more of the Target Areas. If a subject Target Area remains outside the City’s SOI at that time, the entitlement package would likely include requests for approval of a SOI amendment, annexation, specific plan, and individual project development. LAFCO is the approving agency for SOI amendments and annexations.
### Table 47  Net Project Water Demand

<table>
<thead>
<tr>
<th>Demand/Savings Source</th>
<th>Volume (AFY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Project Demand at Build Out</td>
<td>2,511</td>
</tr>
<tr>
<td>Groundwater Recharge/Agricultural Reuse</td>
<td></td>
</tr>
<tr>
<td>Outdoor Water Recharged</td>
<td>75</td>
</tr>
<tr>
<td>Industrial Wastewater Recharged/Recycled</td>
<td>450</td>
</tr>
<tr>
<td>Retail/Business Park Wastewater Recycled</td>
<td>666</td>
</tr>
<tr>
<td>Subtotal Groundwater Recharge/Agricultural Reuse</td>
<td>(1,191)</td>
</tr>
<tr>
<td>Net Proposed Project Groundwater Demand</td>
<td>1,320</td>
</tr>
<tr>
<td>Net Baseline Groundwater Demand</td>
<td>1,876</td>
</tr>
<tr>
<td>Increase in Groundwater Storage (Net Baseline – Net Project)</td>
<td>556</td>
</tr>
</tbody>
</table>

Source: EMC Planning Group 2017

Future urban use water demand from the project is likely to be lower than projected in part due to existing and anticipated future water conservation regulations. The non-residential water demand factor provided by Cal Water is based on average non-residential water use in the City. As older existing development is replaced through redevelopment, the average water demand factor is likely to decline over time as regulation-driven improvements in water conservation are implemented by new development. Further, new development within the Target Areas will likely be subject to water conservation regulations adopted over time that are more stringent that those in place today.

**IMPACT: POTENTIAL REDUCED GROUNDWATER RECHARGE POTENTIAL AND GROUNDWATER LEVELS FROM DEVELOPMENT OF THE TARGET AREAS (LESS THAN SIGNIFICANT)**

The primary sources for recharge of the Salinas Valley aquifers are from stream infiltration mainly from the Salinas River, Arroyo Seco River, and other smaller tributaries, with a lesser extent from percolation of irrigation return flows and precipitation. Development within the Target Areas will result in a substantial increase in impervious area relative to existing conditions. Agricultural lands would be converted to impervious surfaces for roads, parking areas, buildings, etc. This would result in an incremental loss of groundwater recharge potential relative to existing conditions.
Some groundwater recharge will occur under Target Area buildout conditions. All of the 558 acres of land within the Target Areas is conservatively assumed to be available for percolating irrigation water. Considering zoning development standards, a minimum of 10 percent of this acreage, or approximately 56 acres, must remain in open space/landscaping. A portion of landscape irrigation water would percolate to groundwater. In addition, required storm water management actions would incrementally reduce loss of storm water recharge potential. Current post-development storm water management requirements identified in the City’s SWDS include measures that must be incorporated into new development to improve the quality of storm water discharged from development sites. Measures such as bioswales and storm water detention facilities allow for storm water recharge. Please refer to Section 3.9, Hydrology and Water Quality, for more information on these requirements.

Though storm water recharge potential could be reduced under Target Area buildout and expressway development conditions, required compliance with the SWDS would assure that substantial capacity for storm water recharge will remain such that the impact on lowering of the groundwater level would be less than significant.

### 3.15 Effects Found Not To Be Significant

Section 15128 of the CEQA Guidelines requires an EIR to “contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.” The proposed project would have no impacts or less than significant related to the topics of land use and planning, mineral resources, population and housing, recreation, schools, and solid waste. These topics are analyzed in this single section of the EIR.

**Land Use and Planning**

CEQA Guidelines Appendix G is a sample Initial Study checklist that includes number of factual inquiries related to the subject of land use and planning, as it does on a whole series of additional environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on this subject, or indeed on any subject addressed in the checklist. *(Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal.App.4th 1059, 1068.)* Rather, with few exceptions, “CEQA grants agencies discretion to develop their own thresholds of significance.” *(Ibid.)* Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The City has done so here. Thus, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:
- Physically divide an established community;
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

The proposed project would result in construction and operation of new development projects located inside the city limits within Target Area V, and outside the SOI within Target Areas B, F, N, K and L2. Future development within Target Area V is considered infill development as it would be adjacent to existing urban development on three sides. Future development within Target Areas B, F, N, K and L2 would be an extension of the City’s existing urban development pattern. All of the Target Areas are located on existing agricultural land such that their development would not have potential to divide existing developed communities.

The potential for the proposed project to conflict with existing plans, policies or regulations that serve to mitigate environmental effects is addressed in other sections of this EIR. General Plan policies and Municipal Code standards that serve these purposes are identified throughout the analysis of individual environmental topics in Section 3.0 where applicable. Where the proposed project may be inconsistent with policies and standards, this is so noted either directly or indirectly through the determination of project impacts and associated mitigation measures. Similarly, plans and policies of other agencies with jurisdiction over/interest in the proposed project are also identified throughout this EIR. For example, habitat conservation plans are identified in Section 3.4, Biological Resources, consistency with air district air quality plans is described in Section 3.3, Air Quality, and consistency with the Regional Transportation Plan, is discussed in Section 3.12, Transportation.

**Consistency with Local Agency Formation Commission of Monterey County (LAFCO) Policies**

Any proposed annexations or changes to the City’s Sphere of Influence (SOI), or other changes of organization, would be required to meet LAFCO’s standards for evaluation. Any proposed changes to the SOI would require discussion of:

i) present and planned land uses in the area, including agricultural and open spaces;

ii) present and probable need for public facilities and services in the area;
iii) present capacity of public facilities and the adequacy of public services which the agency provides or is authorized to provide;

iv) existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency; and

v) present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing SOI.

Adopting or amending a SOI does not assure that the subject area will be annexed to the agency, and any proposed annexation would have to go through procedural guidelines for annexations under LAFCO (LAFCO of Monterey County Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization, adopted February 2013).

For any SOI or annexation application, LAFCO shall consider as part of its decision whether the proposal mitigates its regional traffic impacts. This would include monetary contribution to a regional transportation improvement fund as established by the Transportation Agency of Monterey County. LAFCO’s adopted policies state that when considering boundary changes in annexation, proposal boundaries should:

i) follow existing political boundaries and natural or man-made features such as rivers, lakes, railroad tracks, and freeways to the greatest extent possible;

ii) not be drawn so as to create an island, corridor, or strip either within the proposed territory or immediately adjacent to it, unless justification is provided for non-conformance with this standard;

iii) avoid dividing assessment parcels whenever possible; (iv) have all streets and rights-of-way be placed within the same jurisdiction as the properties which abut thereon and/or for the benefit of which streets and rights-of-way are intended; and

iv) avoid dividing an existing identifiable community, commercial district, or other area having social or economic homogeneity, unless justification for non-conformance to this standard is provided.

Items that should not be allowed in proposals related to road right-of-ways include city limits which include a portion of the road right-of-way, road islands of county maintained roads, island roads caused by annexation on both sides, and strip annexation roads. Minor local roads; when the street will be used for the city sewer lines, water lines, or storm drains; piece-meal development by developer causing difficult coordination between two or more agencies; and places where annexation will complicate drainage or traffic control, should be annexed to the City. Boundary changes should occur concurrently, and should reasonably include all territory which would reasonably benefit from agency services.
All environmental factors introduced by any annexation proposal shall be considered as outlined in CEQA and the State Guidelines. The potential environmental impacts of annexation or SOI proposals shall be reviewed by the LAFCO in accordance with CEQA.

**Mineral Resources**

Using language taken from the sample Initial Study Checklist found in Appendix G to the CEQA Guidelines, the City has determined that a proposed project may have a significant effect on mineral resources if the project would:

- 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; or
- 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.

The General Plan EIR identifies that there are no mineral resources within the General Plan planning area (General Plan EIR p. 5.10-2). With the exception of Target Area V, the remaining Target Areas are located outside the planning area.

Mineral resources management regulations and resource conditions in the broader County, including areas bordering the City, are discussed in the County General Plan EIR (ICF Jones & Stokes 2008, p. 4.5-2). The California Surface Mining and Reclamation Act of 1975 requires the classification of land into Mineral Resources Zones according to its known or inferred mineral potential. The classification process is based solely on the underlying geology without regard to existing land use or land ownership. The primary goal of the mineral land classification is to ensure that the mineral potential of the land is recognized by local government decisionmakers and is considered before making land use decisions that could preclude mining.

Aggregate resources are classified by the State Geologist into four mineral resources zones based on the likelihood of the presence of mineral deposits and their economic value. This mineral land classification is used to help identify and protect mineral resources in areas within the State subject to urban expansion or other irreversible land use changes that would preclude future mineral extraction. Mineral Resource Zone 1 defines areas of no mineral resource significance. Figure 4.5.1 contained in the County General Plan shows that the entire City, as well as land within Target Areas K, N, and V is within Mineral Resource Zone 1 (http://www.co.monterey.ca.us/planning/gpu/2007_GPU_DEIR_Sept_2008/Exhibits/Exh_4-5-1_MineralResources.pdf). Land within Target Areas B, F, and L1 are not within a Mineral Resource Zone. Therefore, development of the Target Areas would not have significant impacts resulting from loss of availability of a known mineral resource.
**Population and Housing**

Using language taken from the sample Initial Study Checklist found in Appendix G to the CEQA Guidelines, the City has determined that a proposed project may have a significant effect on population and housing if the project would:

- Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure);
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The proposed project would result in construction of new industrial, retail, and business park uses. No new residential development capacity is planned. Therefore, the proposed project would not have significant impacts related to a substantial direct increase in population.

The proposed project is designed solely to create additional developable land capacity for job generating development needed to meet the City’s long-term employment needs through buildout of the existing General Plan. While it is likely that some employment opportunities created by development within the Target Areas could be filled by individuals from outside the local area, the City’s goal is to meet the employment needs of its current and growing population. Therefore, the proposed project would not have significant impacts from substantial population growth as that growth is already envisioned by the City as demonstrated by population growth projections included in the General Plan.

The Target Areas are currently in agricultural use and contain few dwelling units. The proposed project would not have significant impacts from displacement of a substantial number of homes or people.

**Parks and Recreation**

Using language taken from the sample Initial Study Checklist found in Appendix G to the CEQA Guidelines, the City has determined that a proposed project may have a significant effect on park and recreational resources if the project would:

- 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; or
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.
The proposed project will result in development of new industrial, retail, and business park projects. The proposed project does not include new capacity for residential development. Therefore, it would not directly result in increased population and resulting increased demand for use of existing parks or increased demand for new parks. New parks are not planned as part of the proposed project. The proposed project would have no impacts from activities related to rehabilitation of existing or construction of new parks. The proposed project would not have significant impacts related to parks and recreation.

**Schools**

Using language taken from the sample Initial Study Checklist found in Appendix G to the CEQA Guidelines, the City has determined that a proposed project may have a significant effect on the environment if the project would:

- Result in substantial adverse physical impacts associated with the provision of or need for new or physically altered school facilities, the construction of which could cause significant environmental impacts.

Regarding impacts from construction of new schools, the proposed project does not provide for new residential development capacity. Therefore, the proposed project would not generate a direct increase in population that could result in increased demand for new or expanded school facilities. The proposed project would not have significant impacts related to construction of new school facilities.

New residential, commercial and industrial land project developers are required to pay school impact fees for developments within the Salinas City Elementary School District and Salinas Union High School District (Tracy Yamamoto, personal communications, November 18, 2016), Alisal Union School District (Jim Koenig, email message, December 5, 2016), and Santa Rita Unified School District (Corey Burbach, email message, December 5, 2016). Payment of these school impact fees will be used to support the facility needs of the respective school districts. Analysis of the impacts of building new schools would be undertaken by the respective school districts as the lead agencies for their own school projects. This proposed project – the EDE – will not contribute to the need for any such new school projects, however.

**Solid Waste**

Using language taken from the sample Initial Study Checklist found in Appendix G to the CEQA Guidelines, the City has determined that a proposed project may have a significant effect on the environment if the project would:

- Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs; or
Fail to comply with federal, state, and local statutes and regulations related to solid waste.

New development within the Target Areas will generate solid waste during its construction and operations. Solid waste would likely be delivered to the Johnson Canyon Landfill that is operated by the Salinas Valley Solid Waste Authority, of which the City is a member, or to other facilities that may be developed or secured by the Salinas Valley Solid Waste Authority over time. New developments within the Target Areas would be required to participate in the Salinas Valley Solid Waste Authority’s recycling and waste reduction programs. Recyclable materials would be delivered to the Salinas Valley Solid Waste Authority’s Sun Street Transfer facility where the materials would be segregated and recycled consistent with state solid waste diversion regulations. The Sun Street Transfer facility also operates a Household Hazardous Waste Collection Facility that collects waste oil, batteries, household pesticides, antifreeze, electronic wastes and other household hazardous waste.

The Salinas Valley Solid Waste Authority is responsible for ensuring that the cumulative solid waste disposal capacity needs of its member jurisdictions are met over time through expansion of existing landfill capacity, creation of new landfill capacity, and/or deployment of waste conversion technology that substitutes for landfill disposal capacity. The Johnson Canyon Landfill service life is approximately 38 years at current permitted capacity and rate of waste fill with no new waste diversion programs. If the landfill is expanded, the anticipated service life will range from 80 to 100 years. In the event that the landfill reaches full capacity, the Salinas Valley Solid Waste Authority has several options to choose from including expanding the landfill beyond its current permitted capacity, reconsidering expansion of the closed Jolon Road Landfill, or seeking landfill capacity in the region but outside of their service area (i.e. Monterey Peninsula Landfill located north of Marina, Kirby Canyon Landfill in Santa Clara County or John Smith Landfill in San Benito County).

The Salinas Valley Solid Waste Authority is also evaluating the potential use of a Clean Fiber and Organics Recovery System, which is an advanced waste recovery technology that could conservatively extend the life of Johnson Canyon Landfill (without any further expansion) to approximately 90 to 100 years. With further expansion of the Johnson Canyon Landfill or export of residual waste from the advance waste recovery technology process, the landfill life could be extended well beyond 200 years.

Other waste reduction programs are also in planning such as expanded construction and demolition waste processing and food waste composting that would further reduce landfill dependence beyond the above-noted service life estimates for Johnson Canyon Landfill (Email communication with Patrick Mathews, Salinas Valley Solid Waste Authority General Manager, November 22, 2016).
At this time, there is no evidence to suggest that solid waste capacity demand of new development within Target Areas B, F, N, K, L2 and V will, in and of itself, trigger the need for development of additional landfill capacity. Therefore, this impact is less than significant. New landfill capacity/disposal projects proposed by the Salinas Valley Solid Waste Authority for this purpose will undergo separate CEQA review at the time such projects are proposed, with the Salinas Valley Solid Waste Authority acting as lead agency.

The Salinas Valley Solid Waste Authority is responsible for ensuring that its solid waste management activities are consistent with related state regulatory requirements. As needed, the Salinas Valley Solid Waste Authority would, through its member agencies, including the City, implement programs (e.g. recycling, diversion, etc.) in which new development within the Target Areas must participate. The proposed project would not have significant impacts related to solid waste.
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4.0 CUMULATIVE IMPACTS

4.1 CEQA REQUIREMENTS

CEQA requires that an EIR contain an assessment of the cumulative impacts associated with a proposed project. This assessment involves examining project-related effects on the environment in the context of similar effects that have been caused by past or existing projects, as well as the anticipated effects of probable future projects. Although a project impact can be minor, the significance of its incremental contribution to the cumulative effects caused by the project together with other projects must be evaluated. CEQA Guidelines Section 15130 requires a discussion of cumulative impacts when a project has possible environmental effects that are individually limited, but cumulatively considerable. The definition of cumulatively considerable found in Section 15065(a) (3) states:

Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” the lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. Incremental effects which are not considered cumulatively considerable need not be discussed in detail in an EIR. A lead agency must identify facts and analysis supporting its conclusion that the cumulative impact is less than significant.

Where a lead agency concludes that a cumulative effect of a project, taken together with the impacts of past, present, and probable future projects is significant, the lead agency then must determine whether the project’s incremental contribution to such significant cumulative impact is “cumulatively considerable.”
A lead agency may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and, therefore, is not significant if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency is required to identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

The discussion of cumulative impacts is required to reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the other identified projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

An EIR must examine reasonable, potentially feasible options for mitigating or avoiding a project’s contribution to any significant cumulative effects.

### 4.2 Cumulative Development Scenario

CEQA requires a cumulative development scenario to consist of either 1) a “list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency” or 2) a “summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.” (CEQA Guidelines, § 15130, subd. (b)(1); see also Rialto Citizens for Responsible Growth v. City of Rialto (2012) 208 Cal.App.4th 899, 928–931 [the travel demand model used for traffic analysis included a “summary of projections”].)

The cumulative development scenario varies with the environmental topic being considered. The geographic scope of the area affected by cumulative impacts is typically larger than the boundary of the project site itself. For purposes of analyzing cumulative impacts in this section of the EIR, the geographic scope of the area affected by cumulative impacts generally varies with the cumulative impact topic being considered. For example, cumulative development within the City plus development within the Target Areas is the geographic boundary for cumulative
impacts regarding police and fires services; the air basin is the geographic boundary used in the cumulative air quality analysis; the proposed project effect on climate change is evaluated at a state/global scale; and cumulative traffic conditions include consideration of traffic generated in the counties of Monterey, Santa Cruz, and San Benito that affects the roadway network in the City. In the cumulative development impact analysis for each environmental topic, the cumulative development scenario for that topic is first presented.

Generally, short-term construction impacts are not considered to contribute to cumulative impacts. Significant short-term construction impacts are generally avoided through the implementation of mitigation measures and it is unlikely that potential construction impacts within Target Areas would simultaneously combine with construction impacts from projects in the immediate area of one or more Target Areas to create cumulatively considerable, short-term construction impacts. GHGs generated during construction activities are an exception, as many types of GHGs are persistent in the atmosphere over periods of time that would extend well into the operational phase of a project.

Plan Projections and Projects Contributing to Cumulative Development Conditions for the City

For all environmental topics, at a minimum, the geographic scope of the cumulative impact analysis includes cumulative development within the City. For some topics, the geographic scope is larger than the City. Because cumulative development within the City is common to all the topic analyses, these conditions are reviewed here for reference. The cumulative development scenario for the City consists of buildout projections contained in the General Plan plus two additional proposed projects, the West Area Specific Plan and the Salinas Travel Center.

The development projections associated with the General Plan consider buildout conditions within the City’s sphere of influence (SOI) as identified in the General Plan. One significant change has been made to the SOI since 2002. In 2010, Salinas approved the Salinas-Ag Industrial Center. The project included modification of the SOI boundary and annexation of an approximately 257-acre project site located at the southwest corner of the Harris Road/Abbott Street intersection in the southwestern portion of the City. The project includes a probable development capacity of about 4,334,220 square feet of agricultural industrial oriented uses.

General Plan development projections and conditions most applicable to assessing the incremental cumulative effects of the proposed project are identified in Table 49, General Plan Based Cumulative Development Scenario. Information in the table is taken directly from Table 5.1.3 contained in the General Plan EIR plus the additional development capacity identified for the Salinas-Ag Industrial Center as described above.
For informational purposes, Table 48 also shows the projected EDE Target Area building square footage and the percentage increase in building capacity that it represents relative to General Plan plus Salinas-Ag Industrial Center buildout.

Table 48  General Plan Based Cumulative Development Scenario

<table>
<thead>
<tr>
<th></th>
<th>Dwelling Units</th>
<th>Building Square Footage</th>
<th>Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Plan</td>
<td>58,056</td>
<td>72,337,000</td>
<td>213,063</td>
</tr>
<tr>
<td>Salinas-Ag Industrial Center</td>
<td>0</td>
<td>4,334,220</td>
<td>0</td>
</tr>
<tr>
<td><strong>General Plan Buildout Subtotal</strong></td>
<td>58,056</td>
<td>76,671,220</td>
<td>213,063</td>
</tr>
<tr>
<td>Proposed EDE Buildout</td>
<td>0</td>
<td>5,255,959</td>
<td>0</td>
</tr>
<tr>
<td><strong>General Plan Buildout + Target Area Buildout</strong></td>
<td>58,056</td>
<td>81,927,179</td>
<td>0</td>
</tr>
<tr>
<td>General Plan Buildout % Change with Target Area Buildout</td>
<td>0</td>
<td>6.9</td>
<td>0</td>
</tr>
</tbody>
</table>

Source: City of Salinas General Plan Final Environmental Impact Report, 2002, Table 5.1.5; EMC Planning Group 2017

Salinas is in the process of considering another major proposed project, the West Area Specific Plan. The project encompasses approximately 442 acres. It is located within a Future Growth Area identified in the City of Salinas General Plan that is located north of Boronda Road. As such, development within the West Area Specific Plan boundary has been contemplated and this development is already part of the development projections for the General Plan as shown in Table 49. The area was annexed to the City after the General Plan was adopted. Primary planned uses include residential and commercial development. The City is also considering an additional notable proposed project, the Salinas Travel Center. This project is also located within a Future Growth Area adjacent to the southeastern city limit near the Salinas Municipal Airport and adjacent to U.S. Highway 101. The approximately 33-acre developable portion of the project site is proposed for a hotel and a travel center, with additional land capacity for future industrial uses. Total development capacity is 461,230 square feet of projected building development. Because the site is within a Future Growth Area, its development has been contemplated and this development is already part of the development projections for the General Plan shown in Table 48.
4.3 Proposed Project Contribution to Cumulative Impacts

The methodology for addressing each cumulative impact topic is: 1) identify the geographic boundary/scope of the cumulative impact; 2) identify whether past projects, other current projects, and probable future projects have combined to create a significant cumulative impact; 3) identify the contribution of the proposed project to the cumulative effect; and 4) determine whether the project’s contribution to the cumulative effect is considerable. Where the project impact is cumulatively considerable, mitigation measures are identified.

Development of the Target Areas is intended to support employment needs and economic development goals over the existing General Plan buildout period. As such, in specific cases, the topic-specific impact analyses conducted in Section 3.0 consider impacts of the proposed project over a relatively long timeframe, as full buildout of the General Plan would occur over time.

Aesthetics

Geographic Scope

The geographic scope for cumulative aesthetic impacts is agricultural land and urban areas visible from the segment of U.S. Highway 101 that passes through the Salinas Valley. This scope is selected because the proposed project (development within Target Areas B, F, N, L2, and K) affects visual conditions at the interface between urban development and adjacent agricultural land. The visual conditions it affects (development within Target Areas B, F, L2, and K) are characteristic of those found at similar urban/agricultural land interfaces along the U.S. Highway 101 corridor within the Salinas Valley. That is, the cumulative geographic scope includes agricultural land visible from the highway, as well as the cities along the corridor that are visible from the highway. These cities include Salinas, Gonzales, Soledad, Greenfield, and King City, where urban development at their fringes has converted, and will continue to convert, agricultural land to urban use, and where lighting from urban development has contributed, and will continue to contribute, to sky glow. While Target Area V is within the city limits, its development also represents visual impacts resulting from conversion of agricultural land to urban use as visible from U.S. Highway 101. Target Area N is not visible from U.S. Highway 101, yet its development is representative of visual impacts resulting from conversion of agricultural land at the urban/agricultural interface.

Existing urban development within the cities and the projections for future urban development that would continue to contribute to these visual effects are found in the general plans for the respective cities, and in the Monterey County’s Greater Salinas Area Plan and Central Salinas Valley Area Plan, both of which encompass unincorporated areas within the Salinas Valley.
Cumulative Impacts

Past and existing cumulative urban development within Salinas Valley cities and development within the Salinas Valley portions of the two Monterey County area plans noted previously has substantially changed scenic resource conditions by converting agricultural land, a major visual resource within the Salinas Valley, to urban landscape. Continued conversion of agricultural landscapes will occur as the cities continue to grow within their respective SOIs, and in their more distant futures, possibly beyond their existing SOIs as those boundaries may be expanded. The perception of change will be especially noticeable by travelers on U.S. Highway 101 given the substantial frequency of views from the highway. Views to open agricultural lands could also be blocked from the highway and from other local roadways within and adjacent to the cities, including Salinas.

Conversion of agricultural land to non-agricultural, developed uses also occurs within the Salinas Valley in unincorporated Monterey County. This most commonly occurs in individual locations where agricultural support related services projects have been constructed and may be constructed in the future. Many of these projects are located along the margins of U.S. Highway 101 as it passes through the Salinas Valley.

Consequently, past, present, and probable future development in the Salinas Valley that is or would be visible from U.S. Highway 101 and has converted agricultural land to urban use is considered to have cumulatively significant impacts on visual resource conditions.

Similarly, past and present urban development and development in unincorporated Monterey County require lighting that contributes to sky glow effects in the vicinity of the lighting sources. This is particularly true in the vicinity of the cities, where sky glow is commonly visible. Future development within the cities and unincorporated Monterey County will require lighting that contributes to existing sky glow. Past, present, and probable future development in the Salinas Valley that is or would be visible from U.S. Highway 101 is considered to have cumulatively significant impacts from sky glow.

Project Contribution to Cumulative Impacts

The analysis of visual resource impacts in Section 3.1 is based on changes created within each individual Target Area. That is, the significance of impacts in Section 3.1 is described on a Target Area by Target Area basis, rather than consideration of all Target Areas as a whole. The cumulative scenario considers visual impacts of the Target Areas as a whole relative to past, present and future probable development related to General Plan buildout.

As described in Section 3.1, Aesthetics, the proposed project would result in new urban development at the existing urban/agricultural fringe of the City, and in the case of Target Area V, within the city limits. Frequency of views to the individual Target Areas will differ as
described in Section 3.1. However, with the exception of Target Area N, all are directly visible from U.S. Highway 101 and the highest frequency of views of new development within them will be from the highway. There are few developed public facilities or uses (e.g. parks or schools or public institutional uses) from which views of the Target Areas are of long duration. Sensitivity to changes in visual conditions at the urban/agricultural fringe would likely be highest from U.S. Highway 101 on the northbound and southbound approaches to the City. Prior to these approaches, views from the highway are largely of rural, agricultural, and open space resources located to the north and south of the City. General Plan Table LU-3 shows that at General Plan buildout, the developed portion of the City would comprise approximately 13,328 acres. The proposed project would result in conversion of up to approximately 558 acres of agricultural land (of which 502 acres are classified as Important Farmland) to urban use, 115 acres of which are located within the city limits in Target Area V. Excluding Target Area F, all of the remaining Target Areas are currently located adjacent to existing urban development within the City. Target Area F is associated with a future interchange that has been studied at a conceptual level by Caltrans. Target Area F would only be developed if the interchange is constructed first. Thus, Target Area F would be located next to a significant urban infrastructure facility and would be located adjacent to future urban development within Target Area B.

Open agricultural landscapes and views to the Santa Lucia and Gabilan mountains are generally considered to be the prime visual resources in the County and in the vicinity of the City. The proposed project would result in an incremental loss of this resource and views to agricultural land and the mountains could be blocked for short durations of time from U.S. Highway 101 and for longer durations from local adjoining public roads where travel speeds are lower. The changes would occur contiguous to existing urban development, thus reducing the apparent magnitude of visual change from agricultural to urban use. Further, the Target Areas are not clustered, but rather distributed around the periphery of the City (with Target Area V located in the central portion of the City). The increment of visual change would not be substantial at any one Target Area relative to the cumulative development context. However, even in the context of cumulative development on agricultural land within the Salinas Valley that is/would be visible from U.S. Highway 101, the increment of visual change is considered to be cumulatively considerable in light of the significant increase in loss of scenically valuable agricultural land and the high frequency at which the changes would be observed. Therefore, the project impact is considered cumulatively considerable and cumulatively significant and unavoidable.

Conversion of scenic agricultural land to urban use cannot, in and of itself, be mitigated. However, all new development within the Target Areas will be reviewed as part of the City’s development review process. At that time, proposed projects will be reviewed for conformance with General Plan policies, including policies that specifically related to design of development along the U.S. Highway 101 corridor through the City, and with design standards contained in the Zoning Code. This process is intended to ensure that new development is designed in a visually sensitive manner.
The proposed project will result in an increase in sky glow due especially to building and parking lot lighting. The project-generated change is within the broader vicinity context of urban development within the City and within the Salinas Valley. With their dispersed locations at the urban/agricultural interface and locations largely at the edge of the City, the incremental change in sky glow effect from developed uses within the Target Areas is not likely to be highly discernable relative to cumulative conditions. The proposed project contribution to sky glow effects is, therefore, considered to be less than considerable. Sky glow effects will be reduced to the extent feasible by implementation of City regulations that require shielding of lighting to reduce light splay as described in the Regulatory Setting section of Section 3.1, Aesthetics.

**Agricultural Resources**

**Geographic Scope**

The geographic scope for cumulative agricultural resources impacts consists of agricultural land within Monterey County. This geographic scope is selected due to the limited availability of the resource and its critical role in the local and regional economy.

**Cumulative Impacts**

Past and existing development has contributed to substantial loss of productive farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) in the County over time. The California Department of Conservation monitors the conversion of important farmland through their Farmland Mapping and Monitoring Program. Detailed information can be found on the department’s website at: [http://www.conservation.ca.gov/dlrp/fmmp/Pages/Monterey.aspx](http://www.conservation.ca.gov/dlrp/fmmp/Pages/Monterey.aspx).

The Department of Conservation reports that in Monterey County over the period 1984 to 2014, approximately 10,591 acres of Prime Farmland were converted to non-agricultural use or reclassified as another type of farmland. However, acreage in farmland that is classified as Farmland of Statewide Importance increased by 6,232 acres and acreage classified as Farmland of Local Importance increased by 15,226 acres. These significant acreage increases may well result from the fact that 18,811 acres formerly classified as Grazing Land has been converted, likely as a result of reclassification to one or both of the noted farmland classifications as grazing land has been brought into agricultural production. A large percentage of this conversion may owe to significant expansion of vineyard land in south Monterey County. This data does not include farmland lost to non-agricultural use prior to 1984. Consequently, the data substantially under represents the total acreage of productive farmland converted over time. Given that the County’s most productive farmland is located on the floor of the Salinas Valley and the vast majority of the urban development found in incorporated cities and unincorporated areas of
urban development in the County has occurred on the valley floor, the total cumulative loss of productive farmland solely from conversion to urban development has been substantial over time.

Cities within the Salinas Valley will continue to expand at their edges over time and the County is likely to continue to permit individual development projects on agricultural land in unincorporated areas that convert agricultural land to non-agricultural use. The general plans of the cities define SOI boundaries that include agricultural land. Future growth within the respective SOIs will continue to result in loss of agricultural land. The general plans include growth policies intended to support necessary growth while minimizing conversion of agricultural land where possible. The Monterey County General Plan also includes such policies. Past and existing cumulative development within the County has resulted in a cumulatively significant impact on productive farmland, especially Prime Farmland, through conversion to urban and other uses. Probable future development within cities and unincorporated areas per the general plans of respective jurisdictions will likely worsen the cumulative impact.

**Project Contribution to Cumulative Impacts**

Development of the Target Areas as contemplated would result in the permanent conversion of approximately 502 acres of Important Farmland to non-agricultural uses as described in Section 3.2, Agriculture and Forest Resources. Prime Farmland represents a significant percentage of the important farmland that would be lost. Mitigation measure AG-1 requires that applicants for future development within the Target Areas pay an agricultural land conservation in-lieu fee and/or dedicate permanent conservation easements to a qualified third-party farmland conservation entity on off-site agricultural land of equal or better quality at a ratio of 1:1. While the 502 acres of Important Farmland to be converted is a fraction of the total amount of productive agricultural land on the floor of the Salinas Valley that has been converted as a result of past and existing development in the County, the project impact is considered to be cumulatively considerable (i.e., significant in and of itself) in the context of the critical nature of the productive agricultural land resources to the City and County. The noted mitigation measures will partially mitigate the cumulative impact, but not to less than considerable. Therefore, the project’s contribution to the cumulative impact is significant and unavoidable.

**Air Quality**

**Geographic Scope**

The geographic scope for cumulative air quality impacts is the boundary of the air basin, which encompasses Monterey, San Benito, and Santa Cruz counties. This is the area for which the
Monterey Bay Air Resources District has prepared plans for reducing specific type of air emissions and otherwise manages air quality to meet federal and state air quality standards.

**Cumulative Impacts**

Past and present development within the air basin has generated criteria air emissions through construction and operational activities. The air basin is currently in non-attainment for ozone and particulate matter relative to State Ambient Air Quality Standards. That is, past and present development has generated these emission types to the extent that their concentration within the air basin exceeds applicable standards, and therefore, this impact is cumulatively significant.

Cumulative development also has potential to result in traffic congestion wherein vehicles can produce air emissions, particularly carbon monoxide, at concentrations in localized areas (e.g. at congested intersections or along congested roadways) that could adversely affect adjacent sensitive receptors. To date, concentrations of carbon monoxide are known to have exceeded thresholds of significance, such that this impact is considered to be less-than-cumulatively significant.

Point sources of air emissions can adversely affect adjacent sensitive receptors, but due to the localized effects of point sources, it is unlikely that they would combine in a cumulative context to adversely affect the same population of sensitive receptors; the impact is less-than-cumulatively significant.

**Project Contribution to Cumulative Impacts**

Impacts of the proposed project on air quality are identified in Section 3.2, Air Quality. Consistent with air district guidance, a consistency determination serves as the analysis of cumulative impacts from generation of ozone precursors. Emissions of ozone precursors (i.e. NO$_x$) and particulate matter which are not consistent with the air quality plan are not accommodated by programs in the air quality plan and will have a significant cumulative impact unless offset. The proposed project is consistent with the air quality plan for ozone. Therefore, it would not result in cumulatively considerable air quality impacts from ozone/ozone precursors.

The air district considers cumulative impacts from contribution of particulate matter to be less than considerable if individual projects implement measures to reduce production of particulate matter during construction activities. Mitigation measure AQ-1 in Section 3.2 represents the measure needed for this purpose. This mitigation apply to all future development within the Target Areas. Consequently, the proposed project’s contribution to particulate matter impacts would be less than cumulatively considerable.

It is possible that new development within the Target Areas (especially industrial development within Target Area B), could include new point sources of air emissions. Without compliance to
air district regulations, new point sources could potentially impact sensitive receptors in the immediate vicinity. However, the proposed project's contribution to this effect would be less than cumulatively considerable. All point sources must be permitted by the air district and operate in compliance with air district rules and regulations designed to substantially reduce emissions and associated adverse effects. Stationary sources that comply with air district rules and regulations (e.g. Regulation IV regarding toxic air contaminants from stationary sources) generally do not create a significant impact on air quality. The air district requires permits for any activity that produces air contaminants. The air district’s Regulation II, Permits, provides for the review of new and modified stationary air pollution sources to meet provisions of the federal Clean Air Act and California Clean Air Act to ensure that such sources do not interfere with attainment or maintenance of ambient air quality standards.

The proposed project would contribute to elevated mobile source (vehicle) pollutant concentrations along roadways. Based on analysis included in Section 3.12, Transportation, and 2.2, Air Quality, pollution concentrations along roadways that may experience a significant increase in congestion with the addition of project traffic are not expected to reach potentially hazardous levels. Therefore, the proposed project's contribution to exposure of sensitive receptors to substantial pollutant concentrations would be less than cumulatively considerable.

**Biological Resources**

**Geographic Scope**

The cumulative impact scenario for biological resources is variable, depending on the specific resource being considered. The geographic distribution ranges for special-status species vary greatly depending largely on environmental factors such as habitat suitability criteria (e.g. some species may only occur locally while others may range throughout large geographic areas such as the western U.S.). For the purposes of cumulative analysis for special status species and other biological resources, including jurisdictional wetlands and waterways, the geographic boundary for cumulative impacts is generally defined as the nine 7.5-minute U.S. Geological Survey quadrangles centered on the City. These include the Prunedale, San Juan Bautista, Hollister, Salinas, Natividad, Mount Harlan, Spreckels, Chualar, and Gonzales quadrangles. A 7.5 minute quadrangle map typically covers an area of about 49 to 70 square miles. An analysis at this level is considered adequate for determining whether impacts could affect the sustainability of special status species and their habitats. Within this area, regulatory agencies and conservation organizations, including U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife, and California Native Plant Society, work to establish and update critical distribution range information for species thought to be declining within their geographic ranges due to habitat loss and degradation.
Cumulative Impacts

Past and present development within the nine-quadrangle geographic boundary identified above has reduced the range and number of multiple plant and wildlife species and contributed to threats to their continued viability. The fact that federal and state agencies recognize numerous plant and wildlife species with special status that requires their specific consideration and protection reflects that the respective species are declining in number and range relative to their historic occurrences. Special-status species are generally considered rare, restricted in distribution, declining throughout their range, and/or to have a critical, vulnerable stage in their life cycle, that warrants their protection and monitoring. Such development has also caused the loss of decline of sensitive natural plant communities including riparian, woodlands, and wetland communities, has constrained wildlife movement, and reduced nesting and foraging habitat for resident and migratory avian species. The impacts of past and present development on special-status species and protected habitat communities are cumulatively significant. Future probable projects that could be developed within the cumulative impact boundary based on general plans of agencies located within this boundary, including the County and Salinas, would further contribute to these cumulatively significant impacts.

Past and present development within the geographic boundary of cumulative impacts has resulted in impacts to wetlands and waterways under the jurisdiction of the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Central Coast Regional Water Quality Control Board. Much of this development was constructed after enactment of federal and state legislation that mandate protecting or conserving these resources through regulatory permitting processes. These permits commonly include wetland habitat restoration requirements or other appropriate mitigation to ensure no net loss of habitat functions and values. Probable future development projected per the general plans of agencies located within the cumulative impact boundary, including the County and Salinas, will be subject to the same regulatory requirements. Regardless, impacts of cumulative development on wetlands and waterways are cumulatively significant.

Project Contribution to Cumulative Impacts

Impacts of the proposed project on biological resources are discussed in Section 3.4, Biological Resources. Please refer to that section for more information. Potentially significant impacts on the special-status Congdon's tarplant are possible. Potentially significant impacts on special-status wildlife species, including California tiger salamander, nesting birds, western burrowing owl, dusky-footed woodrat, and bats (hoary bat, pallid bat, Townsend’s big-eared bat, and Yuma myotis) are possible. Implementation of mitigation measures BIO-1 to BIO-6 would reduce impacts on these species. The proposed project also has potential to impact jurisdictional
wetlands and/or waters of the U.S., and riparian habitat that may occur in Target Area V. Implementation of mitigation measure BIO-7 would reduce these impacts.

Nearly all of the new development that could occur with the proposed project is located on land that is in agricultural use. Generally, actively cultivated agricultural land in the Salinas Valley does not provide valuable habitat for habitat for most special-status species due to its regular disturbance and absence of cover for wildlife. Several of the potential impacts on special-status wildlife species are construction phase effects and do not constitute significant loss of habitat. Potential impacts on riparian habitat and waters of the U.S., if they do occur, would be isolated and of limited scale. Given the relatively low quality of the habitat that would be affected by the proposed project, as well as the anticipated effectiveness of mitigation measures BIO-1 through BIO-8, which reduce the project contribution to cumulative impacts, the impacts of the proposed project on biological resources are considered to be less than cumulatively considerable.

**Climate Change**

**Geographic Scope**

The geographic boundary for climate change impacts is global, but for purposes of CEQA evaluation, cumulative impacts are assessed relative to conditions within the state context. This boundary is appropriate as because the state has put in place a range of legislation, plans, and regulatory requirements for addressing/mitigating climate change effects and all new development within the state, including development within the Target Areas, is subject to compliance with state climate change legislation and regulations.

Project impacts on climate change are, therefore, inherently cumulative in nature, as its impacts are evaluated in the context of GHG emissions from existing development within the state plus statewide projections of future GHG emissions from future growth within the state. The proposed project’s contribution to statewide climate change impacts is discussed in Section 3.5, Climate Change.

**Cumulative Impacts**

Please refer to Section 3.5, Climate Change, for a review of the state’s legislative and regulatory framework for setting and achieving statewide GHG reduction goals. In summary, with continued implementation of state regulations aimed at achieving the state’s 2020 GHG reduction goal as embodied in AB 32, CARB has projected that the state is on target for achieving the goal. SB 32 sets a new GHG reduction goal for 2030 and the draft 2017 scoping plan sets forth the suite of statewide actions needed to achieve that goals. Nevertheless, it is
uncertain at this time whether this goal can be achieved as it would be speculative to assume that
the required actions can and will achieve their anticipated GHG emissions objectives. Therefore,
the contribution of cumulative development within the state to climate change impacts in 2030
and possibly beyond is assumed to be significant.

Project Contribution to Cumulative Impacts

The analysis contained in Section 3.5, Climate Change, concludes that the proposed project
would have significant unavoidable impact on climate change. Mitigation measure GHG-1 is
designed to reduce GHG emissions from future development within the Target Areas. However,
even with implementation of the mitigation measure, the project contribution to cumulative
impacts is considerable and cumulatively significant and unavoidable. This conclusion is made
in large part due to uncertainty about whether future development will be able to reduce its
contribution to climate change impacts to less than significant. Combined with the long-term
buildout timeframe for new development, the absence of long-term GHG reduction guidance
(applicable, qualified GHG reduction plan), uncertainty about future GHG reduction
opportunities that may be afforded by future state legislative/regulatory actions, and uncertainty
about how new GHG reduction technologies/strategies will evolve over the long term, it would
be speculative to conclude that the proposed project impact is less than cumulatively
considerable.

Cultural Resources

Geographic Scope

The geographic boundary for cumulative cultural resources impacts is General Plan buildout.
This boundary is selected because urban development typically involves surface and subsurface
disturbance activities such as grading, trenching, and excavations. These activities generally have
a higher potential to impact historical resources and/or unique archaeological resources than do
common agricultural practices wherein subsurface disturbance is generally not a significant
component of agricultural production activities.

With the exception of the approved, but unconstructed Butterfly Village project located in
unincorporated Monterey County north of the City, no other urban development is planned in
unincorporated areas located in the immediate vicinity of the City (Carl Holm, phone
conversation, February 8, 2017). Therefore, expanding the cumulative development boundary
outside of the City would not be more notably more representative of cumulative conditions that
affect cultural resources. Further, historical resources within the City are unique to its historic
context.
Cumulative Impacts

The General Plan EIR identified that potential impacts on known historical resources within the planning area could be significant and unavoidable. Impacts on archaeological resources and paleontological resources would be less than significant with implementation of General Plan policies.

Past and present development within the City has resulted in the demolition and alteration of significant historical resources and likely the loss of or damage to unique archaeological resources. Much of the cumulative development likely took place prior to implementation of protections for cultural resources established through California planning law, the California Government Code and Public Resources Code, and other state and federal regulatory measures. Such development has likely impacted known and unknown historic and archaeological resources. Future development within the City’s SOI may also have potential to damage or alter significant historical and/or unique archaeological resources; however, because much of the vacant land within the SOI is in agricultural production, the incremental contribution of such development to the cumulative impact could be minimal. Nevertheless, due to the impacts of past and present development within the City on historical resources and/or unique archaeological resources, the cumulative impact is considered to be significant.

Standard mitigation measures for cultural resources protection are included in CEQA documentation for individual projects pursuant to General Plan policy COS-12, and mitigation measure CR2 in the General Plan EIR implements policy COS-12. These are designed to avoid or substantially lessen the contribution of specific projects to cumulative impacts on cultural resources.

Project Contribution to Cumulative Impacts

Project impacts on cultural resources are evaluated in Section 3.6, Cultural Resources in this EIR. No historical or unique archaeological resources are known to exist within the Target Areas. Nevertheless, it is possible that future development within these areas could impact such resources if present. Mitigation measure CR-1 in this EIR requires individual project developers to conduct historic resources surveys to identify and mitigate for potential historical resources if any are identified. The proposed project also has potential to result in significant impacts to unique archaeological resources. Mitigation measures CR-2 and CR-3 require archaeological resources surveys and imposition of conditions to protect resources if they are identified and/or uncovered during construction. Potential impacts on paleontological resources are identified and mitigated to less than significant through mitigation measure CR-4 in this EIR.
Implementation of mitigation measures CR-1 to CR-4 would reduce project impacts on cultural resources and paleontological resources to less than significant. With these mitigations in place, the proposed project is not anticipated to have cumulatively considerable impacts on historical resources or unique archaeological resources.

**Geology and Soils**

As described in Section 3.7, Geology and Soils, the California Supreme Court recently held in the 2015 “California Building Industry Association (CBIA)” case that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents. Prior to the CBIA case, CEQA analyses of potential geology and soils impacts of a project typically focused on existing geologic hazards that have potential to cause risk to public health and safety. While Section 3.7 and the cumulative impact discussion below include these analyses, they are included only for informational purposes and the information is to be considered outside the purview of CEQA. However, a specific project may result in significant impacts related to geologic hazards if it has potential to exacerbate an existing geologic hazard.

**Geographic Scope**

The geographic context for the analysis of cumulative geologic hazard impacts generally is site specific because each project site has a different set of geologic considerations and development of specific sites would be subject to uniform site development and construction standards as a means to address site-specific hazards.

**Cumulative Impacts**

Past cumulative development in the City and future development including the proposed project would increase the number of people and structures that could be exposed to hazards associated with seismic activity, primarily ground shaking and potentially liquefaction, as well as hazards that include landslides, expansive soils, and unstable geologic units. Future probable cumulative development will increase exposure to geologic hazards by introducing significant new development and population. Though future probable development will be subject to regulatory requirements that reduce its contribution to cumulative exposure to geologic hazards, the cumulative impact from exposure to geologic hazards is nevertheless considered to be significant.
Project Contribution to Cumulative Impacts

Existing geologic hazards that have potential to affect new development within the Target Areas include seismic shaking, seismic-shaking related ground failure including liquefaction, and landslides. The proposed project could result in cumulatively considerable impacts if it were to exacerbate these hazards, and by doing so, worsen exposure of structures and people to risks from such hazards. Seismic shaking, liquefaction, and expansive soils are natural phenomena; new development does not have potential to exacerbate these hazards. Further, as described in Regulatory Setting subsection of Section 3.7, Geology and Soils, new development within the Target Areas must comply with a range of General Plan policies and state and local regulations designed to reduce exposure of structures and people to geologic hazards and to avoid exacerbation of existing geologic hazards, such as landslides. Given these considerations, the proposed project is not anticipated to have cumulatively considerable geologic or soils impacts.

Hazards and Hazardous Materials

Geographic Scope

The geographic scope for cumulative hazardous materials conditions is General Plan buildout. The primary hazardous materials issues of concern for the proposed project are site specific - the potential to create health risks to a significant number of construction workers and to the public from exposure to agricultural chemicals that may have accumulated in site soils over time and to aerially deposited lead in soils along the margin of U.S. Highway 101. These potential risks result from site preparation and construction activities for individual projects that could cause such chemicals to be released as soils are graded, trenched, and excavated. Relative to common agricultural activities on unincorporated land surrounding the City, site preparation and construction activities associated with urban development can result in substantial displacement and manipulation of soils that can exacerbate the noted risks. Therefore, the geographic scope for cumulative impacts was limited to the City, where urban development has occurred over time and where additional urban development on land within the SOI that is currently in agricultural use is projected consistent with direction in the General Plan.

Cumulative Impacts

Past and present development within the City has contributed to increased risks to public health and safety related to existing hazardous materials conditions and has created new hazardous materials risks through increased transport, use, storage and disposal of hazardous materials. The General Plan EIR identified that related impacts of future development within the City, including exposure of people and property to hazardous materials conditions (which include...
conditions such as exposure to agricultural chemical residues and aerially deposited lead), and generation, transport, and storage of hazardous materials by existing and probable new development are potentially significant, but would be reduced to less than significant with implementation of mitigation measures, all of which call for implementation of General Plan policies and programs. Nevertheless, a significant amount of cumulative development took place in the City before current regulatory protections were in place to minimize hazardous materials conditions. Therefore, the cumulative hazards to public health and safety and to environmental resources from such development are assumed to be cumulatively significant.

**Project Contribution to Cumulative Impacts**

Proposed project impacts related to hazards and hazardous materials are described in Section 3.8, Hazards and Hazardous Materials of this EIR. Buildout of the Target Areas would have several related potential impacts, including exposure of people and structures to existing hazardous materials conditions and creation of new hazardous materials conditions. These impacts are reduced to less than significant through conformance with federal and state laws and regulations and through implementation of mitigation measures. Mitigation measure HAZ-1 requires preparation of Phase I environmental site assessments for future development within the Target Areas to identify and mitigate hazardous soils conditions if found to be present. Mitigation measures HAZ-2 and HAZ-3 require analysis for and mitigation of hazards associated with aerially deposited lead. Through the required conformance of the proposed project with federal and state laws and regulations and the noted mitigation measures, the project contribution to cumulative impacts would be less than considerable.

**Hydrology and Water Quality**

**Geographic Scope**

**Water Quality.** The geographic boundary for cumulative hydrology and water quality impacts is General Plan buildout plus agricultural production activity within the County in the vicinity of the City. Agricultural production in the County is included in this scenario due to its demonstrated adverse impacts on water quality resulting from discharge of agricultural chemicals to surface water.

**Flood Hazards.** The geographic scope for flood hazard conditions is General Plan buildout. This scenario is selected because conversion of agricultural land to urban development within the City significantly changes surface hydrological conditions with potential to affect flood hazard conditions; past, present and future continued agricultural uses adjacent to the City do not have this potential.
Cumulative Impacts

Water Quality. Past and existing cumulative development within the City has contributed to significant cumulative surface and groundwater quality impacts during construction and during operations in a variety of ways, most notably through erosion of soils exposed during site preparation/construction processes and subsequent sedimentation of surface water bodies, release of urban pollutants such as oils or hazardous materials stored in underground storage tanks or elsewhere, and release of urban pollutants to surface water contained in stormwater discharged from developed project sites, roadways, etc. As discussed in Section 3.9, Hydrology and Water Quality, past and existing agricultural practices in the vicinity of the City and throughout the Salinas Valley have contributed to water quality degradation through use of fertilizers, pesticides, and other agricultural chemicals. In many cases, water quality standards have been violated with the effect that water quality in surface water bodies in the vicinity is considered impaired. Probable future development within the City as planned in the General Plan has potential to exacerbate existing water quality impacts or create new water quality impacts. However, with increasingly stringent water quality protections with which new development must conform (e.g. the City’s SWDS), future development is likely to have reduced potential for contributing to water quality degradation relative to past and existing development. Continued agricultural production in the vicinity of the City and beyond will exacerbate water quality degradation. Given the degraded quality of surface water bodies within the City and within unincorporated Monterey County in the vicinity of the City, cumulative water quality impacts are considered to be significant.

Flood Hazards. Past and current cumulative urban development within the City has contributed to flood hazard conditions within the City and adjacent portions of the County by increasing the volume and rate of storm water runoff from developed sites relative to undeveloped land conditions. This development is considered to have cumulatively significant impacts on flood hazard conditions. As described in Section 3.9, the City’s SWDS have been in effect since 2010. Recent development within the City that has been subject to SWDS requirements has a substantially reduced potential to contribute to cumulative flood hazard conditions, as under these regulations, storm water runoff from individual sites must not exceed pre-existing volumes or rates. These same projects also have a reduced potential to limit groundwater recharge, as storm water runoff is to be treated and retained on site through a range of best management practices (including LID features) that promote groundwater recharge. Nevertheless, in total, cumulative development is considered to have had a significant cumulative flood hazard impact.

Project Contribution to Cumulative Impacts

Water Quality. The hydrology and water quality impacts of the proposed project are discussed in Section 3.9, Hydrology and Water Quality. Potential erosion and surface and groundwater
quality impacts are less than significant with required conformance to the City’s NPDES permit as implemented through its SWDS and implementation of a SWPPP. Similarly, impacts from loss of groundwater recharge potential are less than significant given storm water management requirements that promote recharge and other site specific recharge opportunities. With conversion of agricultural land to urban use, use of agricultural chemicals now applied to the majority of the 558 acres of agricultural land included in the Target Areas would be eliminated. This would have an incremental positive impact on water quality.

**Flooding.** Potential impacts from localized flooding are less than significant with required conformance to City General Plan policies, Zoning Code standards, and SWDS regarding provision of storm drainage infrastructure improvements. Flood hazards that could affect future development within Target Areas V and F would be reduced to less than significant through conformance of future development with the Salinas Municipal Code flood management regulations.

While it is possible that the proposed project would incrementally exacerbate existing and projected cumulative impacts, with conformance to the uniform development regulations and policies noted above, the proposed project’s cumulative impacts would be less than cumulatively considerable.

**Noise**

**Geographic Scope**

The geographic scope for cumulative traffic noise impacts is the road network under the jurisdiction of the City of Salinas, as well as traffic generated within the counties of Monterey, Santa Cruz, and San Benito, which affects regional roads onto which project-generated traffic would be distributed. These circulation facilities are included in City of Salinas’s Travel Demand Model. The Travel Demand Model is an augmented version of the AMBAG Regional Travel Demand Model. AMBAG’s model covers Santa Cruz, Monterey and San Benito counties. To create the City’s model, additional details within the City regarding both land use projections and future roadway network improvements were added to the AMBAG regional model. The model includes assumptions about cumulative development and increases in traffic volumes throughout the City and greater Monterey Bay area. The traffic generation and distribution information from the City’s model is an input to the noise model used to estimate changes in traffic noise resulting from addition of project traffic to the road network and to estimate exposure of development within the Target Areas to cumulative traffic noise.

The geographic scope for cumulative stationary noise source impacts is General Plan buildout. This scope is applicable because stationary source impacts are typically associated with
stationary noise sources from equipment used in urban development projects. Such impacts generally are localized and arise from conflicts with noise sensitive uses associated with urban development (e.g. residential development, schools, churches, etc.).

Cumulative Impacts

Past and present development within Salinas, the vicinity, and the region has contributed to increased ambient noise levels. Permanent noise increases have occurred in large part from development of projects that include stationary noise sources and as a result of increases in traffic volumes on local and regional roadways. With increasing noise levels, past and existing noise sensitive land uses such as residences and schools have been and will continue to be exposed to stationary source noise and traffic noise that exceeds the City's noise exposure standards. Probable future development within the City, vicinity, and region will exacerbate traffic noise impacts over time by contributing traffic to local and regional roadways. Stationary noise source and traffic noise impacts are considered to be cumulatively significant.

The General Plan EIR identified that impacts from increases in traffic noise would be significant and unavoidable. However, impacts from stationary noise sources on sensitive receptors would be less than significant with conformance with General Plan policies.

Project Contribution to Cumulative Impacts

Traffic Noise Effects. Project noise impacts are described in Section 3.10, Noise. Under cumulative development conditions with buildout of the proposed project, the proposed project would add significant traffic volumes to the local road network. Cumulative traffic volumes include trips generated in the County, region, and state that pass through Salinas. These trips are included in the traffic model used to assess traffic impacts as discussed in Section 3.12, Transportation. The traffic volumes are used as an input to the noise model; therefore, the noise analysis for the proposed project reflects cumulative traffic noise conditions.

Significant impacts on existing and future noise sensitive uses located along two existing roadways onto which the proposed project would contribute traffic are projected. These represent the proposed project’s contribution to cumulative traffic noise impacts. While noise analyses would be required of future individual projects to assess their contribution to this effect (per General Plan implementation program N-1), there is no assurance that measures to reduce impacts will be feasible. Therefore, the project contribution to this impact is considered to be cumulatively considerable and cumulatively significant and unavoidable.

Noise volumes from cumulative traffic noise on local roadways, including traffic from the proposed project, would exceed General Plan noise exposure thresholds in portions of each of the proposed Target Areas. This change represents the proposed project’s contribution to
impacts related to inconsistency with General Plan noise/land use compatibility policies. Mitigation measure N-1 requires that noise analyses be prepared for projects planned within affected portions of each Target Area and that the projects be designed to ensure consistency with the noise exposure standards. This would ensure that the proposed project’s contribution to cumulative noise/land use incompatibility impacts would be less than cumulatively considerable.

**Stationary Noise Effects.** Future individual projects could include stationary sources of noise with potential to adversely affect adjacent noise sensitive uses. It is unlikely that these stationary noise sources (e.g. backup generators, rooftop equipment, etc.) will combine with existing or future off-site stationary noise sources to significantly impact off-site common noise sensitive uses. Regardless, the contribution of the proposed project to cumulative stationary source impacts would be reduced to less than considerable through conformance with General Plan policy that requires analysis of such sources and mitigation of potential impacts.

**Transportation**

**Geographic Scope**

The cumulative development scenario for transportation impacts is cumulative development that generates and distributes traffic onto roadways included in latest version of the City of Salinas’ Travel Demand Model. The City’s Travel Demand Model is an augmented version of the AMBAG Regional Travel Demand Model. AMBAG’s model covers the three-county region of Santa Cruz, Monterey and San Benito counties. To create the City’s model, additional details within the City regarding both land use projections and future roadway network improvements were added to the AMBAG regional model. The City’s model also includes a more robust (granular) set of Traffic Analysis Zone’s (TAZ) in order to better forecast traffic conditions within the City’s area of influence. Both models use TransCAD software, which is an industry standard tool for this purpose used by metropolitan planning organizations, cities, counties and states to project future transportation conditions. The City’s model includes all of the approved and reasonably foreseeable growth anticipated in Monterey Bay area by the year 2045 with base year 2010.

**Cumulative Impacts**

Past and present development within the City and within the tri-County area that includes Monterey, Santa Cruz, and San Benito counties has resulted in traffic generation that has significantly impacted the performance of many circulation facilities within these jurisdictions and on facilities within Caltrans’ jurisdiction. Future development within these jurisdictions as
may be permitted per their respective general plans will generate additional traffic that likely will cause circulation congestion to increase to levels that exceed the roadway performance standards of the respective jurisdictions and Caltrans. Despite the efforts of the jurisdictions and Caltrans to mitigate traffic impacts of development through individual project mitigations, programs to mitigate cumulative traffic impacts, and policies aimed at reducing traffic impacts, cumulative impacts are considered to be significant and unavoidable.

**Project Contribution to Cumulative Impacts**

The analysis in Section 3.12, Transportation, identifies the traffic volumes that would be generated by and added to the affected road network under long-term development conditions. As described in Section 3.12, the impacts of the proposed as assessed in the year 2045 with the City’s traffic model. The traffic model considers future growth within the tri-county area and the City that is projected to occur to that time horizon. Therefore, the assessment serves as a cumulative impact analysis. Impacts on the performance of the affected road network would be reduced to less than significant except on the following County- and Caltrans-controlled road segments:

- Alisal Road between E. Alisal Street and Hartnell Road (County)
- Crazy Horse Canyon Road south of U.S. Highway 101 (County)
- Espinoza Road west of U.S. Highway 101 (Partial/Both)
- Harris Road west of Abbott Street (County portion outside the city limits)
- San Juan Grade Road between Hebert Road and Crazy Horse Canyon Road (County)
- Castroville Road (SR 183) between Espinosa Road and SR 156 (Caltrans)
- U.S. Highway 101 between John Street (SR 68) and Market Street (Caltrans)
- U.S. Highway 101 between Main Street (SR 183) and Laurel Drive (Caltrans)
- U.S. Highway 101 between Laurel Street and Boronda Road (Caltrans)
- U.S. Highway 101 between Market Street and Main Street (SR 183) (Caltrans)

The impacts on these road segments are cumulatively considerable and cumulatively significant and unavoidable.
4.0 Cumulative Impacts

Wastewater

Geographic Scope

The geographic boundary for cumulative wastewater impacts is development within the wastewater collection and treatment service area of the Monterey One Water and for industrial wastewater, development within the wastewater collection and treatment service area of the City’s industrial wastewater treatment facility. The Monterey One Water service area includes: the cities of Pacific Grove, Monterey, Seaside, Del Rey Oaks, Marina, Salinas, and Castroville; Moss Landing (within unincorporated Monterey County); and farmlands in the Castroville area that received recycled water produced by Monterey One Water.

Cumulative Impacts

Past and present cumulative development within the two respective service areas has contributed to reduced available treatment capacity at the Monterey One Water’s regional treatment plant and the City’s industrial wastewater treatment facility. Were the cumulative treatment demands at either facility to exceed their respective treatment capacities, expansion of one or both facilities or construction of new facilities would be required. Construction and operation of expanded facilities could have potential to cause significant environmental impacts. Under cumulative conditions, neither facility requires expansion, as treatment capacities are not being or projected to be exceeded. Thus, no cumulatively significant wastewater-related impacts are anticipated.

Project Contribution to Cumulative Impacts

The contribution of the proposed project to projected cumulative wastewater treatment demand and to projected treatment capacity at both of the treatment facilities is discussed in Section 3.13, Wastewater. The incremental increases in demand for wastewater treatment capacity would not result in either facility exceeding its design capacity; therefore, the proposed project’s contribution to cumulative treatment demand, including demand from projected future cumulative development, would be relatively minor. Improvements to the City’s industrial wastewater treatment facility and to a key collection and pumping facility, the Salinas Pump Station, have already been made as described in Section 3.13. Because the proposed project’s contribution to increased demand for wastewater collection and treatment capacity would be less than considerable and would not trigger the need to construct new facilities, the proposed project would not contribute to environmental impacts that may otherwise occur from construction and operation of expanded facilities. The proposed project would have no related cumulative impacts.
Water Supply

Geographic Scope

The geographic boundary for cumulative water supply impacts is development within the boundary of the Salinas Valley Groundwater Basin.

Cumulative Impacts

As described in Section 3.14, Water Supply, water demand from past and present development and from agricultural production activities within the boundary of the groundwater basin has contributed to groundwater overdraft conditions - a significant cumulative impact. Future urban development within the groundwater basin has potential to exacerbate overdraft conditions. However, where new urban development occurs on land in active agricultural use, the potential exists for urban uses to reduce demand for groundwater relative to agricultural uses, as urban uses often demand less water than is required for agricultural irrigation.

In addition to existing agricultural irrigation having contributed to groundwater overdraft, recent trends in the conversion of previously uncultivated land (e.g. range land and open space uses) to cultivated uses in Monterey County indicate that irrigation groundwater demand could be increasing. As described in Section 3.14, Water Supply, data from the California Department of Conservation’s Farmland Mapping and Monitoring Program shows that from 2010-2012, approximately 376 acres of agricultural land in Monterey County was converted to urban use. However, during the same period, nearly ten times that amount of land that was previously in other uses (e.g. range land, open space, etc.) was converted to agricultural use. During the 2012-2014 period, the acreage of land converted to agricultural use declined. It is possible that demand for groundwater has increased along with increased agricultural activity and that the increase is exacerbating groundwater overdraft conditions.

Project Contribution to Cumulative Impacts

The proposed project would convert actively cultivated agricultural land to urban use. The net result is a projected net increase of 556 acre-feet per year of groundwater in storage. That is, the proposed project would result in significantly less demand for groundwater than the demand agricultural operations located within the Target Areas. Though the proposed project represents a long-term commitment to continued use of groundwater supply, it would have a net beneficial cumulative effect reducing the magnitude of groundwater overdraft now occurring within the groundwater basin. A net beneficial effect, of course, is not cumulatively considerable.
4.0 Cumulative Impacts

As described in the Regulatory Setting in Section 3.14, Water Supply, pursuant to the Sustainable Groundwater Management Act, by approximately 2040, conditions within the groundwater basin must be managed to ensure that the groundwater supply is stable. As such, by that time, overdraft conditions from cumulative demands on groundwater will have been addressed.
5.0 Other CEQA Topics

This section contains as summary of the significant unavoidable impacts of the proposed project, its potential growth-inducing impacts, and the significant irreversible environmental changes that could result from future development as proposed. The discussion of each of these issues is preceded by the CEQA requirements for the scope of analysis to be conducted for each topic. Energy demand effects of the proposed project and measures related to energy conservation are also discussed, as is an evaluation of its potential economic/urban decay effects.

5.1 Significant Unavoidable Impacts

CEQA Requirements

A significant adverse unavoidable environmental impact is a significant adverse impact that cannot be reduced to a less-than-significant level through the implementation of mitigation measures. CEQA Guidelines Section 15093(a) requires an agency’s decision-making body to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable environmental risks when determining whether to approve the project. If the decision-making body concludes, based on substantial evidence, that specific economic, legal, social, technological, or other benefits of a project outweigh the project’s significant unavoidable environmental effects, the adverse environmental effects may be considered “acceptable.” CEQA Guidelines Section 15093(b) states that when the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
**Significant and Unavoidable Impacts of the Proposed Project**

Significant unavoidable impacts of the proposed project are identified in the analysis of individual environmental topics in Section 3.0 and in the discussion of cumulative impacts in Section 4.0, Cumulative Impacts. The following is a summary list of significant and unavoidable impacts as identified in those two sections:

- Substantial change in visual character due to conversion of agricultural land to urban use and loss of important existing views of valuable visual resources in the form of agricultural landscapes and potentially of more distant mountain views;

- Conversion of 502 acres of Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) to non-agricultural use;

- Generation of a significant volume of greenhouse gas emissions;

- Generation of traffic noise that exceeds standards;

- Reduction of levels of service on the following County and Caltrans road segments to below acceptable standards:
  - Alisal Road between E. Alisal Street and Hartnell Road (County)
  - Crazy Horse Canyon Road south of U.S. Highway 101 (County)
  - Espinoza Road west of U.S. Highway 101 (Partial/Both)
  - Harris Road west of Abbott Street (County portion outside the city limits)
  - San Juan Grade Road between Hebert Road and Crazy Horse Canyon Road (County)
  - Castroville Road (SR 183) between Espinosa Road and SR 156 (Caltrans)

The impacts listed above also represent cumulatively significant and unavoidable impacts of the proposed project as discussed in Section 4.0, Cumulative Impacts. The visual resource impact is cumulatively considerable given the large number of acres of scenically valuable farmland that would be lost to urban use and the high frequency by which the perception of visual change will be noticeable (e.g. from U.S. Highway 101). The farmland impact is cumulatively considerable in light of conversion of farmland throughout the county. The greenhouse gas emissions impact is cumulatively considerable in the context of statewide and global conditions. The traffic noise impact is cumulative considerable given traffic volumes in the year 2045 are used as an input to the analysis. The transportation impacts are cumulatively considerable given that the model used to identify the impacts considers traffic volumes within the City and tri-county area projected to occur in 2045.
5.2 Growth Inducing Impacts

CEQA Requirements

As required by Section 15126.2(d) of the CEQA Guidelines, an EIR must discuss ways in which a proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. Although growth inducement itself is not considered an environmental effect, it could potentially lead to adverse environmental effects.

A project may foster economic or population growth through:

- Creating economic expansion (e.g., changes in revenue base or employment expansion, etc.). Economic expansion effects can include those resulting from the “multiplier effect.” A “multiplier” is an economic term used to describe inter-relationships among various sectors of the economy. The multiplier effect relates to the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect includes the notion that the on-site, direct employment and population growth resulting from a project is not the complete picture of the growth it has potential to create;

- Removing an impediment to growth, examples of which include changing zoning or general plan designations to enable a greater level of development than was previously foreseen, expanding the capacity of infrastructure beyond that needed to serve a specific project such that the barriers for additional growth are reduced, or establishing an essential public service that previously did not exist and which is necessary to support additional growth; or

- Providing new housing that accommodates additional population growth.

The General Plan EIR examines the effects of projected growth in the City, including economic growth, based on the land uses and development densities included in the 2002 General Plan. The proposed project was not contemplated at the time the General Plan was adopted. Therefore, the proposed project is growth inducing. The environmental impacts of the anticipated growth are evaluated in other sections of this EIR.
**Economic Growth Inducement**

The primary objective of proposed project is to foster economic growth in the form of new retail, industrial, and business park development. The purpose is to generate jobs to meet the employment needs of the City’s growing population through General Plan buildout. By design, the proposed project is economically growth inducing in that it could enable development of over 5,200,000 square feet of new building development needed to generate new employment. This new development capacity is projected to provide potential for nearly 9,000 jobs. The environmental impacts resulting from the direct economic growth-inducing effects of the proposed project are evaluated in other sections of this EIR.

It is likely that revenues generated by new development and portions of the incomes received by new employees will be fed back into the local economy. The increased investment in the local economy could in turn have a multiplier effect that indirectly causes business and population growth beyond the boundaries of the Target Areas. The magnitude of this effect, and the types of and locations where new growth could occur as a result are unknown. Consequently, it would be speculative to project the potential environmental effects of indirect population and business growth.

**Removing Impediments to Growth**

**Removing Land Use and Planning Impediments to Growth**

The environmental impacts of the proposed project derive from the physical changes that would be created with development of new retail, industrial, and business park development within the Target Areas. None of these effects have been previously contemplated by the City. The first step in making this additional development possible is the City’s amendment of the General Plan to include the Target Areas. Development of the Target Areas would not be possible unless and until the City requests LAFCO to approve one or more sphere of influence (SOI) amendments and one or more annexations to incorporate the Target Areas into the City. From a land use perspective, these latter approvals would remove a current impediment to urban growth which owes to the fact that the City does not currently have land use control over land within the Target Areas.

This EIR examines the environmental impacts of buildout of the Target Areas, as this is the only new development capacity that can foreseeably be attributed to the proposed project. Development of the Target Areas would provide new land capacity for employment-generating uses that in total, meet a substantial percentage of the total additional employment needs of the City through General Plan buildout. However, as discussed in Section 2.0, Project Description, additional new employment generation is expected to result from economic development on infill parcels within the City. This additional employment generating potential is assumed to be
sufficient to meet the balance of new employment generation needed through General Plan buildout that cannot be met from employment-generating development outside the city limits but within the SOI and within the Target Areas. Such development is already planned as part of the General Plan and the environmental impacts of that development were evaluated in the General Plan EIR at a program level. The same is true of projected development outside the city limits but within the SOI.

With the exception of new development capacity within Target Area V, the proposed project does not directly increase development capacity within the City. However, a range of policies and actions in the EDE could, based on future actions of the City to implement several of these policies, indirectly result in consideration to intensify development in a limited number of locations to a level not currently contemplated in the General Plan. Other policies and actions call for catalyzing development as already contemplated in the General Plan and/or catalyzing development as contemplated in subsequent plans prepared by the City to implement the General Plan. Similarly, depending on how these policies are implemented by the City, they too could result in new development capacity that has not already been contemplated in the General Plan. Examples of these policies and actions include:

Action LU-1.1.4 – Facilitate advancement of entitlements (for priority Economic Opportunity Areas) through preparation of specific plans, area plans or other planning efforts, engineering analyses, or other technical analyses to potentially reduce development review processing time and costs, if appropriate funding support from partners is available.

Action LU-1.2.1 – Modify the boundaries of the Focused Growth Overlay Areas as determined appropriate by the City to generally be consistent with the boundaries of the applicable Economic Opportunity Area (O, S, R, U, and X) to promote economic development priorities and infill development.

Action LU-1.2.2 – Develop corridor plans (or other plans as applicable) and an intensification strategy for each Focused Growth Overlay Area as determined by the City, with emphasis on solving parcel assembly and parking issues to maximize efficiency of development, as well as derivation of gap funding resources in-lieu of redevelopment funding. Update existing Focused Growth Overlay District regulations to adopt infill and corridor intensification standards, as needed, that include incentives such as streamlining entitlement and environmental review processes, and fee deferrals, as appropriate.
Action LU-1.3.5 – Create and implement a vision and plan for West Market Street (Economic Opportunity Area W) from the rail station to Davis Road, that is triggered by the Transit Oriented Development Rail Plan and the potential for mixed-use infill, reuse of buildings, and a revitalized corridor. Encourage large employers and employment centers to locate in areas conducive to transit use and other alternative transportation modes, particularly along existing or planned high-capacity regional transit corridors and regional bicycle corridors.

Action LU-1.3.6 – Create and implement a vision and plan to promote redevelopment of the South Abbott Street Area (Economic Opportunity Area Y) for agricultural industrial and related uses.

Action LU-1.3.10 – Revise the Zoning Code as needed to further promote and encourage the expansion of medical and related uses in Economic Opportunity Area X.

Policy ED-LU-1.4 – Create and implement a vision and plan and encourage development for the Carr Lake area (Economic Opportunity Area V), and the areas within the Carr Lake vicinity, as the “Sports Capitol of the Central Coast” which serves as a recreational/sports/cultural/commercial “centerpiece” for the community that unites and connects all segments of Salinas to the east, north, downtown, and south with a “park centered” design. Focus on development of retail, additional sports complexes, development of joint-use agreements for use of schools and the Constitution Boulevard regional soccer complex as sports venues, and collaboration with foundations and the private sector, while maintaining Carr Lake's function as a reclamation/flood control facility.

Action C-2.10.4 – If deemed feasible and appropriate, prepare a specific project plan for site acquisition, development, and operation of an intermodal freight facility.

The extent to which implementation of these policies and actions could foreseeably result in new development capacity not already contemplated in the General Plan is considered speculative. Whether or not this outcome occurs will be contingent on how the policies are implemented by the City. Any future project or plan proposed to implement these policies and actions which results in intensification of development will be subject to CEQA review and discretionary action by the City. Nevertheless, for disclosure purposes, the following environmental impacts
are representative of effects that could be identified in future CEQA documents prepared for future projects or plans that result in new infill development capacity:

- Convert agricultural land to non-agricultural use (Carr Lake area only and only if in addition to impacts already identified in this EIR);
- Conflict with Williamson Act zoning (Carr Lake area only and only if in addition to impacts already identified in this EIR);
- Produce criteria air emissions that could exceed thresholds of significance identified by the air district or conflict with air district air quality plans;
- Generate air pollutants that have potential to adversely affect sensitive receptors;
- Impact special-status plant or wildlife species or their habitat, riparian habitat, and/or wetlands;
- Modify, damage, or destroy historical resources, unique archaeological resources, or paleontological resources;
- Generate new GHGs that contribute to global warming;
- Degrade surface water quality or groundwater quality;
- Contribute to flood hazards and/or expose people or structures to flood hazards;
- Create inconsistencies with the General Plan or Municipal Code;
- Expose people to temporary or permanent increases in noise from construction, stationary sources or traffic, and/or expose people to noise from Salinas Municipal Airport operations;
- Generate traffic that causes a decrease in the performance of the City, County, and/or regional highway (Caltrans') road network; or provide insufficient transit, bicycle, and/or pedestrian facilities;
- Increase demand for water that could incrementally exacerbate groundwater overdraft conditions within the Salinas Valley Groundwater Basin; or
- Result in cumulatively considerable impacts relating to the above-listed or other environmental effects.
5.0 Other CEQA Topics

**Removing Infrastructure/Services Capacity Impediments to Growth**

The proposed project would facilitate the City’s future ability to control land use on lands that are currently outside its SOI. The sole purpose is to provide for additional employment-generating development to help meet the long-term demand for employment through General Plan buildout. The additional land capacity within Target Areas N, L2, K, F, and B is limited to that needed solely for this purpose. Public infrastructure, including water supply mains, wastewater and storm drainage collection/conveyance facilities, dry utilities, etc., would be extended to these Target Areas from adjacent developed areas within the City. However, the utilities would not be sized to accommodate more than the development proposed within each of the respective Target Areas. These types of infrastructure improvements are not expected to be growth inducing.

At the time one or more of the Target Areas is proposed for annexation, LAFCO is likely to require the City to assess the fiscal effects of annexation. Given the types of development planned within the Target Areas, it is probable that such development will have net economic benefit to the City by generating a positive net fiscal surplus. The additional funds would be available to support City services and functions. The extent to which the revenue surplus could trigger growth in the form of expansion of City facilities or services that may result in environmental effects is speculative at this time. To the extent that the City undertakes new capital facilities projects, the environmental effects of those projects would be evaluated in the CEQA documentation prepared for the individual projects.

**Population Growth Inducement**

The proposed project does not include new land capacity for residential development. Therefore, it would not be a source of direct population growth.

It is unknown what percentage of the job opportunities created by the proposed project will be filled by residents residing in the City, vicinity, region, or beyond. If a significant number of new jobs are filled by employees who do not live within commuting distance of the City, it is possible that the local population would grow as these employees relocate to the area. An incremental increase in demand for housing could also result. The City has traditionally had an unemployment rate that exceeds the California average. This is in part due to the seasonal nature of employment within the agricultural sector in which a significant number of residents are employed. This is also due in part to insufficient employment opportunities in the City and to a mismatch between the skills sought by employers and the skills of unemployed residents, as well as other factors. Given the purpose of the proposed project, it is assumed that the City will endeavor to attract new job-generating businesses whose employment needs match the skills and
qualifications of the City’s workforce. To the extent this can be done, and to the extent that non-
City residents living within commuting distance of the City fill new job vacancies, population
growth and demand for new housing would be reduced.

This issue must also be viewed in light of the City’s current and future land capacity for new
housing development. The City does have significant vacant land capacity for new residential
development. That capacity is largely represented by the north of Boronda Future Growth Area
in which capacity for over 14,000 new dwelling units is projected. Buildout of other vacant or
underdeveloped residential land in the City would yield potential for thousands of additional
dwelling units based on existing General Plan land use designations that permit residential
development and on zoning standards that implement these land use designations.

It would be speculative to conclude that the proposed project will indirectly create new demand
for housing that cannot be met by the City’s existing/future new housing capacity or
existing/future supply available in surrounding communities within commuting distance. In any
case, if construction of an incremental additional number of new housing units were to be
partially and indirectly driven by demand resulting from the proposed project, the environmental
effects of such projects would be evaluated as part of their project-specific CEQA
documentation.

5.3 Significant Irreversible Environmental Changes

CEQA Requirements

CEQA Guidelines section 15127 requires irreversible changes be addressed in an EIR when
prepared in connection with, among other activities, the adoption, amendment, or enactment of
a plan, policy, or ordinance of a public agency. The proposed project is a general plan
amendment and therefore, significant irreversible environmental changes are defined and
discussed in this section.

CEQA Guidelines section 15126.2(c) addresses significant irreversible environmental changes
which would be caused by the proposed project. The use of non-renewable resources during the
initial and continued phases of the project may be irreversible, since a large commitment of such
resources makes removal or nonuse in the future unlikely. Primary impacts and, particularly,
secondary impacts (such as a highway improvement that provides access to a previously
inaccessible area) generally commit future generations to similar uses. Also, irreversible
environmental damage can result from accidents related to hazardous materials or hazardous
materials conditions associated with the project. Irretrievable commitments of resources should
be evaluated to assure that such current consumption is justified.
**Significant Irreversible Environmental Impacts**

The proposed project could result in construction up to 5,255,959 square feet of buildings, new circulation infrastructure, and utility infrastructure needed to support the new development. Approximately 710 acres (558 acres contained within the Target Areas and approximately 152 acres within new roadways) of largely undeveloped agricultural land could be irreversibly committed to these new urban uses. Construction and operation of new urban development will require irreversible commitment of nonrenewable resources. Additional irreversible environmental changes are summarized below.

**Change in Land Use Pattern**

The proposed project could result in development of urban land uses and an expanded urban land use pattern that would not likely to be further altered in the foreseeable future. The arrangement of roads, infrastructure, and developed land uses would be irreversible changes.

**Commitment of Natural Resources and Energy**

Future development of the Target Areas and expressways could result in the irreversible commitment of construction materials and non-renewable energy resources, depending upon technological advances that may occur before the Target Areas and expressways are developed. Non-renewable and slowly renewable construction materials may include, but are not limited to, the following: lumber and other forest products; sand and gravel; asphalt; petrochemical construction materials; steel; copper; lead and other metals; and water. Energy, fossil fuels, oils, and natural gas would be irreversibly committed during construction. These same resources would be used for vehicles and heating/cooling equipment during operations. The continued use of these resources associated with project operations represents a potential long-term obligation. The energy consumed in developing and maintaining new development for urban use may be considered a permanent investment. The commitment of resources required for the construction and operation of the project would limit the availability of such resources for future generations or for other uses.

**Commitment of Groundwater to Urban Uses**

The proposed project would commit the water purveyor, Cal Water, to long-term delivery of groundwater to support the future urban uses. While the conversion of agricultural uses to urban use would have a net positive effect on groundwater in storage, the commitment of groundwater supply to urban use is considered to be an irreversible change.
5.4 Energy Conservation

CEQA Background

Public Resources Code section 21100 (b)(3) requires that an environmental impact report include a detailed statement setting forth mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. This formulation is echoed in CEQA Guidelines section 15126.4 (a)(1), which states that “[a] EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy.” This section adds that “Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant. Examples of energy conservation measures are provided in Appendix F.”

Appendix F to the CEQA Guidelines is entitled, “Energy Conservation.” As amended in early 2010, it begins by stating that “[t]he goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

1. decreasing overall per capita energy consumption,

2. decreasing reliance on fossil fuels such as coal, natural gas and oil, and

3. increasing reliance on renewable energy sources.”

Appendix F goes on to provide a “list of energy impact possibilities and potential conservation measures is designed to assist in the preparation of an EIR. In many instances specific items may not apply or additional items may be needed. Where items listed below are applicable or relevant to the project, they should be considered in the EIR.” As a reader of Appendix F will quickly conclude, most of the items on the lists in questions apply more easily to a traditional development project, such a proposed subdivision, than to a project such as the EDE, which consists primarily of a set of General Plan policies intended to encourage and facilitate economic development, combined with the identification of Target Areas for future development, economic opportunity areas, and economic development reserve areas. Such projects lack specific development proposals on which the City could directly impose mitigation measures intended to reduce energy consumption. So much of Appendix F is simply too specific to apply to the EDE. Even so, the City, in preparing this EIR, has been very cognizant of Appendix F and has tried to address its contents and suggestions where appropriate and feasible. For example, mitigation measure GHG-1 requires that GHG reduction plans be prepared for future development projects whose GHG emissions exceed a specific volume threshold. Reduction plans are to include measures to reduce GHG emissions. These measures are likely to focus on reducing on-site energy consumption and/or reducing vehicle fuel consumption through measures that reduce vehicle miles traveled.
Development of the Target Areas will result in increased demand for energy during construction and operations of future projects. Similarly, City operations needed to serve new development and to support City services and infrastructure will result in increased energy demand. Primary sources of energy use will be transportation fuels, electricity, and natural gas.

For purposes of this analysis, implementation of the EDE as expressed through development of the Target Areas would be considered to result in wasteful or inefficient consumption of energy if it failed to comply with related General Plan policies and failed to implement energy demand reduction/efficiency measures. A multitude of state regulations and legislative acts are aimed at improving vehicle fuel efficiency, energy efficiency, and energy conservation. Several of these are described below. Through the CEQA and development review processes, the City will implement these state regulations and guide development of the Target Areas to reduce energy consumption.

**Methodology**

Estimates of projected energy demand are based on a number of sources cited in this section, including the traffic impact analysis and greenhouse gas emissions (GHG) modeling. The traffic impact analysis and GHG modeling assume that full buildout of Target Areas would occur by 2045.

**Energy Setting**

Pacific Gas and Electric (PG&E), one of the five largest utilities in the state, is the primary purveyor of electricity and natural gas in the County and the City. PG&E operates a major network of electricity and natural gas transmission lines within its service area, including Monterey County.

For more than a decade, federal, state and regional energy agencies and energy providers have been focused on reducing growth in fossil-fuel based energy demand, especially in the form of transportation fuels and electricity. Key environmental goals have been to reduce air pollutants and GHGs. As a result, investments in a range of energy efficiency and conservation programs and technologies to improve transportation fuel efficiency have been increasing, as has the focus on land use planning as a tool to reduce vehicle trips/lengths and transportation related energy use.

Per the traffic impact analysis discussed in Section 3.12, Transportation, and included in Appendix I (found on CD on the inside back cover of this EIR), vehicle miles traveled (VMT) in Salinas in 2016 was modeled at 481,843,640 miles. VMT serves as a general proxy for the magnitude of transportation fuel consumption. As described in Section 3.5, Climate Change,
AMBAG produced the *City of Salinas Draft Greenhouse Gas Emissions Inventory 2005 Baseline Report*. Appendices B and C of the inventory show that total electricity consumption from residential, commercial, and industrial uses in Salinas was approximately 626,379,248 kilowatt hours (kWh). Natural gas consumption from these uses was approximately 28,978,829 therms. The energy content of natural gas is measured in British Thermal Units (BTU). A BTU is the amount of energy required to raise the temperature of one pound of water by one degree Fahrenheit. A therm is equal to 100,000 BTU. Though the inventory is now over 10 years old, given the economic downturn that occurred from 2007 into 2011, and the fact that no new substantial residential, commercial, or industrial development has occurred in Salinas since that time, the 2005 information is still considered to be representative of current conditions.

**Energy Regulatory Setting**

The need for energy conservation and transportation fuel efficiency (through vehicle trip reduction and improved mileage) is embodied in many federal, state, and local statutes and policies. At the federal level, energy standards apply to numerous products (e.g., the EnergyStar™ program) and transportation (e.g., vehicle fuel efficiency standards). At the state level, Title 24 of the California Code of Regulations sets energy standards for buildings, rebates/tax credits are provided for installation of renewable energy systems, and the Flex Your Power program promotes conservation in multiple areas. Important, representative energy conservation guidance, regulations, and legislation are summarized below.

**California Energy Commission**

The California Energy Commission is California’s primary energy policy and energy planning agency. Created by the California Legislature in 1974, the California Energy Commission has five major responsibilities: 1) forecasting future energy needs and keeping historical energy data; 2) licensing thermal power plants 50 megawatts or larger; 3) promoting energy efficiency through appliance and building standards; 4) developing energy technologies and supporting renewable energy; and 5) planning for and directing state response to energy emergencies. Under the requirements of the California Public Resources Code, the California Energy Commission, in conjunction with the Department of Conservation’s Division of Oil, Gas, and Geothermal Resources, is required to assess electricity and natural gas resources on an annual basis or as necessary. The Systems Assessment and Facilities Siting Division of the California Energy Commission provides coordination to ensure that needed energy facilities are authorized in an expeditious, safe, and environmentally acceptable manner.
California 2008 Energy Action Plan Update

The state adopted the *Energy Action Plan* in 2003, followed by the *Energy Action Plan II* in 2005. The current plan, the *California 2008 Energy Action Plan Update*, is California's principal energy planning and policy document. The updated document examines the state's ongoing actions in the context of global climate change, describes a coordinated implementation plan for state energy policies, and identifies specific action areas to ensure that California's energy resources are adequate, affordable, technologically advanced, and environmentally sound. The *California 2008 Energy Action Plan Update* establishes energy efficiency and demand response (i.e., reduction of customer energy usage during peak periods) as the first-priority actions to address California's increasing energy demands. Additional priorities include the use of renewable sources of power and distributed generation (e.g., the use of relatively small power plants near or at centers of high demand). To the extent that these actions are unable to satisfy the increasing energy demand and transmission capacity needs, clean and efficient fossil-fired generation is supported. The *California 2008 Energy Action Plan Update* examines policy changes in the areas of energy efficiency, demand response, renewable energy, electricity reliability and infrastructure, electricity market structure, natural gas supply and infrastructure, research and development, and climate change (California Energy Commission 2008).

California Building Codes

California’s *Energy Efficiency Standards for Residential and Nonresidential Buildings* (California Code of Regulations, Title 24, Part 6) were first established in 1978 to reduce California's energy consumption. The standards were most recently updated in 2016. Energy efficient buildings require less electricity, natural gas, and other fuels.

The *Green Building Standards Code* (also known as CALGreen), which requires all new buildings in the state to be more energy efficient and environmentally responsible, took effect in January 2011 and was most recently updated in January 2016. These comprehensive regulations are intended to achieve major reductions in interior and exterior building energy consumption.

Energy Efficiency Act of 2006 (AB 2021)

This bill encourages all investor-owned and municipal utilities to aggressively invest in achievable, cost-effective, energy efficiency programs in their service territories.

California Assembly Bill No. 1493 (“Pavley I Rule”)

AB 1493 was enacted on July 22, 2002. It requires CARB to develop and adopt regulations that improve fuel efficiency of vehicles and light-duty trucks. Pavley I requirements apply to these vehicles in the model years 2009 to 2016.
**Advanced Clean Cars**

In January 2012, CARB adopted an Advanced Clean Cars program, which is aimed at increasing the number of plug-in hybrid cars and zero-emission vehicles in the vehicle fleet and on making fuels such as electricity and hydrogen readily available for these vehicle technologies.

**Renewable Energy Legislation/Orders**

The California Renewable Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20 percent of their retail sales with renewable power by 2017, was established by SB 1078 in 2002. The renewable portfolio standard was accelerated to 20 percent by 2010 by SB 107 in 2006. The program was subsequently expanded by the renewable electricity standard approved by CARB in September 2010, requiring all utilities to meet a 33 percent target by 2020. The Legislature then codified this mandate in 2011 with the enactment of Senate Bill X1-2. SB 350, adopted in September 2015, increases the standard to 50 percent by 2030. This same legislation includes statutes directing the California Energy Commission and Public Utilities Commission to regulate utilities producing electricity so that they will create electricity-generation capacity sufficient for the widespread electrification of California's vehicle fleet, as a means of reducing GHG emissions associated with the combustion of gasoline and other fossil fuels. Thus, the Legislature envisions a dramatic increase in the sales and use of electric cars, which will be recharged with electricity produced with cleaner and cleaner power sources.

**Projected Energy Consumption**

The three primary sources of long-term energy consumption from new development and operations within the city will be fuel use in vehicles traveling within, and to and from the city, use of natural gas, and use of electricity. Each of these energy consumption sources is described below.

**Transportation Fuel Use**

The traffic impact analysis is included in Appendix I. It includes analysis of the number of annual vehicle miles traveled (VMT) by vehicle trips originating within and traveling to Salinas in specific target years. Under existing (2016) conditions, daily VMT was estimated at 481,843,640 miles. Under 2045 cumulative development conditions without the proposed project, VMT increases to 620,149,727 miles. Buildout of the Target Areas would add a projected 10,350,676 VMT to the 2045 without project conditions for a total of 630,500,403 miles per year. This includes travel for all types of vehicles in the vehicle fleet including
passenger cars and trucks and light and heavy duty trucks. The 2045 with project conditions VMT includes changes in travel patterns from construction of the proposed new expressways.

As VMT increases, consumption of vehicle fuels will increase, though the rate of increase will be significantly reduced by continuing improvements in vehicle fuel efficiency, increases in the percentage of the vehicle fleet comprised of zero emissions vehicles, and technological advances in the formulation and deployment of alternative fuels. The change in VMT from 2045 without to 2045 with project conditions (or 10,350,676 miles) was input into the EMFAC model to estimate the change in fuel demand that would result from the VMT increase. The proposed project would result in an increase in fuel demand of about 345,000 gallons per year relative to the 2045 without project conditions. EMFAC fuel demand results are included Appendix E.

**Electricity**

The 2011 GHG inventory prepared by AMBAG indicates that in 2005, electricity consumption from residential, commercial, and industrial development was estimated at about 626,379,248 kWh. According to Energy Consumption Data Management System information maintained by the California Energy Commission, in 2005, total electricity consumption in Monterey County was 2,553,000,000 kWh (http://www.ecdms.energy.ca.gov/elecbycounty.aspx). City demand represented approximately 25 percent of total county demand. Section 5.3, Energy by Land Use, Unmitigated - Electricity, in the CalEEMod (Appendix E) results shows that without additional energy efficiency/conservation in place to further conserve electricity demand from new development within the Target Areas, electricity demand associated with their buildout would equal about 81,800,000 kWh. This is an approximately 3.2 percent increase relative to the 2005 baseline demand in Salinas.

**Natural Gas Use**

The 2005 emissions inventory indicates that in 2005, natural gas consumption from residential, commercial, and industrial uses in Salinas was estimated at about 28,929,000 therms. According to Energy Consumption Data Management System information maintained by the California Energy Commission, in 2005, total natural gas consumption in Monterey County was 91,500,000 therms (http://www.ecdms.energy.ca.gov/gasbycounty.aspx). In 2005, city demand represented approximately 32 percent of total county demand. Table 5.2 Energy by Land Use, Unmitigated – Natural Gas, in the CalEEMod results (Appendix E) shows that at buildout of the Target Areas, natural gas demand from buildout of the Target Areas would be about 62,100,000,000 BTU (621,000 therms). This is an approximately 2.2 percent increase relative to Salinas’ 2005 baseline demand.
**Guidance for Energy Efficiency/Conservation**

**Reduction of Energy Use - Regulatory Requirements**

As described in the Regulatory Setting above, a number of federal and particularly state regulatory programs are being implemented to improve the efficiency of transportation fuel, natural gas, and electricity use. New development within Salinas must comply with the regulations, many of which are beyond the implementation control of City government and project developers. For example, in the transportation sector, the Pavley I and II standards and the Advanced Clean Car standards will result in improved transportation fuel efficiency. The gradual increased usage of electric cars powered with cleaner electricity will also reduce fossil fuel usage associated with transportation. In the building energy use sector, implementation of CALGreen and Title 24 building standards will reduce natural gas and electricity consumption.

**City of Salinas General Plan**

The General Plan includes a multitude of policies and programs which will directly and indirectly result in reduced energy consumption. Please refer to the Regulatory Setting section of Section 2.5, Climate Change, under the discussion of the City of Salinas General Plan policies and implementation programs that would result in reduced GHG emissions and through so doing, reduce VMT/fuel consumption, electricity demand, and natural gas demand.

**Energy Based GHG Mitigation Measure**

To reduce the volume of GHG emissions from future individual development projects within the Target Areas, mitigation measure GHG-1 in this EIR requires that individual project developers prepare GHG reduction plans. Implementation of the mitigation measure is anticipated to result in reduced electricity, natural gas, and vehicle fuel energy consumption. Please refer to Section 3.5, Climate Change, for more information.

Developers of future individual development projects within the Target Areas will be required to comply with state regulatory requirements for energy conservation and efficiency. If a qualified City-adopted GHG plan is in place, future projects must also comply with energy consumption reduction measures included in it. If a City-adopted GHG plan is not in place, future development would be required to comply with measures included in individual project GHG reduction plans per mitigation measure GHG-1. These requirements would assure that buildout of the Target Areas would not directly or indirectly result in inefficient, wasteful, and unnecessary consumption of energy.


5.5 **Economic Effects/Urban Decay**

This section presents analysis and findings regarding potential urban decay from physical deterioration of existing buildings and properties (urban decay) resulting from the proposed project.

**Urban Decay Background and Definition**

CEQA Guidelines section 15131 states that economic and social effects of a project shall not be treated as significant effects on the environment. However, an EIR may trace a chain of cause and effect from a decision on a proposed project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes.

The development of large commercial retail centers, including those that include “big box” retail uses and/or diverse retail offerings, may have the potential to result in economic impacts on existing commercial businesses located within the trade area. This impact can occur if new large retail centers capture a significant share of retail expenditures that contribute to the economic viability of the existing businesses. If existing businesses close as a result of competitive pressures and the buildings cannot be readily re-leased, general deterioration and decay of the buildings and properties is possible. This could be considered an indirect environmental impact.

The urban decay process generally takes a number of years to fully materialize and is reinforced by declining economic conditions in a broader area. It is generally not the result of a single property standing vacant for one or two years in an otherwise vibrant market. It is worth noting that a declining regional mall known as a “grayfield” can pose a particularly high risk for urban decay if not promptly re-leased or redeveloped. Not only are these facilities bigger and thus generally more difficult to quickly re-lease or reuse compared to small “infill” sites, they are also more visually significant and thus provide a more widespread signal of decay and negative business climate. In contrast, a number of smaller parcels with varied building types often have a better chance of being adapted and re-leased.

**Urban Decay Analysis Methodology**

Given the multi-faceted nature of urban decay, its prospects for likelihood can be difficult to predict or quantify with precision. Nevertheless, a typical urban decay analysis methodology provides insight to factors that could contribute to urban decay and factors that could diminish the potential for urban decay. The general components of an urban decay analysis typically include the following: 1) identify the trade area that would be affected by/affect retail sales from a proposed project; 2) determine existing and projected market conditions/retail sales volume within the trade area; 3) determine the leakage of retail sales expenditures that flow outside of the trade area that could be captured by the retail components of a proposed project; 4) evaluate
the potential sales to be generated by the retail uses from a proposed project; 5) assess the magnitude of future sales within the trade area that could be captured by the retail component of a proposed project, and on this basis, project whether competitive pressure from a proposed project could result in store closures elsewhere within the trade area that lead to urban decay; and 6) identify variables that could affect the urban decay determination.

**New Retail/Commercial Development Capacity Enabled by the EDE**

Target Areas N, L2, F, and V, and portions of K and B would be designated Retail. This designation allows a range of retail uses such as retail stores, restaurants, hotels, personal services, business services and financial services. Approval of the EDE (with subsequent consideration and approval by the City and LAFCO to amend the City’s SOI and annex all but Target Areas V) would be a first step in adding up to 1,383,030 square feet of Retail use building development capacity in the City. An additional 810,448 square feet of Retail use building capacity would be possible within Target Area V without these subsequent approvals, as Target Area V is already within the city limits.

Target Areas B and F include a combined 174,240 square feet of Retail building capacity. This capacity is somewhat limited and conceptually designed to capture economic development potential for visitor-serving uses at a future Eastside Expressway/U.S. Highway 101 interchange. These uses are not expected to have potential to compete with existing Retail uses in Salinas at a level that has significant potential to cause closures of existing Retail businesses.

**Speculative Nature of Projecting EDE Urban Decay Impacts**

CEQA Guidelines section 15146, Degree of Specificity, states that the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. This program EIR evaluates environmental impacts of the EDE at the level of detail enabled by the project description included in Section 2.0. While the project description includes estimated new building development capacity that could result from implementing the proposed project, the programmatic nature of the proposed general plan amendment is such that detailed information in not available about the specific types or sizes of future individual Retail uses that could locate within Target Areas N, L2, K, or V. As evidenced in the prior summary of methodology for assessing urban decay impacts, specific information about Retail use types, sizes, and locations is prerequisite to assessing such impacts.

CEQA Guidelines section 15145, Speculation, identifies that if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should
5.0 Other CEQA Topics

note its conclusion and terminate discussion of the impact. Since no information is currently available about the future individual project types that may locate within Target Areas N, L2, K or V, it would be speculative to assess potential for the proposed project to result in urban decay impacts. As part of the CEQA processes conducted for future individual projects proposed within these Target Areas, the City will, based on the character of the projects, determine whether the CEQA documentation should include analysis of their potential urban decay impacts. No further evaluation of urban decay effects is required as part of this program EIR.
6.0

ALTERNATIVES

6.1 CEQA REQUIREMENTS

CEQA Guidelines Section 15126.6(a) requires a description of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. Furthermore, an EIR need not include any action alternatives inconsistent with the lead agency's fundamental underlying purpose in proposing a project. (In In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1166.) The following are additional CEQA Guidelines sections regarding alternatives that frame the subsequent definition and evaluation of alternatives:

- Section 15126.6(a) states that an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

- Section 15126.6(b) requires that the discussion of alternatives focus on those alternatives capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.

- Section 15126.6(e) stipulates that no project alternative be evaluated along with its impacts.
6.0 Alternatives

- Section 15126.6(c) establishes that the range of potential alternatives include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. An EIR should also identify alternatives that were considered but rejected as infeasible, and briefly explain the reasons for the determination.

- Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

- Section 15126.6(f)(2) states that a key question and first step in alternatives analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in an EIR.

- Section 15126.6(d) requires the EIR to present enough information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

- Section 15126.6(e) requires the identification of an environmentally superior alternative. If the "No Project" alternative is the environmentally superior alternative, then the environmentally superior alternative amongst the remaining alternatives must be identified.

6.2 Review of Significant Project Impacts and Project Objectives

As noted previously, CEQA Guidelines Section 15126.6(b) requires that the discussion of alternatives focus on those alternatives capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. To set the context for the alternatives evaluation, the significant impacts of the proposed project as well as the project objectives, both of which are significant considerations in the choice and evaluation of project alternatives, are summarized below.
Summary of Project Impacts

Based on the analysis provided in this EIR, the proposed project would result in (i) significant impacts that can be mitigated to less than significant with implementation of mitigation measures, (ii) potentially significant and unavoidable impacts, and (iii) significant unavoidable impacts.

Significant and Unavoidable Impacts

- Substantial change in visual character due to their conversion of agricultural land to urban use and loss of important existing views of valuable visual resources in the form of agricultural landscapes and potentially of more distant mountain views;
- Convert 502 acres of Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) to non-agricultural use;
- Generate a significant volume of greenhouse gas emissions;
- Generation of traffic noise that exceeds standards;
- Reduce the following County and Caltrans road segments to unacceptable levels of service:
  - Alisal Road between E. Alisal Street and Hartnell Road (County)
  - Crazy Horse Canyon Road south of U.S. Highway 101 (County)
  - Espinoza Road west of U.S. Highway 101 (Partial/Both)
  - Harris Road west of Abbott Street (County portion outside the city limits)
  - San Juan Grade Road between Hebert Road and Crazy Horse Canyon Road (County)
  - Castroville Road (SR 183) between Espinosa Road and SR 156 (Caltrans)
  - U.S. Highway 101 between John Street (SR 68) and Market Street (Caltrans)
  - U.S. Highway 101 between Main Street (SR 183) and Laurel Drive (Caltrans)
  - U.S. Highway 101 between Laurel Street and Boronda Road (Caltrans)
  - U.S. Highway 101 between Market Street and Main Street (SR 183) (Caltrans)

The impacts listed above also represent cumulatively considerable (i.e., significant) and unavoidable impacts of the proposed project as discussed in Section 4.0, Cumulative Impacts.
The visual resource impact is cumulatively considerable given the large number of acres of scenically valuable farmland that would be lost to urban use and the high frequency by which the perception of visual change will be noticeable (e.g., from U.S. Highway 101). The farmland impact is cumulatively considerable in light of other conversion of farmland occurring throughout the County. The greenhouse gas emissions impact is cumulatively considerable in the context of statewide and global conditions. The transportation impacts are cumulatively considerable because the impacts are identified in light of cumulative development within the counties of Monterey, Santa Cruz, and San Benito.

Summary of Project Objectives

The project objectives restated as they appear in Section 2.4.1, Statement of Objectives, are as follows:

The underlying purpose of the EDE is to provide additional land supply needed to meet long-term employment generation needs through General Plan buildout and to promote availability of new sites to support business growth through focused land use planning, targeted circulation, utility infrastructure improvements, and expanded resource availability. This purpose, in turn, has given rise to the following project objectives, which focus on desired outcomes of the EDE in terms of its land use, job generation, and circulation related strategies and policies:

- Improve the City’s attractiveness as an investment destination for employment-generating businesses by reducing land costs through increased land supply;
- Promote and prepare the Target Areas for private investment;
- Improve economic diversification and expansion within the City;
- Support General Plan land use strategies and policies that promote economic growth through infill development and through revitalizing/redeveloping existing developed areas and/or intensifying uses in existing developed areas such as the Focused Growth Areas;
- Through business expansion and attraction, provide residents with greater opportunities for employment in well-paying, career ladder oriented jobs;
- Become the recreation, entertainment, and sports destination of the Central Coast through improving, enhancing and attracting additional recreational, entertainment and sports related facilities and uses; and
- Invest in public infrastructure to improve circulation, connectivity and access.
6.3 Alternatives Considered But Not Analyzed

As indicated above, potential alternatives may be eliminated from detailed consideration in an EIR if they fail to meet the fundamental underlying purpose of a project, fail to meet most of the basic project objectives, are clearly infeasible, or do not avoid or substantially reduce any significant environmental effects of the project as proposed. The following alternatives were considered, but were not discussed in detail for one or more reasons presented.

Relocation of Target Area Development Capacity to Infill Sites

The City received a comment on the NOP with a recommendation to consider an alternative that relocates new proposed development capacity within the Target Areas to infill sites within the City. The City elected not to evaluate this alternative in detail for reasons described below.

A fundamental component of the proposed project is to identify how projected employment needs will be satisfied through providing land capacity for new employment generating economic development. Land capacity requirements are met in part through the new land area included in the Target Areas. As part of the EDE planning process, the City considered the implications of expanding land capacity in these locations relative to placing new development capacity on infill parcels within the city limits and on vacant parcels within the SOI.

The balance between infill development/revitalization of existing development areas within the city limits and new growth within the Target Areas is described in Section 2.4.1, Land Use Pattern and Potential for Change. In summary, the proposed project already assumes that infill development on vacant and underutilized parcels and revitalization of existing development areas within the city limits is maximized in order to accommodate projected employment generating development in the institutional and visitor-serving sectors. Employment growth in these two sectors is projected to represent 54 percent of the total employment growth needed at General Plan buildout. To provide for this new employment capacity, the City will need to aggressively pursue and promote infill development and revitalization of existing developed areas. The proposed project reinforces existing General Plan infill policies and priorities by assuming infill development within the city limits is a fundamental tool for facilitating future employment generation.

After projecting the need for substantial employment generation within the city limits, the proposed project then prioritizes employment generating development on land outside the city limits but within the SOI. The remaining balance of the required land capacity needed to meet long-term employment generation needs is then proposed within the Target Areas located outside of the SOI and within Target Area V.
Given the fact that the proposed project already assumes that institutional and visitor-service sector employment needs will be met through substantial infill/revitalization within the city limits and new development within the existing SOI, an infill alternative to the proposed project would not likely avoid or substantially lessen significant impacts associated with the proposed project. Further, this alternative would not likely meet the fundamental project objective of enabling new employment-generation capacity through provision of new land capacity.

**Redesignate Existing Vacant Residential Lands to Employment Generating Land Use(s)**

Two comments on the NOP, from LandWatch and the Ag Land Trust, respectively, recommended that the City consider a General Plan amendment alternative to change existing residentially designated land located within the City to a designation(s) that accommodate employment generating uses. The purpose would be to reduce or eliminate land capacity proposed within the Target Areas. The City elected not to evaluate this alternative primarily because of its need to retain housing development capacity across a range of affordability levels.

The City has completed the draft *City of Salinas 2015-2023 Housing Element* (Tam and Associates 2016). For the fifth cycle Housing Element, the City’s has been assigned a regional housing needs assessment number of 2,093 dwelling units. That is, to meet its obligation to provide its regional share of new housing stock over the period of 2014-2023, the City is required to facilitate construction of 2,093 housing units. The cost of the units must be affordable to people at extremely/very low (517 units), low (330 units), moderate (400 units), and above moderate (846 units) income levels.

The City has available sites that provide development opportunities with sufficient capacity to meet and exceed the identified housing need. The opportunities consist of vacant residential sites, vacant mixed use sites, and underutilized mixed use sites. The available housing site inventory in the housing element shows capacity for 3,176 units, 1,733 of which are on sites suitable for development of lower income housing, so the City has the ability to adequately accommodate its regional share of new housing development.

While the housing site inventory suggests that the City has capacity to meet its current regional housing need, it is crucially important to maintain land capacity for new housing that exceeds the minimum capacity required to accommodate the City’s regional housing need. The housing element includes discussion of land costs as a constraint to developing additional housing. It notes that land costs have a demonstrable influence on the cost and availability of affordable housing. Land prices are determined by a number of factors, most important of which are land availability and permitted development density. As land becomes less available, the price of land
increases. In coastal Monterey County, as across the state, undeveloped land available for residential development is limited, and combined with a growing population, this limited inventory has caused land prices to increase. Maintaining land capacity that exceeds the minimum necessary is fundamental to managing land costs by spurring land sales competition among land owners.

Access to safe and affordable housing is a fundamental component of health and quality of life. The EDE is not only focused on employment generation, but also on maintaining/improving the quality of life for the City’s residents. The City’s critical shortage of affordable housing reinforces the need to maintain land capacity for development of all housing types, including affordable housing, which will improve quality of life in the City.

It should be noted that the draft housing element does not consider residential development land capacity within the North of Boronda Future Growth Area. As stated in the draft housing element, the specific plans for major projects within this area are not anticipated to be approved or developed until later in the Housing Element planning period. As specific zoning and development regulations have not been approved for the subject properties, development potential in the area is not considered as a resource to meet the City’s share of the regional housing need.

**Increased Retail Floor to Area Ratio**

The City received from Building Healthy Communities a comment on the NOP with a recommendation to consider an alternative in which the Retail uses included in the proposed project are developed at a higher FAR in order to reduce their development footprint and associated environmental effects.

The City elected not to evaluate this alternative in detail for several reasons. First, this recommendation is included in Alternative 2 – GSA MOU Amendment for a portion of the Retail use included in the proposed project. Alternative 2 proposes that 40 acres of Retail land capacity proposed in Target Area N would be moved to Target Area K with the FAR increased from 0.25 to 0.40. This change does have potential to reduce a number of environment impacts of the proposed project, as described in the discussion of Alternative 2. Second, the retail sector is in a state of flux in the current post-recession environment. The City is uncertain whether retail development at higher intensity of .40 FAR will be attractive to the retail sector development community given conditions in the regional and local Salinas market. This would require further detailed analysis that is outside the scope of this EIR and more appropriately conducted for individual proposed retail projects.
6.4 ALTERNATIVES ANALYZED

As described in Section 6.2, the proposed project would result in significant unavoidable impacts. In addition to the required evaluation of the no project alternative, three additional project alternatives are proposed for the purpose of reducing one or more of the significant impacts. For each alternative, a discussion of its ability to meet the project objectives described in Section 6.2 above is also provided.

Section 15126.6(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and if the environmentally superior alternative is the No Project alternative, then an environmentally superior alternative be selected from among the other alternatives.

Four alternatives to the proposed project have been evaluated. In summary, they are as follows:

- **Alternative 1: No Project/No Development**

- **Alternative 2: GSA MOU Amendment**
  
  This alternative is evaluated solely at the request of the County of Monterey Resource Management Agency. This alternative removes Target Area N from the proposed project in light of the County’s concern that development of Target Area N would result in loss of high value agricultural land to the south of the City. Conserving such land is a topic that is addressed in the 2006 Greater Salinas Area Memorandum of Understanding (GSA MOU).

- **Alternative 3: GSA MOU Consistency**
  
  This alternative includes modifications to the proposed project that maximize its consistency with the GSA MOU. It modifies the proposed project by eliminating a greater number of Target Areas than proposed in the GSA MOU Amendment Alternative. Consideration of this alternative was also requested by the County of Monterey Resource Management Agency.

- **Alternative 4: Target Area V**
  
  This alternative considers environmental effects of changing the Retail land use designation proposed for Target Area V to Mixed Use and relocating a portion of the Target Area to an alternative location within Economic Opportunity Area V. All other aspects of the proposed project are retained.

Each of the alternatives is described below, followed by a general review of the significance of its impacts. The significance of each impact of the proposed project and the significance of each impact of each alternative is specifically identified in Section 6.5, Alternatives Comparison and Environmentally Superior Alternative.
Alternative 1 – No Project/No Development

In general, a CEQA “No Project Alternative” must “discuss the existing conditions …, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” (CEQA Guidelines, § 15126.6, subd. (e)(2).) When the proposed project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future. In such an instance, the no project alternative consists of evaluating the projected impacts of the proposed plan to the impacts that would occur under the existing plan. “Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan. (Id., subd. (e)(3)(A).)

Description

As the proposed project is a revision/amendment to the existing General Plan, the no project alternative analysis focuses on the impacts that would occur from potential future development within the Target Areas under the existing plan land use designations that apply to them. In the case of Target Area V, the existing General Plan designation is Park. This land use designation allows for public and private recreation, such as parks and golf courses, multipurpose fields and courts, community event spaces, nature study centers, etc. In the absence of the proposed project, Target Area V could be nominally developed with one of the noted use types. Projecting the types and intensity of impacts that could result would be speculative in the absence of a specific proposed project type. However, it is likely that most, if not all, impacts of such uses would be reduced relative to impacts from the substantially more intensive development that could occur under the Retail land use designation that applies to Target Area V. Target Area V contain 115 acres, or approximately 21 percent, of the 558 total acres within all Target Areas.

Target Areas F, B, N, L2 and K comprise approximately 443, or approximately 79 percent, of the total of 558 acres within all Target Areas. These Target Areas are within unincorporated Monterey County. They are designated Agriculture in the Monterey County General Plan. This designation essentially limits their use to agricultural production and ancillary improvements that support the primary function of agricultural production. Therefore, in the absence of the proposed project, no new urban development would be permitted within these Target Areas. The land within Carr Lake is designated Park in the City of Salinas General Plan. The Park designation does allow development in form of multi-purpose fields for community events, areas for active sports play, picnic areas, sports fields and courts, golf courses, concessions, etc. In the following analyses of how this alternative compares to the proposed project, the effects of developing Target Area V with retail uses is compared to the effects of developing the Target Area with uses permitted per the Park designation.
6.0 Alternatives

Aesthetics

This alternative would have less-than-significant aesthetics impacts (change in visual character and increase in sky glow) associated with development within Target Area V, as only low-intensity recreational-related uses consistent with the existing General Plan Park designation would be permitted and these uses would be subject to review by the City for consistency with General Plan policies and Zoning Code design and development standards regarding visual resources and aesthetics. This alternative would have no effect on visual resource or sky glow conditions within Target Areas F, B, N, L2 and K, as existing agricultural uses permitted per the Monterey County General Plan would be maintained. The impact of this alternative on visual resources is less than significant.

This alternative would have no visual resource impacts relative to development of Target Areas F, B, N, L2, and K proposed as part of the proposed project. It would avoid the significant, unavoidable aesthetic impacts of the proposed project associated with development of Target Areas B and K. This alternative is superior to the proposed project from an aesthetics impact perspective.

Agricultural Resources

This alternative is assumed have significant impacts on agricultural resources associated with Target Area V, as under the existing City of Salinas General Plan, some increment of agricultural land conversion could occur under the Park designation that applies to it. No loss of agricultural land would occur within Target Areas F, B, N, L2, or K from urban development as none of these areas would be converted to urban use. This alternative substantially lessens the significant unavoidable impact of the proposed project that would otherwise occur from conversion of this land to non-agricultural use. However, the alternative still results in a significant unavoidable impact on agricultural resources as it would convert agricultural land within Target Area V to non-agricultural use, even with implementation of compensatory mitigation to partially mitigate for the permanent loss of agricultural land. With this alternative, the significant, but mitigatable impacts of conflict of development with Williamson Act zoning within Target Area B and conflict with an agricultural conservation easement with Target Area B would remain.

This alternative would avoid the significant unavoidable impacts of converting approximately result 387 acres of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland found within Target Areas F, B, N, L2, and K that would not be developed under this alternative. The alternative is superior to the proposed project from an agricultural resources impact perspective.
Air Quality

This alternative is assumed to have significant, but mitigatable air quality impacts associated with development of Target Area V consistent with the City of Salinas General Plan Park designation. This stems from potential impacts associated with exceeding particulate emissions thresholds during construction. No change regarding air quality conditions would occur within Target Areas F, B, N, L2, and K.

Relative to the proposed project, this alternative would have no impacts on air quality associated with proposed development within Target Areas F, B, N, L2, and K. Air emissions would be reduced by approximately 79 percent by volume as compared to the proposed project. This alternative would substantially lessen the significant, but mitigatable impacts of the proposed project. Therefore, this alternative is superior to the proposed project from an air quality impact perspective.

Biological Resources

This alternative is conservatively assumed to have potentially significant, but mitigatable impacts on biological resources from development of Target Area V per the City of Salinas General Plan. This determination is based on the assumption that a detailed biological resources evaluation for this Target Area would find protected special-status plant and/or wildlife species to be present, and conservatively that natural communities would also be identified as present. The same mitigation measures applied to this alternative would also reduce its impacts to less than significant. This alternative would have no effect on biological resource conditions within the remaining Target Areas.

This alternative would avoid impacts on biological resources that may be present within Target Areas F, B, N, L2, and K, which represent 79 percent of the land area included in the proposed project. Therefore, the significant, but mitigatable biological resources impacts of the proposed project would be substantially lessened with this alternative. This alternative is, therefore, superior to the proposed project from a biological resources impact perspective.

Climate Change

This alternative is conservatively assumed to result in significant unavoidable impacts from GHG emissions resulting from development of Target Area as permitted per the City of Salinas General Plan Park designation. It is possible that such uses could result in significant traffic generation and creation of a significant volume of mobile source GHG emissions. This alternative is conservatively assumed to have significant unavoidable impacts on climate change from generation of a significant volume of GHG emissions. This alternative would generate no GHG emissions relative to the remaining Target Areas.
Development of park related uses within Target Area V per the existing Park designation is likely to result in fewer GHG emissions than would its development with retail uses as included in the proposed project. However, with no development in the remaining Target Areas, this alternative would result in an approximately 79 percent reduction in the total GHG emissions volume projected for the proposed project. This alternative would substantially lessen the significant and unavoidable impacts of the proposed project. Therefore, this alternative is superior to the proposed project from a climate change impact perspective.

**Cultural Resources**

This alternative is assumed to have potentially significant, but mitigatable impacts on historical resources, unique archaeological resource, human remains, and paleontological resources within Target Area V if determined to be present. It is assumed that the potentially significant impacts of this alternative can be mitigated to less than significant through implementation of mitigation measures contained in this EIR and/or that may be recommended through site specific cultural resources evaluations that would be required for individual development projects.

This alternative would avoid potential impacts on cultural resources and paleontological resources within Target Areas F, B, N, L2, and K. Therefore, this alternative could substantially lessen the significance of these impacts relative to the proposed project because it avoids development on 443 acres, or 79 percent, of the land area included in the proposed project. This alternative is superior to the proposed project from a cultural resources perspective.

**Geology and Soils**

As described in Section 3.7, Geology and Soils, the California Supreme Court recently held in the 2015 “California Building Industrial Association (CBIA)” case that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents. Prior to the CBIA case, CEQA analyses of potential geology and soils impacts of a project typically focused on existing geologic hazards that have potential to cause risk to public health and safety. Subsequent to this case, exposure to existing geologic hazards conditions is not considered under CEQA unless a proposed project has potential to exacerbate existing geologic hazards conditions and increase risks to structures and public safety. While Section 3.7 includes these analyses, they are included only for informational purposes and the information is to be considered outside the purview of CEQA. As described in Section 4.0, Cumulative Impacts, development within the Target Areas, including Target Area V, is not expected to exacerbate existing geologic hazards conditions. This alternative would avoid development on the approximately 443 acres of land located within Target Areas F, B, N, L2, and K. Therefore, this alternative would reduce potential risks associated with exposure of structures and people to existing geologic hazards. This alternative is superior to the proposed project from a geology and soils perspective.
**Hazards and Hazardous Materials**

This alternative is conservatively assumed to have potentially significant, but mitigatable impacts related to potential hazardous materials conditions within Target Area V. Land within this Target Area has historically been used for agricultural production and it is possible that agricultural chemical residues may remain in the soils that would pose a public health risk if disturbed during development of urban uses. Similarly, this Target Area is located adjacent to U.S. Highway 101 where potential exists for aerially deposited lead to have contaminated soils near the highway. Development of park related uses per the General Plan Park designation could disturb these soils.

Relative to the proposed project, this alternative would create potential risks to public safety from potentially hazardous materials conditions (agricultural chemical residues or aerially deposited lead) only within Target Area V; similar risks and potentially significant, but mitigatable impacts from these conditions within the remaining Target Areas would be avoided, as it is assumed that agricultural operations would not result in the magnitude of soil disturbance involved in constructing urban development. Therefore, this alternative substantially lessens the potentially significant impacts of the proposed project and is superior to the proposed project from a hazards and hazardous materials impact perspective.

**Hydrology and Water Quality**

**Surface Water Quantity/Flooding and Exposure to Flood Hazards.** This alternative would have less-than-significant flood hazard impacts from development of park related uses within Target Area V as may be permitted by the City of Salinas General Plan. Target Area V is located both within a flood hazard zone and within a regulatory floodway, but risks are less than significant with conformance of new development with the City's flood hazard regulations.

This alternative would avoid the flood hazard risks within Target Area F as identified for the proposed project. It would also avoid potential dam failure inundation effects associated with development of all Target Areas other than Target Area V. Therefore, this alternative is superior to the proposed project from a flood hazard perspective.

**Surface Water Quality (Soil Erosion/Sedimentation and Urban Pollutants).** This alternative would result less-than-significant soil erosion or urban pollutant-related water quality impacts from development of Target Area V with park related uses. Impacts are less than significant with conformance of development with a range of City regulations including SWDS and NPDES requirements. Related surface water quality impacts would not occur within the remaining Target Areas as no change to existing conditions would occur. This alternative would have a less-than-significant impact on soil erosion and urban pollutant related surface water quality.
This alternative would avoid less than significant water quality impacts associated with the proposed project for development within the 443 acres contained within Target Areas F, B, N, L2, and K. Therefore, this alternative is superior to the proposed project from a surface water quality perspective.

**Noise**

Recreational uses currently permitted within Target Area V per the General Plan Park designation are not considered to be noise sensitive; potential impacts on these uses from ambient noise are assumed to be less than significant. Such uses could generate a sufficient volume of traffic with an associated increase in traffic noise that could expose noise sensitive uses in the immediate Target Area V vicinity to noise volumes that exceed thresholds of significance. This alternative is assumed to substantially lessen the significant unavoidable traffic noise impact of the proposed project by reducing overall trip generation by 79 percent, but the impact is not assumed to be avoided. This alternative has potentially significant, but mitigatable impacts from exposure of people/structures to groundbourne vibration.

This alternative avoids or substantially lessens significant, but mitigatable and significant unavoidable impacts of the proposed project. This alternative is superior to the proposed project from a noise perspective.

**Police and Fire Protection**

This alternative is conservatively assumed to nominally increase demand for police and fire protection from development of park related uses within Target Area V as permitted under the Park designation. No increase in demand would occur for the remaining Target Areas as none would be developed with urban uses. This alternative would not result in demand for new or expanded police or fire facilities and would have no impacts resulting from construction of new or expanded police or fire facilities. This alternative is equivalent to the propose project from a police and fire protection perspective.

**Population and Housing**

Like the proposed project, this alternative includes no new residential development capacity and as such, would have no direct effects related to housing development or population. Effects of this alternative are equivalent to those of the proposed project.

**Transportation**

The proposed project has significant unavoidable impacts on the performance of County controlled and Caltrans operated roadway segments. If it is conservatively assumed that Park
uses within Target Area V would generate as much traffic as would the retail uses included in the proposed project for this Target Area, this alternative would eliminate 61,025 trips of the proposed project total daily volume of 82,922 trips. This reduction is the trip generation volume assigned to Target Areas F, B, N, L2, and K. This represents a reduction of 74 percent relative to the proposed project. A project specific traffic impact analysis for this alternative would be necessary to determine its individual impacts. To be conservative, it is assumed that this alternative would have significant impacts on City controlled circulation facilities that are mitigated through payment of the City’s TFO impact fees, and potentially on Caltrans U.S. Highway 101 facilities that are mitigated through payment of the TAMC Regional Fee program fees. Impacts on County facilities are conservatively assumed to be significant and unavoidable even with substantially reduced traffic volumes and the fact that trips would originate near the center of the City – traffic distribution to County facilities would likely be minor. Despite these effects, the substantial reduction in trip volume is expected to substantially lessen and/or avoid many of the significant, but mitigatable, and significant and unavoidable impacts of the proposed project on the performance of the affected road network. This alternative is superior to the proposed project from a traffic perspective.

**Wastewater**

This alternative would result in wastewater generation demand from recreation related uses within Target Area V as may be permitted under the existing City of Salinas General Plan. This alternative results in a substantial reduction in wastewater requiring treatment, as no wastewater generation from development within the remaining Target Areas would occur. This alternative would not require construction of new wastewater treatment facilities, the construction of which may otherwise result in significant environmental impacts. Therefore, it would have less-than-significant related environmental impacts.

Relative to the proposed project, this alternative would avoid generation of a minimum of about 0.51 MGD of wastewater, as it eliminates need to treat wastewater generated within Target Areas F, B, N, L2, and K. This reduction is in part based on a conservative assumption that park related uses within Target Area V would produce an equivalent amount wastewater as retail uses included in the proposed project. The wastewater reduction calculation is derived from Table 44, Target Area Wastewater Generation, in Section 3.13 of this EIR, and on wastewater generation factors applied to the 115-acre area within Target Area V. The proposed project would have a less-than-significant impact from wastewater generation, as the capacity of the regional treatment plant to process the wastewater is adequate without requiring construction of new capacity. This alternative would also have a less-than-significant impact for the same reason. This alternative is equivalent to the proposed project from a wastewater perspective.
6.0 Alternatives

Water Supply

This alternative would limit development to park related land uses within Target Area V. These uses would generate demand for water supply that is derived from groundwater drawn from a groundwater basin that is in overdraft. This alternative would result in no water demand from development within Target Areas F, B, N, L2, and K, as none would occur. As described in Section 3.14, Water Supply, agricultural water demand is generally higher per acre than is water demand from retail, industrial, and business park uses. Water demand from recreation related uses is likely to be lower than from these three use types. Nevertheless, this alternative is also expected to have a beneficial effect by converting agricultural use to urban development. For these reasons, for Target Area V only, this alternative is assumed to have a reduced beneficial impact from increasing groundwater in storage.

Relative to the proposed project, this alternative would result in a substantial increase in demand for groundwater from an impacted groundwater basin because the groundwater demand decrease from converting existing agricultural uses within Target Areas F, B, N, L2, and K to urban use would not occur. As summarized in Table 48, Net Project Water Demand, in Section 3.14, Water Supply, the proposed project would increase groundwater in storage by about 556 acre-feet per year. With a 79 percent reduction in agricultural land converted to urban use as would occur under this alternative, 735 acre-feet per year of groundwater would not be saved. Nevertheless, because conversion of Target Area V to urban use is still expected to result in an increase in groundwater in storage, this alternative is assumed to have a beneficial impact on the groundwater basin.

Project Objectives

The No Project/No Development Alternative does not attain any of the City's objectives for the proposed project. For example, sufficient land supply to meet employment needs through General Plan buildout would not be provided, land costs would not be reduced for employment generating development, and economic diversification and expansion would not be improved.

Alternative 2 – GSA MOU Amendment

The GSA MOU between the City and County is summarized in 2.4.1, Land Use Pattern and Potential for Change. The County has raised concerns about the proposed project in its comments on the NOP and in subsequent communications with the City. The County’s primary concern is about the inconsistency of specific components of the proposed project with the GSA MOU.
The GSA MOU states that the direction of future growth of the City shall be to the north and east of the current city limits, except as otherwise provided for in the GSA MOU. The main purpose of directing new urban growth to the north and east was to direct such development away from the more productive agricultural lands located to the south and west of the City onto the less productive farmlands located to the north and east. The County has expressed particular concern about future urban development south of Blanco Road as represented by Target N, Economic Development Reserve Area N and the Southside Expressway.

**Description**

Alternative 2 – GSA MOU Amendment is designed to address the County’s primary concern about the proposed project’s inconsistency with the GSA MOU. This alternative assumes that the City and County would negotiate amendments to the GSA MOU would enable the proposed project to proceed as proposed but with the following modifications:

- eliminate Target Area N from the proposed project;
- relocate the Target Area N Retail building capacity of 337,590 square feet and its associated employment generation potential to Target Area K; and
- to reduce the overall Retail development footprint within Target Area K, the average FAR of 0.25 for Retail use shown in General Plan Table LU-2 is increased to 0.40. This change applies only to future development within Target Area K. The specific plan required for future development within Target Area K would be used as the tool for enabling the higher FAR within this area only. This change would reduce gross Retail land demand within Target Area K from 70 acres (40 acres from Target Area N plus 30 acres from Target Area K) to 43 acres while still retaining the 337,590 square feet of building potential transferred from Target Area N.

The market feasibility for attracting new Retail development to Target Area K based on the increased FAR has not been evaluated. The FAR increase could enable different types of retail development such as lifestyle centers designed as retail focused destinations (e.g., Santana Row in San Jose) than that typically associated with lower FAR standards. These types of development often require flexible design standards with FARs that permit higher intensity use. Incentive to develop retail buildings of more than one story could be created, thereby reducing the overall building development footprint and reducing the gross acreage of agricultural land converted to urban use.

All other elements of the proposed project would remain the same.

With the above noted modifications, Table 7, Distribution of Land Demand to EOAs Located Outside the SOI, found in 2.4.1, Land Use Pattern and Potential for Change, would be modified.
as shown below in Table 49, Alternative 2 – GSA MOU Amendment Building Development Capacity. Table 49 shows that Target Area N has been eliminated and that the sums of the gross and net Retail acreage land for Target Area L2 and Target Area K (70 acres and 54 acres respectively as shown in Table 7) are consolidated and reduced to 43 acres and 33 acres solely within Target Area K to reflect the higher .40 FAR. Total gross land demand for this alternative is reduced by 27 acres, or about five percent. The Retail building development and employment generation capacity lost with elimination of Target Area N is retained by expanding the Retail building development capacity within Target Area K by 588,060 square feet. Total building development capacity and employment generation with this alternative are the same as for the proposed project.

**Table 49  Alternative 2 – GSA MOU Amendment Building Development Capacity**

<table>
<thead>
<tr>
<th>EOA</th>
<th>Land Use</th>
<th>% of Total Land Use Designation</th>
<th>Land Demand (gross acres)</th>
<th>Land Demand (net acres)</th>
<th>Building Capacity (square feet)</th>
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<td>Subtotal Industrial</td>
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<td>115</td>
<td>1,502,820</td>
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<tr>
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<td>Retail</td>
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<td>8</td>
<td>87,120</td>
</tr>
<tr>
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<tr>
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*Source:* EMC Planning Group 2017

*Note:*  
1. Building capacity based on General Plan FAR of .30 for Industrial, .25 for Retail/.40 for Retail within Target Area K only, and .35 for Business Park.  
2. Total building square footage differs from Table 6 total building square footage due to rounding.

**Figure 23**, Alternative 2 – GSA MOU Amendment, shows that Target Area N has been eliminated as part of this alternative.
The general environmental effects of the GSA MOU Amendment Alternative relative to the proposed project are summarized below.

**Aesthetics**

The proposed project would have significant unavoidable visual impacts associated with development within Target Areas B and K regarding change in visual character. Impacts of converting Target Area N to urban development were found in Section 3.1, Aesthetics to be less than significant. The GSA MOU Amendment Alternative would reduce the overall gross acreage committed to Retail development proposed as part of the EDE through the proposed increase in FAR for this use. However, this alternative would increase the footprint of Retail development within Target Area K. Therefore; it does not avoid or substantially lessen the significant unavoidable visual resources impact of proposed development within Area K. Nor does this alternative substantially lessen or avoid the significant unavoidable impact of development within Target Area B. Its visual impacts regarding these Target Areas remain significant and unavoidable. This alternative is equivalent to the proposed project from a visual resources impact perspective.

**Agricultural Resources**

With this alternative, conversion of a total of 27 fewer acres of Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) would occur than for the proposed project. Therefore, this alternative would lessen the significant unavoidable impacts of the proposed project from loss of farmland, but the impact would remain significant and unavoidable. This alternative would have no effect on the significant, but mitigatable impact of the proposed project from conflict with Williamson Act zoning as neither Target Area N, nor Target Area K include land under Williamson Act contract. The potentially significant, but mitigatable impact of the proposed project regarding facilitating conversion of agricultural land to non-urban use would be avoided relative to Target Area N, and the overall project impact would be lessened, but not substantially.

The GSA MOU Amendment Alternative would substantially lessen the significant and unavoidable impact of the proposed project on agricultural land conversion and is superior to the proposed project for this reason. However, the impact would remain significant and unavoidable.

**Air Quality**

For land use development projects, criteria air emissions from mobile sources (primarily cars and trucks) typically represent the largest percentage of the air emissions inventory of such projects. Indirect air emissions created by burning fossil fuel to produce electricity consumed by a project
and from combusting natural gas consumed by a project (e.g. for space heating) are generally lesser emissions volume sources. Therefore, air emissions from projects that generate fewer vehicle trips and fewer overall vehicle miles traveled can generally be assumed to generate fewer air emissions than projects with higher vehicle trip volumes and vehicle miles traveled. This alternative would not reduce development capacity associated with the proposed project. As a result, the vehicle trip volume generation characteristics of this alternative and the proposed project would be similar.

The proposed project has significant, but mitigatable impacts related to construction phase particulate matter. Other air quality effects are either less than significant or the project has no impact. The GSA MOU Amendment Alternative would lessen, but not substantially, potential construction phase particulate matter impacts by reducing gross acreage to be developed by 27 acres or five percent relative to the proposed project. The impact of the proposed project would remain significant, but mitigatable for construction within the remainder of the Target Areas. This alternative is superior to the proposed project for its lessening of air quality impacts.

**Biological Resources**

The proposed project has significant, but mitigatable impacts on biological resources. This alternative would reduce the gross acreage of undeveloped land that is required to accommodate Retail employment generating uses by increasing the Retail FAR within Target Area K only. Gross land demand acreage would be reduced by approximately 27 acres or five percent relative to the proposed project, with elimination of development capacity within Target Area N and an increase in Retail capacity within Target Area K. Biological resource conditions within Target Area K and within Target Area N are similar (both are predominantly in cultivated agricultural use and likely to support similar plant and wildlife habitat types. The reduced land demand for urban development associated with the GSA MOU Amendment Alternative would lessen potentially significant direct and indirect impacts of the proposed project on special-status plant and/or wildlife species or their habitats, but would not substantially lessen the impact. This alternative is superior to the proposed project for its ability to lessen biological resources impacts.

**Climate Change**

The proposed project has a significant unavoidable impact on climate change. Like criteria air emissions as described above, GHG emissions volumes from mobile sources (primarily cars and trucks) typically represent the largest percentage of the GHG emission inventory for land use projects. Indirect GHG emissions created by burning fossil fuel to produce electricity consumed by a project and from combusting natural gas consumed by a project (e.g. for space heating) are generally lesser GHG emissions volume sources. Therefore, GHG emissions from projects that generate fewer vehicle trips can generally be assumed to generate fewer air emissions than
projects with higher vehicle trip volumes (as the difference typically translates into fewer overall vehicle miles traveled (VMT). As described in the Transportation section below, total trip volume from this alternative is assumed to be similar to that of the proposed project. Therefore, the GHG emissions characteristics of each regarding mobile sources would be similar.

Both the GSA MOU Amendment Alternative and the proposed project are also assumed to generate similar volumes of GHG emissions due to electricity demand and natural gas consumption. This owes to the fact that the total Retail square footage of building development capacity for both remains the same; electricity demand and natural gas demand are likely to be similar.

With mobile, indirect (electricity based) and direct (natural gas consumption) assumed to be similar with the GSA MOU Amendment Alternative, this alternative would also have a significant unavoidable impact on climate change and it would be equivalent to the proposed project from a climate change impact perspective.

**Cultural Resources**

The proposed project would have significant, but mitigatable cultural resources impacts. Neither Target Area N nor Target Area K contains recorded historical or unique archaeological resources. Like much of the land with and adjacent to the City, the Target Areas are located within areas of medium to high sensitivity for the presence of cultural resources based on information contained in Section 3.6, Cultural Resources. The GSA MOU Amendment Alternative would avoid land disturbance on 27 fewer acres that would the proposed project. Therefore, it would lessen the potentially significant impacts of the proposed project, but not substantially. The GSA MOU Amendment Alternative would still result in significant, mitigatable impacts within the remainder of the Target Areas, but is superior to the proposed project from a cultural resources impact perspective.

**Geology and Soils**

As described in Section 3.7, Geology and Soils, the California Supreme Court recently held in the 2015 “California Building Industrial Association (CBIA)” case that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents. Prior to the CBIA case, CEQA analyses of potential geology and soils impacts of a project typically focused on existing geologic hazards that have potential to cause risk to public health and safety. Subsequent to this case, exposure to existing geologic hazards conditions is generally not considered under CEQA unless a proposed project has potential to exacerbate existing geologic hazards conditions and increase risks to structures and public safety. While Section 3.7 includes these analyses, they are included only for informational
purposes and the information is to be considered outside the purview of CEQA. As described in Section 4.0, Cumulative Impacts, development within the Target Areas is not expected to exacerbate existing geologic hazards conditions.

This alternative would avoid development on the approximately 27 acres of land. Therefore, this alternative would reduce potential risks associated with exposure of structures and people to existing geologic hazards, but not substantially relative to development that would occur within the remaining Target Areas. This alternative is considered to be equivalent to the proposed project from a geology and soils effects perspective.

**Hazards and Hazardous Materials**

The proposed project has potentially significant, but mitigatable impacts regarding potential exposure to agricultural chemical residues and to aerially deposited lead in soils. There are no known hazardous materials conditions within either Target Area N or Target Area K. Both Target Areas have similar potential to contain hazardous soils conditions due to the historic and continued application and storage of agricultural chemicals. Hazards impacts from relocating Retail development capacity to Target Area K would avoid potential for exposure to agricultural chemical residues, if present, within the 27 acres total acres that would not be developed under this alternative. This lessens the overall potentially significant impact, but not substantially. The impact remains potentially significant, but mitigatable. Target Area N is not expected to contain soils with potential contamination with lead; this alternative would not substantially lessen this impact as associated with the proposed project.

This alternative is superior to the proposed project from a hazardous materials conditions perspective for its ability to lessen potentially significant impacts from exposure to agricultural chemical residues in soils.

**Hydrology and Water Quality**

The hydrology and water quality impacts of the proposed project are less than significant. The GSA MOU Amendment Alternative would lessen several hydrology and water quality effects. The relocation of Retail development capacity from Target Area N to Target Area K would result in 27 fewer acres of agricultural land being converted to urban use. Impervious surface area would be reduced, with a corresponding incremental reduction on loss of groundwater recharge. Reduced potential for soil erosion during construction is possible due also to the reduced area of land conversion. The GSA MOU Alternative would be superior to the proposed project for its ability to further lessen hydrology and water quality effects.
Land Use and Planning

The GSA MOU Amendment Alternative eliminates a component of the proposed project (development within Target Area N) that would conflict with the GSA MOU. Therefore, this alternative would reduce inconsistencies of the proposed project with the GSA MOU and through so doing, lessen a range of environmental impacts of the proposed project. LAFCO approvals to amend the City’s SOI and to allow annexation of Target Areas B, F, L2, and K would still be required.

Noise

Proposed project impacts from exposure of development within specific Target Areas to traffic noise is significant, but mitigatable; impacts from generation of traffic noise and its effects on sensitive receptors are significant and unavoidable; and impacts of exposure of people and structures to groundborne vibration is significant, but mitigatable. The GSA MOU Amendment Alternative would avoid exposure of development within Target Area N to traffic noise that exceeds General Plan applicable standards; reduce traffic volumes in the vicinity of Target Area N that could in turn lessen traffic noise impacts on noise sensitive uses in that area; and avoid potentially significant impacts of groundborne vibration on residents living adjacent to Target Area N and/or buildings in the immediate area of Target Area N. These impacts of the proposed project would be lessened, but not substantially because there is no change in development capacity with this alternative and only a five percent decrease in developed land area.

While this alternative would concentrate a greater intensity of Retail use within Target Area K, related stationary noise sources, if included in future development, would be located at greater distance from existing noise sensitive residential areas than would similar noise sources near Target Area N. Effects of an increase in traffic generation from development within Target Area K would be contingent on the traffic distribution. To be conservative, it is assumed that this alternative does not avoid or substantially lessen the significant unavoidable traffic noise impacts of the proposed project.

Due to the this alternative’s potential to lessen several potentially significant noise impacts of the proposed project associated with Target Area N, it would be superior to the proposed project from a noise impact perspective.

Police and Fire Services

The proposed project was found to have unknown impacts from construction of fire service facilities and no impact from construction of police facilities. Demand for fire and police services for this alternative would be similar to the proposed project, as this alternative results in the same level of development with potential to require these services. Like the proposed project, no new
facilities would be required and this alternative would also have unknown impacts and no impacts from construction of fire and police facilities, respectively. This alternative is equivalent to the proposed project regarding police and fire facility impacts.

**Population and Housing**

Like the proposed project, this alternative includes no new residential development capacity and as such, would have no direct effects related to housing development or population. Effects of this alternative are equivalent to those of the proposed project.

**Transportation**

The proposed project has unavoidable impacts on County and Caltrans road segments. While myriad variables affect the analysis of transportation impacts of new development, at the most general, land use plan level of analysis, traffic generation can be used as a proxy for comparing the relative potential impacts of land use plan options. The higher the vehicle trip volumes generated by an option, the greater the potential that operational performance of circulation facilities and networks could be impacted by the traffic volume increase.

The Target Area N Retail use was included in the proposed project in significant part to capture potential demand for retail uses from commuters traveling the State Route 68 between Salinas and the Monterey Peninsula. To the extent that new development within Target Area N were to successfully function in this capacity, it could reduce vehicle trip volumes by enabling commuters to avoid independent trips to retail uses that may be located in other parts of the City and/or in locations on the Monterey Peninsula; it could function to capture “pass-by” trips and reduce trip origins.

Though the GSA MOU Amendment Alternative would result in higher traffic generation from Target Area K, that increase could be somewhat moderated by increasing the mix of uses within Target Area K. This has potential to result in increased internal trip capture, as people employed within this area would have increased retail offerings available to them. Their need to make independent trips outside the Target Area to meet their needs for retail oriented uses could be diminished. Nevertheless, to be conservative, it is assumed that this alternative would, at a minimum, also likely result in significant and unavoidable traffic impacts on County road segments. It is assumed that impacts on the City road network could be less than significant through payment of the City’s TFO impact fee. Significant unavoidable impacts on Caltrans controlled roadway facilities are also possible if impacted roadways are not included in the TAMC Regional Fee program. Specific impacts would need to be assessed through a traffic impact analysis.

Given the above noted factors, the GSA MOU Amendment Alternative and the proposed project are assumed to be equivalent from a transportation impact perspective.
Wastewater

Impacts of the proposed project regarding wastewater are less than significant. The GSA MOU Amendment Alternative would not result in a net change in development capacity relative to the proposed project. Wastewater generation from the alternative is expected to be similar to that of the proposed project. As described in Section 3.13, Wastewater, no need to construct new wastewater conveyance or treatment facilities is expected due to the proposed project itself. This would also be the case for the GSA MOU Amendment Alternative. Therefore, the GSA MOU alternative would be equivalent to the proposed project from a wastewater impact perspective.

Water Supply

The proposed project has a net beneficial impact on the impacted Salinas Groundwater Basin by increasing water in storage. This results from conversion of agricultural land with its more intensive water demand requirements to urban uses with lower water demand requirements. The GSA MOU Amendment Alternative would not result in a net change in development capacity relative to the proposed project, but would result in less “groundwater beneficial” conversion of agricultural land to urban use, as 27 fewer acres of agricultural land would be converted to urban use. This alternative would, nevertheless, have a beneficial impact on groundwater overdraft conditions, but the benefit would be lessened relative to the proposed project.

Relationship to Proposed Project Objectives

The GSA MOU Amendment Alternative largely attains the objectives for the proposed project. In particular, the employment generation potential of the proposed project would be retained by relocating the Retail building development capacity proposed in Target Area N to Target Area K. This alternative would also improve economic diversification and expansion within the City. This alternative would not conflict with the City’s ability to attain the other project objectives.

Alternative 3: GSA MOU Consistency

The GSA MOU between the City and County is summarized in 2.4.1, Land Use Pattern and Potential for Change. As described in Alternative 2 – GSA MOU Amendment Alternative, the County has raised concerns about the proposed project in its comments on the NOP and in subsequent communications with the City. The County’s primary concern is about the relationship of specific components of the proposed project with the GSA MOU.
Description

Alternative 3 – GSA MOU Consistency reflects changes in the proposed project that would be required to ensure that it is fully consistent with limits on City growth that are articulated in the GSA MOU. This alternative is evaluated to reflect conditions should the County determine that it is unwilling to amend the GSA MOU to enable the project to proceed as proposed or to proceed with GSA MOU amendments identified in Alternative 2 – GSA MOU Amendment. Under Alternative 3, the project would be modified to eliminate Target Areas N, K, F, and B from the proposed project.

The elements of the proposed project that would be retained with this alternative include new development capacity as proposed within Target Area L2 and Target Area V. Figure 24, Alternative 3 – GSA MOU Consistency, illustrates that Target Areas L2 and V would remain unchanged with this alternative.

With the above-noted modifications, Table 7, Distribution of Land Demand to EOAs Located Outside the SOI found in Section 2.4.1, Land Use Pattern and Potential for Change, would be modified as shown below in Table 50, Alternative 3 – GSA MOU Consistency Building Development Capacity. Table 50 shows the building development capacity that would remain with elimination of Target Areas N, K, F, and B. The 558 acres of gross land demand within the Target Areas assumed for the proposed project would be reduced by 427 acres, or about 77 percent. The total building capacity of 5,255,959 square feet within the Target Areas would be reduced by 3,824,781 square feet, or about 73 percent, with a correspondingly similar substantial percentage decrease in employment generation potential. Further, the diversity of employment opportunities would be substantially limited, as only Retail employment growth opportunity would remain; new employment potential in the industrial and business park sectors would be eliminated. A total of 427 acres that is largely in agricultural use would be retained in that use rather than converted to urban uses.

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<td>V</td>
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<td>Total</td>
<td></td>
<td>189</td>
<td>131</td>
<td>1,431,178</td>
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</table>

Source: EMC Planning Group 2017
Proposed Target Areas N, K, F, and B are deleted in this alternative.

Source: City of Salinas 2014, Monterey County GIS Database 2010, Esri 2015

Figure 24
GSA MOU Consistency Alternative
Salinas Economic Development Element Program EIR
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The general environmental effects of the GSA MOU Consistency Alternative relative to the proposed project are summarized below.

**Aesthetics**

The GSA MOU Consistency Alternative would result in reduced aesthetic impacts from a change in visual character given that it would result in a 77 percent reduction in land acreage that would be converted from agricultural to urban use. In particular, this alternative would avoid the significant unavoidable impacts of the proposed project associated with a substantial change in visual character from development of Target Areas B and K. The residual impact from development of Target Areas L2 and V would be less than significant.

This alternative is superior to the proposed project from an visual character impact perspective.

**Agricultural Resources**

With the GSA MOU Consistency Alternative, 427 acres of Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) included in Target Areas N, K, F, and B would be retained in agricultural use rather than converted to urban use. The Important Farmland that would be retained constitutes 85 percent of the total of 502 acres of Important Farmland that would be lost with the proposed project. This alternative would avoid the significant unavoidable impacts of the proposed project from loss of farmland within these Target Areas and substantially lessen the significant unavoidable impact of the proposed project. However, loss of farmland within Target Areas L2 and V would remain as a significant unavoidable impact.

This alternative would also avoid the significant, but mitigatable impact of the proposed project from conflict with an agricultural conservation easement associated with Target Area B and would substantially lessen the proposed project impact. This impact as associated with development of Target Area V would remain significant, but mitigatable. In addition, the potentially significant, but mitigatable impact of facilitating conversion of agricultural land to non-urban use associated with proposed development of Target Areas N, K, F, and B would be avoided. The overall project impact would be substantially lessened, but would remain potentially significant, but mitigatable for proposed development associated with Target Areas L2 and V.

For the reasons noted above, this alternative is superior to the proposed project from an agricultural resources impact perspective.


**Air Quality**

The proposed project has significant, but mitigatable impacts related to generation of particulate matter during construction. Other air quality effects are less than significant or the project has no impact. For land use development projects, criteria air emissions from mobile sources (primarily cars and trucks) typically represent the largest percentage of the air emissions inventory of such projects. Indirect air emissions created by burning fossil fuel to produce electricity consumed by a project and from combusting natural gas consumed by a project (e.g. for space heating) are generally lesser emissions volume sources. By eliminating 3,824,781 square feet of building development capacity and the associated substantial increase in traffic generation from such development, mobile source air emissions would substantially decline with this alternative. Similarly, area source and energy source related air emissions would decline substantially relative to the proposed project. In addition, the potential for exposure of sensitive receptors to elevated pollutant concentrations at newly congested intersections (intersections that operate below acceptable LOS standards) could be decreased, as impacts on the performance of the road network would be substantially reduced relative to the proposed project. By eliminating 427 acres from potential for development, this alternative avoids the potentially significant, mitigatable impacts of the proposed project related to generation of particulate matter during construction within Target Areas N, K, F, and B and substantially lessens this impact. This impact would remain as associated with development of Target Areas L2 and V.

This alternative is superior to the proposed project from an air quality impact perspective.

**Biological Resources**

The proposed project has significant, but mitigatable impacts on biological resources including special-status plants and wildlife within multiple Target Areas, on wetlands within Target Area V, and natural communities within Target Area V. This alternative would eliminate urban development on 427 acres of primarily agricultural land within Target Areas N, K, F, and B. Though agricultural land typically is not considered valuable habitat for most special status species, it nevertheless would have higher habitat value than land that is converted to urban use. This alternative would avoid significant, but mitigatable impacts on special-status plants and wildlife with potential to occur within these Target Areas and would substantially lessen the overall project impact. This alternative would not avoid or substantially lessen significant, but mitigatable impacts on special-status species that may occur within Target Areas L2 or V, or substantially lessen significant, but mitigatable impacts on wetlands or natural communities with potential to occur only within Target Area V.

The GSA Consistency Alternative is superior to the proposed project for its ability to substantially lessen significant biological resources impacts.
Climate Change

The proposed project has a significant, unavoidable impact on climate change. Like criteria air emissions as described above, GHG emissions volumes from mobile sources (primarily cars and trucks) typically represent the largest percentage of the GHG inventory of land development projects. Indirect GHG emissions created by burning fossil fuel to produce electricity consumed by a project and from combusting natural gas consumed by a project (e.g. for space heating) are generally lesser GHG emissions volume sources. Therefore, projects that generate fewer vehicle trips can generally be assumed to generate fewer GHG emissions than projects with higher vehicle trip volumes. With approximately 73 percent less building development capacity, this alternative would result in a substantial reduction in vehicle trip generation and a substantial reduction in mobile source GHG emissions relative to the proposed project. Similarly, it would result in a substantial reduction in area source and energy source GHG emissions relative to the proposed project. Thus, this alternative would substantially lessen the significant unavoidable impact of the proposed project on climate change.

Due to the uncertainty about whether future development within Target Areas L2 and V will exceed thresholds of significance applicable to it at the time development is proposed and/or whether significant impacts can be reduced to less than significant, it is conservatively assumed that this impact would remain significant and unavoidable for this alternative.

Nevertheless, this alternative is considered to be superior to the proposed project for its ability to substantially lessen the significant unavoidable project impact on climate change.

Cultural Resources

The proposed project would have significant, but mitigatable cultural resources impacts, and significant, but mitigatable impacts on paleontological resources. With a 77 percent reduction in land area that would be converted to urban use relative to the proposed project, the potential for this alternative to impact historical and/or unique archaeological resources and paleontological resources within Target Areas F, B, N, and K, if present, would be avoided. Potentially significant, but mitigatable impacts from development of Target Areas L2 and V would remain with this alternative. This alternative would substantially lessen impacts of the proposed project on these resources.

This alternative is considered to be superior to the proposed project for its ability to substantially lessen impacts on cultural resources and paleontological resources.

Geology and Soils

As described in Section 3.7, Geology and Soils, the California Supreme Court recently held in the 2015 “California Building Industrial Association (CBIA)” case that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on
a project’s future users or residents. Prior to the CBIA case, CEQA analyses of potential geology and soils impacts of a project typically focused on existing geologic hazards that have potential to cause risk to public health and safety. Subsequent to this case, exposure to existing geologic hazards conditions is generally not considered under CEQA unless a proposed project has potential to exacerbate existing geologic hazards conditions and increase risks to structures and public safety. While Section 3.7 includes these analyses, they are included only for informational purposes and the information is to be considered outside the purview of CEQA. As described in Section 4.0, Cumulative Impacts, development within the Target Areas is not expected to exacerbate existing geologic hazards conditions.

With a 77 percent reduction in land area that would be converted to urban use relative to the proposed project, this alternative would substantially lessen potential risks associated with exposure of structures and people to existing geologic hazards. This alternative is considered to be superior to the proposed project from a geology and soils effects perspective.

Hazards and Hazardous Materials

The hazards and hazardous materials effects of the proposed project include potentially significant, but mitigatable impacts from exposure to agricultural chemical residues in soils and exposure to aerially deposited lead in soils located adjacent to U.S. Highway 101. This GSA MOU Consistency Alternative would substantially lessen these impacts by avoiding disturbance of 427 acres of land within Target Areas F, B, N, and K that is largely in agricultural use and all of the land within these Target Areas that is located adjacent to U.S. Highway 101. The significant, but mitigatable impacts would remain as associated with proposed development within Target Areas L2 and V. This alternative is considered to be superior to the proposed project for its ability to substantially lessen potentially significant project impacts to public health and safety from exposure to hazards and hazardous materials.

Hydrology and Water Quality

The hydrology and water quality impacts of the proposed project are less than significant. Because it would result in conversion of 427 fewer acres of agricultural land to urban use, the GSA MOU Consistency Alternative would reduce the hydrology and water quality effects of the proposed project. Less-than-significant impacts associated with development of Target Areas L2 and V would remain. This alternative is considered to be superior to the proposed project from a water quality perspective for its ability to reduce potential for adverse water quality effects.

Land Use and Planning

The GSA MOU Consistency Alternative is designed to avoid all conflicts with the GSA MOU. It was crafted in based on input from the Monterey County Resource Management Agency. This
alternative would eliminate the inconsistencies of the proposed project with the GSA MOU and through so doing, substantially lessen a range of environmental impacts of the proposed project. LAFCO approvals to amend the City’s SOI and to allow annexation of Target Area L2

**Noise**

Proposed project impacts from exposure of development within specific Target Areas to traffic noise is significant, but mitigatable; impacts from generation of traffic noise and its effects on sensitive receptors are significant and unavoidable; and impacts of exposure of people and structures to groundborne vibration is significant, but mitigatable. The GSA MOU Consistency Alternative would substantially lessen these impacts of the proposed project. With elimination of Target Areas N, K, F, and B, potential for development within these Target Areas to be exposed to elevated traffic noise levels would be avoided, but potentially significant impacts would remain for Target Areas L2 and V. Generation of traffic noise would be substantially reduced due to a substantial reduction in traffic generation, but this impact is conservatively assumed to remain significant and unavoidable as associated with effects of noise generated by traffic from development within Target Areas L2 and V. Impacts associated with groundborne vibration would also remain as associated with development of these two Target Areas. This alternative is considered to be superior for its ability to substantially lessen significant noise and vibration impacts.

**Police and Fire Services**

The proposed project was found to have unknown impacts from construction of fire service facilities and no impact from construction of police facilities. Demand for fire and police services would substantially decline under the GSA MOU Consistency Alternative due to a 73 percent reduction in development capacity potential and the related potential need for new fire and/or police services facilities to serve the proposed project would decline. Like the proposed project, this alternative would also have unknown impacts and no impacts from construction of fire and police facilities, respectively. This alternative is equivalent to the proposed project regarding police and fire facility impacts.

**Population and Housing**

Like the proposed project, the GSA MOU Consistency Alternative includes no new residential development capacity and as such, would have no direct effects related to housing development or population. Effects of this alternative are equivalent to those of the proposed project.

**Transportation**

The proposed project has unavoidable impacts on County and Caltrans road segments. While myriad variables affect the analysis of transportation impacts of new development, at the most
general, land use plan level of analysis, traffic generation can be used as a proxy for comparing the relative potential impacts of land use plan options. The higher the vehicle trip volumes generated by an option, the greater the potential that operational performance of circulation facilities and networks could be impacted by the traffic volume increase.

This alternative would result in 73 percent less building development capacity than the proposed project. The proposed project would generate approximately 82,922 daily vehicle trips. The volume of traffic generated by this alternative would decline by roughly 60,500 trips per day with the reduction in building development capacity. Circulation impacts would be more limited in geographic scope and traffic would be generated from only two, rather than six Target Areas. Until such time as traffic impact analyses are prepared for future development within Target Areas L2 and V, it would be speculative to conclude that this alternative avoids all of the significant mitigatable and/or significant and unavoidable traffic impacts of the proposed project. Therefore, it is conservatively assumed that this alternative would also result in significant and unavoidable impacts on County and/or Caltrans road segments, but that impacts on City facilities and Caltrans U.S. Highway 101 facilities can be mitigated through payment of traffic fees through the City's TFO program and TAMC Regional Fee program, respectively. Nevertheless, it is highly likely that this alternative will avoid and/or substantially many of the significant, but mitigatable, and the significant and unavoidable impacts of the proposed project. This alternative is superior to the proposed project from a traffic and circulation impact perspective.

**Wastewater**

Impacts of the proposed project regarding wastewater are less than significant. The GSA MOU Consistency Alternative would result in a substantial reduction in wastewater generation relative to the proposed project. As described in Section 3.13, Wastewater, no need to construct new wastewater conveyance or treatment facilities is expected due to the proposed project itself. This would also be the case for the GSA MOU Consistency Alternative. This alternative is equivalent to the proposed project form a wastewater effects perspective.

**Water Supply**

The proposed project has a net beneficial impact on the impacted Salinas Groundwater Basin by increasing water in storage. This results from conversion of agricultural land with its more intensive water demand requirements to urban uses with lower water demand requirements. The GSA MOU Consistency Alternative would result in substantially reduced net demand for groundwater relative to the proposed project given its substantially reduced development capacity. As a result, this alternative would result in less “groundwater beneficial” conversion of agricultural land to urban use. Therefore, the net beneficial effect of this alternative would be
substantially lower than for the proposed project, but would remain beneficial. The GSA MOU Consistency Alternative is equivalent to the proposed project given its beneficial impact on groundwater overdraft.

**Relationship to Proposed Project Objectives**

The GSA MOU Consistency Alternative would not attain the proposed project objective of providing new land capacity to meet the City’s projected long-term demand for new employment generation through General Plan buildout; only 23 percent of the required land capacity for this purpose is included in this alternative. This alternative may not attain the objective of reducing land costs as it may not provide sufficient land supply to reduce land costs. Further, this alternative does not attain the objective of improving economic diversification because it provides only for additional Retail development capacity. Other project objectives would generally be attained.

**Alternative 4 – Target Area V Alternative**

The EDE identifies Carr Lake as a key economic development and quality of life driver for the potential it holds to anchor local and regional recreation uses in the center of the City. The Retail development capacity placed within Target Area V is designed to accomplish two significant goals: 1) provide opportunities to develop recreation oriented and/or recreation supporting uses, and 2) generate revenues for the City to help support infrastructure and/or other improvements in Carr Lake that can catalyze investments.

This Target Area V alternative proposes a land use designation change and a development envelope change that applies only within Target Area V as a basis to avoid and/or substantially lessen site specific impacts of increasing land supply within the Target Area location as included in the proposed project. All other elements of the proposed project would remain the same. The features of this alternative are as follows:

- relocate a 79-acre portion of Target Area V, represented by the southeastern most of the two polygons included in the Target Area, to an alternative location within Carr Lake adjacent to Laurel Drive. The 79-acre portion of Target Area V would be retained at the alternative location.

- change the proposed land use designation for Target Area V from Retail to Mixed Use with a limitation that residential development is not a permitted use. The environmental benefits of this change are related to reducing vehicle trip generation and reducing related environmental effects. The change would also provide enhanced flexibility for economic development whose tax benefits can be used to offset costs for infrastructure improvements that catalyze the City’s recreation destination vision for Carr Lake as expressed in the EDE.
Figure 25, Target Area V Alternative, reflects the changes noted above. The net development capacity of 810,448 square feet of building capacity included in Target Area V for the proposed project would be retained as would the total of 115 acres included in the Target Area. The Mixed Use land use designation permits a mix of retail, office, and/or residential use. It is assumed for purposes of this alternative that Target Area V would be developed with a sufficient mix and intensity of retail and professional/office uses such that the employment generating capacity of Target Area V assumed for the proposed project would also be retained. To maximize the potential to meet employment generation needs, it is also assumed that this alternative does not include residential uses. The general impacts of the Target Area V Alternative relative to the proposed project are summarized below.

Aesthetics

The proposed project results in significant unavoidable impacts associated with development of Target Areas B and K. The Target Area V Alternative not avoid or substantially reduce these impacts as neither pertain to Target Area V. Relocation of a portion of the Target Area would not result in new significant impacts. This alternative is equivalent to the proposed project from an aesthetics perspective. The scale of development is assumed to be similar to that of the proposed project.

Agricultural Resources

This alternative would convert a similar number of acres of agricultural land to urban use as would the proposed project, and its impact would remain significant and unavoidable. The proposed project conflict with Williamson Act contracted land would be substantially lessened, as the relocation of a portion of Target Area V would eliminate a conflict with a parcel of land under Williamson Act contract. A conflict with development of Target Area B would remain, so this impact of this alternative would remain significant, but mitigatable. The significant, but mitigatable impact of the proposed project regarding facilitating conversion of agricultural land to non-agricultural use would remain with this alternative. This alternative is superior to the proposed project for its ability to substantially lessen a significant impact associated with conflict with Williamson Act zoning.

Air Quality

The proposed project has significant, but mitigatable impacts related to generation of particulate matter during construction. Other air quality effects are less than significant or the project has no impact. This Target Area V Alternative does not reduce the land area that would be graded during construction as this alternative simply relocates an equivalent acreage of developable land. This alternative would not avoid or substantially lessen this impact of the proposed project.
Figure 25

Target Area V Alternative

Source: City of Salinas 2014, Monterey County GIS Database 2010, Esri 2015

Salinas Economic Development Element Program EIR
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For land use development projects, criteria air emissions from mobile sources (primarily cars and trucks) typically represent the largest percentage of the air emissions inventory of such projects. Indirect air emissions created by burning fossil fuel to produce electricity consumed by a project and from combusting natural gas consumed by a project (e.g. for space heating) are generally lesser emissions volume sources. Therefore, projects that generate fewer vehicle trips can generally be assumed to generate fewer air emissions than projects with higher vehicle trip volumes. As described in the Transportation section below, the Target Area V Alternative has potential to incrementally reduce daily vehicle trips associated with the proposed project due to the higher internal trip capture exhibited by mixed use projects than by more uniform development types (e.g., commercial centers). Consequently, this alternative also could result in a minor reduction in criteria air emissions volumes relative to the proposed project. This alternative is equivalent to the proposed project from an air quality impact perspective as it would not avoid or substantially lessen significant air quality impacts of the proposed project.

**Biological Resources**

The proposed project has significant, but mitigatable impacts on biological resources including special-status plants and wildlife within multiple Target Areas, on wetlands within Target Area V, and natural communities within Target Area V. This alternative relocates an approximately 79-acre portion of Target Area V that is mapped in Figure 12 in this EIR as being within freshwater emergent wetland to a location along Laurel Drive that is substantially outside of this protected habitat type. Based on the general biological resources reconnaissance and research conducted for the proposed project, freshwater emergent wetland may only occur within proposed Target Area V. Therefore, this alternative substantially lessens the impact of the proposed project on freshwater emergent wetland. Other biological resources impacts of the proposed project would not be avoided or substantially lessened with this alternative and would remain significant, but mitigatable. This alternative is superior to the proposed project for its ability to substantially lessen impacts on protected wetland habitat.

**Climate Change**

The proposed project has a significant, unavoidable impact on climate change. Like criteria air emissions as described above, GHG emissions volumes from mobile sources (primarily cars and trucks) typically represent the largest percentage of the GHG inventory of land use projects. Indirect GHG emissions created by burning fossil fuel to produce electricity consumed by a project and from combusting natural gas consumed by a project (e.g. for space heating) are generally lesser GHG emissions volume sources. Therefore, projects that generate fewer vehicle trips can generally be assumed to generate fewer GHG emissions than projects with higher vehicle trip volumes. As described in the Transportation section below, total trip volume from
6.0 Alternatives

this alternative is assumed to be incrementally lower than that of the proposed project. While the Target Area V alternative may result in a small reduction in mobile source GHG emissions relative to the proposed project, it is likely to generate similar volumes of indirect GHG emissions from electricity and natural gas consumption demand and to generate a similar overall volume of GHG emissions. Therefore, the impact of this alternative on climate change would remain significant and unavoidable and its climate change impacts would be equivalent to the proposed project.

Cultural Resources

The proposed project would have significant, but mitigatable cultural resources impacts. There are no historical resources or unique archaeological resources, or know paleontologic resources recorded within Target Area V or within the alternative Target Area V development footprint. However, it is possible that such resources exist within the alternative footprint area. Therefore, this alternative would not avoid or substantially lessen the significant, but mitigatable impacts of the proposed project. This alternative is equivalent to the proposed project from a cultural resources and paleontological resource impact perspective.

Geology and Soils

As described in Section 3.7, Geology and Soils, the California Supreme Court recently held in the 2015 “California Building Industrial Association (CBIA)” case that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents. Prior to the CBIA case, CEQA analyses of potential geology and soils impacts of a project typically focused on existing geologic hazards that have potential to cause risk to public health and safety. Subsequent to this case, exposure to existing geologic hazards conditions is generally not considered under CEQA unless a proposed project has potential to exacerbate existing geologic hazards conditions and increase risks to structures and public safety. While Section 3.7 includes these analyses, they are included only for informational purposes and the information is to be considered outside the purview of CEQA. As described in Section 4.0, Cumulative Impacts, development within the Target Areas is not expected to exacerbate existing geologic hazards conditions.

This alternative would not substantially lessen potential risks associated with exposure of structures and people to existing geologic hazards. This alternative is considered to be equivalent to the proposed project from a geology and soils effects perspective.

Hazards and Hazardous Materials

The hazards and hazardous materials effects of the proposed project are either less than significant or potentially significant, but mitigatable. This alternative would not avoid or
substantially lessen the potentially significant, but mitigatable impact of the proposed project regarding risks to public health from exposure to residual agricultural chemical in soils; much of the alternative Target Area footprint has historically been in agricultural use. The risk for exposure during construction in this area would remain potentially significant, but mitigatable. This alternative lessens the potentially significant, but mitigatable impact from risk of exposure to aerially deposited lead because the alternative Target Area footprint is located approximately 3,500 feet from U.S Highway 101 where no related risk would occur. However, this risk would remain within the remainder of the Target Areas such that the impact remains potentially significant, but mitigatable. This alternative is superior to the proposed project from a hazards and hazardous materials perspective for its ability to lessen the aerially deposited lead impact.

**Hydrology and Water Quality**

The hydrology and water quality impacts, including flood hazard impacts, of the proposed project are less than significant. Target Area V is located both within a flood hazard zone and a regulatory floodway. Flood hazard impacts of the proposed project associated with Target Area V are reduced to less than significant through required compliance of future development with the City's flood management regulations. However, this alternative relocates a portion of the Target Area V footprint to a location that is largely outside of both the flood hazard zone and the regulatory floodway. The new location was selected based on information contained in a study entitled *Carr Lake Floodplain Modification Analysis* (RBF Consulting 2007). That analysis included investigation into options for flood and floodplain management within Carr Lake. Figure 26, *Carr Lake Flood Study*, shows areas within Carr Lake that are above the 100-year flood elevation (as well as the regulatory floodway) and areas that could be raised above that elevation as part of a conceptual design approach for flood hazard management. The alternative development footprint contains about 38.8 acres that are both above the flood elevation and outside of the regulatory floodway, and 40.5 acres that could be raised above the flood elevation.

This alternative does not avoid or substantially lessen a significant impact. However, by relocating a significant portion of the future development capacity within Target Area V to a location that is partially outside of a flood hazard zone and regulatory floodway, this alternative reduces exposure of future development within Target Area V to flood hazards and better complies with the City's flood management regulations. For this reason, this alternative is considered to be superior to the proposed project from a hydrology and water quality perspective.

**Land Use Planning**

This alternative affects the only Target Area within the city limits. As such, its development is not addressed in the GSA MOU and does not give rise to inconsistencies with the GSA MOU.
Noise

Proposed project impacts from exposure of development within specific Target Areas to traffic noise is significant, but mitigatable; impacts from generation of traffic noise and its effects on sensitive receptors are significant and unavoidable; and impacts of exposure of people and structures to groundborne vibration is significant, but mitigatable. The Target Area V Alternative would retain the development capacity for this Target Areas as included in the proposed project. Traffic volumes and traffic noise levels from this alternative would be similar to the proposed project such that significant and unavoidable traffic noise impacts of the proposed project would not be avoided or substantially lessened; the significant and unavoidable impact would remain. Without site specific information, it would speculative to assume that significant, but mitigatable impacts from exposure of outdoor areas within retail uses in the alternative Target Area V location would be avoided or substantially lessened; it is assumed this impact remains potentially significant, but mitigatable. The alternative Target Area V location is not adjacent to developed land uses. Therefore, the impact of this alternative from exposing people or structures to groundborne vibration would be lessened relative to the proposed project, but not substantially. This alternative is equivalent to the proposed project from a noise impact perspective.

Population and Housing

Like the proposed project, this alternative includes no new residential development capacity and as such, would have no direct effects related to housing development or population. Effects of this alternative are equivalent to those of the proposed project.

Police and Fire Services

The proposed project was found to have no impact from construction of police facilities and unknown impacts from construction of fire service facilities. Demand for police services and fire services would be the same under this alternative as for the proposed project. This alternative is equivalent to the proposed project regarding police and fire facility impacts.

Transportation

The proposed project has unavoidable impacts on County and Caltrans road segments. Myriad variables affect the analysis of transportation impacts of new development. At the most general, land use plan level of analysis, traffic generation can be used as a proxy for comparing the relative potential circulation impacts of land use plan options. The higher the vehicle trip volumes generated by an option, the greater the potential that the operational performance of existing circulation facilities and networks could be adversely impacted by the traffic volume increase.
Area currently out of floodplain (based on 48.25’ contour)

Potential area removed from floodplain

Area in floodplain

Potential roadway improvements

Main steam/channel

Flow control structure

Source: RBF 2007

Figure 26

Carr Lake Flood Study

Salinas Economic Development Element Program EIR
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Mixed use projects have potential to generate fewer vehicle trips than projects containing uniform end use types (e.g., predominantly retail end uses). Mixing land use types within the same project enables users of one land use type to take advantage of the close proximity of other land use types to meet more of their daily functional needs within close proximity to their place of employment or home. In the case of the Target Area V Alternative, office use employees and/or visitors would be able to access land uses meeting a portion or perhaps most of their average daily functional needs (e.g., shops, grocery stores, restaurants, commercial services, etc.) within the same project site. Conversely, employees and customers of retail oriented type uses would have access to professional services as well as commercial services. This breadth of choice reduces the need for employees and visitors to make additional, independent vehicle trips to other destinations to meet their functional needs. In summary, mixed use projects have higher rates of internal trip capture than do developments containing more uniform end use types.

Internal trip capture from mixed use project commonly ranges from about five to 15 percent. If an internal trip capture rate of 10 percent is applied to the 21,897 daily trip generation volume assigned to Target V in Table 8 of the TIA found in Appendix I of this EIR, this alternative would reduce trip generation by about 2,190 trips per day relative to the proposed project. While the shift in land use type from Retail to mixed use would likely reduce total trip volumes associated with this alternative, the reduction represents less than three percent of the proposed project daily trip volume. Therefore, this alternative is likely to have similar impacts as the proposed project – County and Caltrans facilities would be significantly and unavoidably impacted, but impacts on City facilities and Caltrans' U.S. Highway 101 segments would be less than significant with payment of impact fees per the City's TFO and TAMC's Regional Fee program, respectively. This alternative would not likely avoid or substantially lessen significant, but mitigatable, or significant and unavoidable impacts of the proposed project. Given the above noted factors, this alternative and the proposed project are assumed to be equivalent relative to impacts on the performance of the affected road network.

**Wastewater**

Impacts of the proposed project regarding wastewater are less than significant. The Target Area V Alternative retains similar development capacity within the modified Target Area V as is included in the proposed project. No significant change in wastewater generation or treatment demand is anticipated such that this alternative would also have less-than-significant environmental impacts from the need to construct new wastewater treatment facilities. This alternative and the proposed project are equivalent from this environmental impact perspective.

**Water Supply**

The proposed project has a net beneficial impact on the Salinas Groundwater Basin by increasing water in storage. This results from conversion of agricultural land with its more
intensive water demand requirements to urban uses with lower water demand requirements. The Target Area V Alternative would not result in a net change in development capacity relative to the proposed project and would result in conversion of a similar acreage of agricultural land relative to the proposed project. The impact of this alternative on the groundwater basin would also be beneficial. This alternative is equivalent to the proposed project from a groundwater impact perspective.

**Relationship to Proposed Project Objectives**

This alternative attains the objectives of the proposed project. In particular, the employment generation potential of the proposed project would be retained by retaining a similar level of employment generation potential. This alternative would also improve economic diversification and expansion within the City. This alternative would not conflict with the City’s ability to attain the other project objectives.

### 6.5 Alternatives Comparison and Environmentally Superior Alternative

**Comparison of Alternatives**

Pursuant to CEQA Guidelines section 15126.6(a), an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The significance of effects of the No Project/No Development, GSA MOU Amendment, GSA MOU Consistency, and Target Area V alternatives relative to the proposed project are summarized [Table 51](#), Summary of Alternatives Impacts Relative to the Proposed Project. Where the proposed project has no impact relative to a particular environmental topic, that effect is not included in the table. For informational purposes, less than significant impacts of the proposed project are included in the table, as in some cases, project alternatives have potential to reduce even less than significant environmental effects; this information is considered to be worth noting. As Section 15126.6(a) requires investigation of alternatives that avoid or substantially lessen the significant impacts of the proposed project, Table 51 focuses only on whether an alternative has potential to avoid or substantially lessen potentially significant impacts or significant and unavoidable impacts of the proposed project. Where an alternative substantially lessens or avoids a significant or significant unavoidable impact of the proposed project, this is denoted in boldface font.
Table 51  Summary of Alternatives Impacts Relative to the Proposed Project

**Boldface** font denotes alternatives with potential to substantially lessen or avoid significant, but mitigatable and/or significant unavoidable proposed project impacts.

<table>
<thead>
<tr>
<th>Impact</th>
<th>Proposed Project</th>
<th>No Project/No Development</th>
<th>GSA MOU Amendment</th>
<th>GSA MOU Consistency</th>
<th>Target Area V</th>
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</thead>
<tbody>
<tr>
<td><strong>Aesthetics</strong></td>
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<tr>
<td>Change in Visual Character</td>
<td>Significant and Unavoidable</td>
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<td>Significant and Unavoidable</td>
<td><strong>Substantially Lessen</strong> -</td>
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<td><strong>Agricultural Resources</strong></td>
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<td>Conversion of On-site Important Farmland</td>
<td>Significant and Unavoidable</td>
<td><strong>Substantially Lessen</strong> -</td>
<td>Significant and Unavoidable</td>
<td><strong>Substantially Lessen</strong> -</td>
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<tr>
<td>Conflict with Williamson Act Zoning/Agricultural Conservation Easements</td>
<td>Less than Significant with Mitigation</td>
<td><strong>Substantially Lessen</strong> -</td>
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<tr>
<td>Conversion of Off-site Important Farmland</td>
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<tr>
<td><strong>Air Quality</strong></td>
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<tr>
<td>Particulate Emissions from Construction Activities</td>
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<td>Less than Significant with Mitigation</td>
<td><strong>Substantially Lessen</strong> -</td>
<td>Less than Significant with Mitigation</td>
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<td><strong>with Mitigation</strong></td>
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<td>Contribution to Non-Attainment Status for Particulate Emissions</td>
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## Alternatives

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<th>Impact</th>
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<th>GSA MOU Amendment</th>
<th>GSA MOU Consistency</th>
<th>Target Area V</th>
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<td>Less than Significant</td>
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### Biological Resources

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<th>Loss of Congdon’s Tarplant Population</th>
<th>Less than Significant with Mitigation</th>
<th>Substantially Lessen - Less than Significant with Mitigation</th>
<th>Less than Significant with Mitigation</th>
<th>Substantially Lessen - Less than Significant with Mitigation</th>
<th>Less than Significant with Mitigation</th>
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<tbody>
<tr>
<td>Loss of Tiger Salamander</td>
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<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
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<td>Loss of Burrowing Owl</td>
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<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
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<td>Loss of Nesting Birds</td>
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<td>Substantially Lessen - Less than Significant with Mitigation</td>
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<tr>
<td>Loss of Dusky-Footed Woodrat</td>
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<td>Loss of Bats</td>
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<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
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<td>Loss of Sensitive Natural Communities</td>
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<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
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<td>Loss of Wildlife Movement Corridors</td>
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<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
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<tr>
<td>Climate Change</td>
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<td>Generation of Significant GHG Emissions</td>
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<td>Substantially Lessen - Significant and Unavoidable</td>
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<td>Substantially Lessen - Significant and Unavoidable</td>
<td>Significant and Unavoidable</td>
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<td>Cultural Resources</td>
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<td>Adversely Affect Historical Resources and/or Unique Archaeological Resources</td>
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<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
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<td>Adversely Disturb Native American Human Remains</td>
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<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
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<tr>
<td>Adversely Affect Unique Paleontological Resources</td>
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<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
</tr>
<tr>
<td>Geology and Soils</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Risk to Public Safety and Structures - Seismic Shaking¹</td>
<td></td>
<td></td>
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1. EMC Planning Group Inc. 6-51
<table>
<thead>
<tr>
<th>Impact</th>
<th>Proposed Project</th>
<th>No Project/No Development</th>
<th>GSA MOU Amendment</th>
<th>GSA MOU Consistency</th>
<th>Target Area V</th>
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</thead>
<tbody>
<tr>
<td>Risk to Public Safety and Structures - Liquefaction&lt;sup&gt;1&lt;/sup&gt;</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>Soil Erosion during Construction and Operations</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
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<sup>1</sup>Impacts on future project residents and users is beyond the scope of CEQA. The proposed project would not exacerbate existing geologic hazard conditions with conformance to existing uniformly applied policies and regulations.

**Hazards and Hazardous Materials**

<table>
<thead>
<tr>
<th>Impact</th>
<th>Proposed Project</th>
<th>No Project/No Development</th>
<th>GSA MOU Amendment</th>
<th>GSA MOU Consistency</th>
<th>Target Area V</th>
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</thead>
<tbody>
<tr>
<td>Accidental Release of Hazardous Materials</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
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<tr>
<td>Exposure to Agricultural Chemical Residues in Soils</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
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<tr>
<td>Exposure to Aerially Deposited Lead in Soils</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
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<tr>
<td>Hazardous Materials Release within ¼ Mile of a School</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
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<tr>
<td>Interfere with Adopted Emergency Response Plan</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
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**Hydrology and Water Quality**

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<thead>
<tr>
<th>Impact</th>
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<th>No Project/No Development</th>
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<th>GSA MOU Consistency</th>
<th>Target Area V</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drainage Pattern Changes, Erosion, Surface Water Quality Degradation, Violation of Water Quality Standards</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
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<tr>
<td>Localized Flooding from Increased Storm Water Runoff</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Impact</td>
<td>Proposed Project</td>
<td>No Project/No Development</td>
<td>GSA MOU Amendment</td>
<td>GSA MOU Consistency</td>
<td>Target Area V</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------</td>
<td>------------------</td>
<td>---------------------------</td>
<td>-------------------</td>
<td>---------------------</td>
<td>---------------</td>
</tr>
<tr>
<td>Flood Hazards - Development within Target Areas F and V</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
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<tr>
<td>Risk of Dam Failure - Risks to Property and Public Safety</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
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**Noise**

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<th>GSA MOU Amendment</th>
<th>GSA MOU Consistency</th>
<th>Target Area V</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expose Development within Target Areas to Traffic Noise</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
</tr>
<tr>
<td>Generation of Stationary Source Noise Exceeding Standards</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Expose People/Structures to Groundborne Vibration</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
</tr>
<tr>
<td>Generate Traffic Noise – Permanent Noise Increase</td>
<td>Significant and Unavoidable</td>
<td>Substantially Lessen - Significant and Unavoidable</td>
<td>Significant and Unavoidable</td>
<td>Substantially Lessen - Significant and Unavoidable</td>
<td>Significant and Unavoidable</td>
</tr>
</tbody>
</table>

**Police Protection**

<table>
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<tr>
<th>Impact</th>
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<th>GSA MOU Amendment</th>
<th>GSA MOU Consistency</th>
<th>Target Area V</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Impacts from Construction of New Fire Protection Facilities</td>
<td>Unknown</td>
<td>Unknown</td>
<td>Unknown</td>
<td>Unknown</td>
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**Transportation**

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<th>GSA MOU Amendment</th>
<th>GSA MOU Consistency</th>
<th>Target Area V</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduce Level of Service on City Road Segments to Below Acceptable LOS D</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
<td>Substantially Lessen - Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
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### 6.0 Alternatives

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<th>GSA MOU Consistency</th>
<th>Target Area V</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduce Level of Service on County and Caltrans Road Segments to Below LOS D</td>
<td>Significant and Unavoidable</td>
<td>Substantially Lessen - Significant and Unavoidable</td>
<td>Significant and Unavoidable</td>
<td>Substantially Lessen - Significant and Unavoidable</td>
<td>Significant and Unavoidable</td>
</tr>
<tr>
<td>Reduce Level of Service on Caltrans U.S. Highway 101 Road Segments to Below LOS D</td>
<td>Less than Significant</td>
<td>Substantially Lessen - Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
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</table>

#### Wastewater

<table>
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<tr>
<th>Impact</th>
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</thead>
<tbody>
<tr>
<td>Expanded Wastewater Treatment Capacity Construction Resulting in Environmental Impacts</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
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#### Water Supply

<table>
<thead>
<tr>
<th>Impact</th>
<th>Proposed Project</th>
<th>Impact</th>
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</thead>
<tbody>
<tr>
<td>Increased Groundwater Demand Effect on Impacted Salinas Groundwater Basin</td>
<td>Beneficial</td>
<td>Beneficial - Significantly Reduced</td>
</tr>
</tbody>
</table>

EMC Planning Group Inc.
Environmentally Superior Alternative

Section 15126.6 (e) (2) of the CEQA Guidelines provides that “[i]f the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Here, the No Project/No Development Alternative is environmentally superior alternative because it would avoid or substantially lessen many of the significant and unavoidable impacts of the proposed project. Further, this alternative results in less building capacity and developed land area than any other alternative; all effects of this alternative would be reduced to a greater extent than for any other alternative. However, the No Project/No Development Alternative would achieve none of the project objectives. Of the remaining three alternatives, Alternative 3 – GSA MOU Consistency is the environmentally superior alternative. However, relative to the proposed project, the GSA MOU Consistency Alternative would not achieve several project objectives.
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7.0
REFERENCES AND REPORT PREPARERS

7.1 REPORTS AND RESOURCES


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7.2 ORGANIZATIONS AND PERSONS CONSULTED

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Matthews, Patrick. General Manager/CAO. Salinas Valley Solid Waste Authority. E-mail communication with Consultant, November 22, 2016.


Svensson, Doug. Applied Development Economics. E-mail communication with Consultant. October 14, 2015.


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