MONTEREY COUNTY HOUSING AND COMMUNITY DEVELOPMENT PLANNING 1441 SCHILLING PL 2ND FLOOR, SALINAS, CA 93901



1441 SCHILLING PL 2ND FLOOR, SALINAS, CA 9390 PHONE: (831) 755-5025/FAX: (831) 757-9516

BACKGROUND INFORMATION

Project Title:	Post Ranch Inn LLC & Onesimo Parcel C LLC		
File No.:	PLN160047		
Project Location:	47900 Highway 1, Big Sur		
Name of Property Owner:	Post Ranch Inn LLC & Onesimo Parcel C LLC		
Name of Applicant:	Laura Lawrence C/O Law Offices of Aengus L Jeffers, Agent		
Assessor's Parcel Number(s):	419-311-038-000 & 419-311-042-000		
Acreage of Property:	101.92 acres		
General Plan Designation:	Watershed & Scenic Conservation, Rural Community Center		
Zoning District:	Watershed Scenic Conservation/40 acres per unit, Design Control, Historic Resource, Coastal Zone [WSC/40-D- HR(CZ)] and Visitor Serving Commercial, Design Control, Historic Resource, Coastal Zone [VSC-D-HR(CZ)]		
Lead Agency:	HCD-Planning		
Prepared By:	Anna V. Quenga, Senior Planner		
Date Prepared:	March 24, 2021		
Contact Person:	Anna V. Quenga, Senior Planner		
Phone Number:	(831) 755-5175		

II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. Project Description:

The proposed project includes improvements to existing visitor serving facilities, employee facilities, and internal infrastructure facilities for the Post Ranch Inn resort (PRI). In 2002, a Combined Development Permit and General Development Plan (see subsequent discussion in Section II.B – Surrounding Land Uses and Environmental Setting and Source 16) was approved for PRI's total buildout, consisting of 40 visitor serving units and 44 employee housing units.

The project includes an amendment to the 2002 General Development Plan to allow improved operations desired by the applicant. The project does not include an increase to the total visitor serving or employee housing units. Instead, it would allow conversion of existing guest units to spa rooms, conversion of employee housing units to visitor serving units, and construction of new visitor serving units and employee housing units to reach the approved buildout limitation. In accordance with Monterey County Code requirements, a General Development Plan (GDP) shall demonstrate the long range development and operation of facilities, including expansion and new development, operational changes, infrastructure improvements and alternative development opportunities. As such, the proposed GDP amendment includes near-term (Current Phase) and long-term (Future Phase) facility improvements. The project application includes the required entitlements for the Current Phase development which is described below in 2 categories: "Structure Improvements" and "Infrastructure Improvements". Future Phase improvements are identified in the GDP amendment and are briefly discussed in this Initial Study. However, the applicant does not seek approval of the entitlements required for the development at this time. Instead, the need for permit approval and subsequent CEQA document, if required, is acknowledged (Source 1, General Development Plan illustrated on the Project Plans).

Overall, the Current Phase facility improvements will require site clearing, grading of 2,150 cubic yards of cut and 900 cubic yards of fill, and the removal 6 California bay laurel trees ranging from 12 inches to 25 inches in diameter, 1 Coast redwood 6 inches in diameter, and one stump 36 inches in diameter.

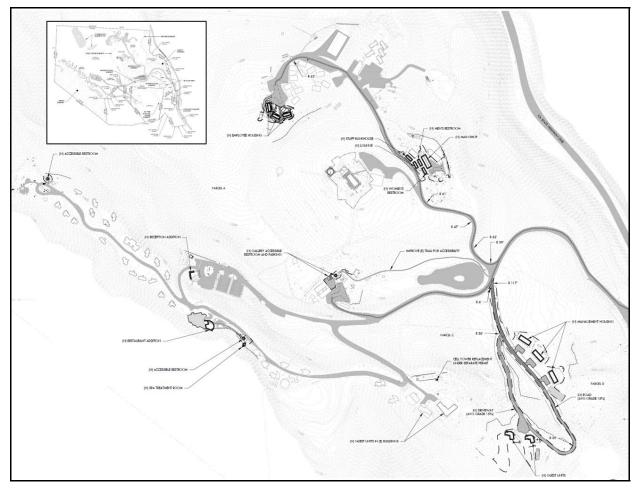


Figure 1. Overall Site Plan – Existing and Proposed Development

CURRENT PHASE STRUCTURAL IMPROVEMENTS

As illustrated in **Figure 2** below, structural improvements include construction of employee housing units, employee facilities (central services), guest units, 2 new ADA compliant restrooms and a reception building addition. The project also includes converting existing visitor serving units in the Butterfly Building into spa rooms and converting the Post House and Caretaker Unit from employee/management housing to visitor serving units. Only interior improvements are necessary for the Butterfly Building and no improvements to the Post House and Caretaker Unit are proposed.

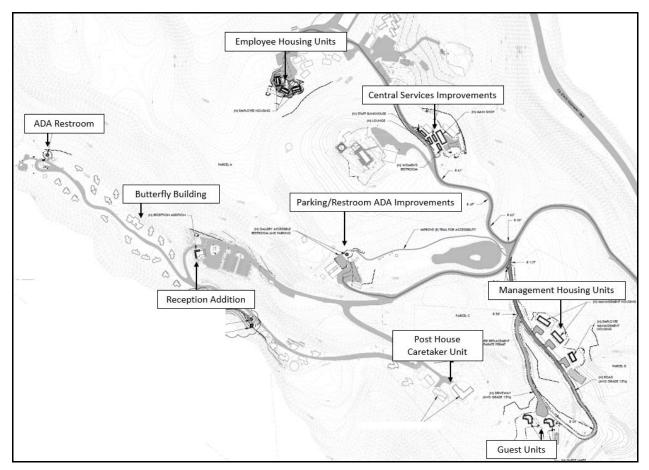


Figure 2. Current Phase Structure Improvements

Employee Housing

Buildout of PRI, approved in 2002, allowed a total of 44 employee housing units (20 existing units and the construction of 24 additional units). As required by the approval, the property owner entered into an Inclusionary Housing Regulatory Agreement and Declaration of Restrictive Covenant, which specifies that PRI will construct 20 "Market Rate" employee housing rental units and 4 low income employee rental units. As of the preparation of this Initial Study, only 12 of the 24 units were constructed and finaled (Source 18). Therefore, the project includes construction of the 12 remaining employee housing units consistent with the approved buildout and as agreed upon in the above documents. However, these units are proposed in a different location than what was approved in 2002.

Figure 3 below, illustrates where the additional employee units were approved and the proposed re-location of 6 employee housing units adjacent to the existing 20-units approved in 1989, 3 bunkhouse units and 3 manager housing units on Parcel C.

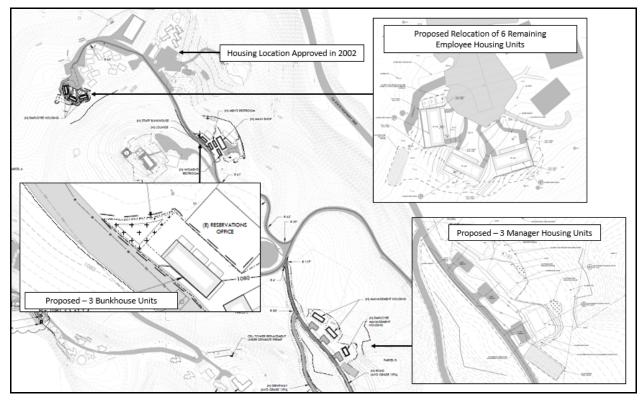


Figure 3. Proposed Employee Housing

The 6 employee housing units will be contained in 3 detached 2-story buildings. As illustrated in **Figure 4** below, the ground floor will contain a 2-bedroom unit while the second floor will contain a 1-bedroom unit. Each unit will contain a living room, dining area, kitchen and bathroom.

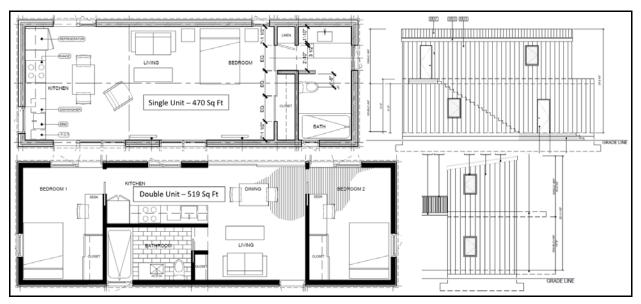


Figure 4. Proposed Employee Housing Units – Floor Plan and Elevations

The 3 manager units, **Figure 3**, will consist of 3 detached one-story buildings with a living room, kitchen, dining room, laundry room and 2 bedrooms. The Type 1 Manager unit contains 2 bathrooms and is approximately 1,104 square feet (see **Figure 5**). The Type 2 Manager unit contains 1 bathroom and is approximately 770 square feet (see **Figure 6**).

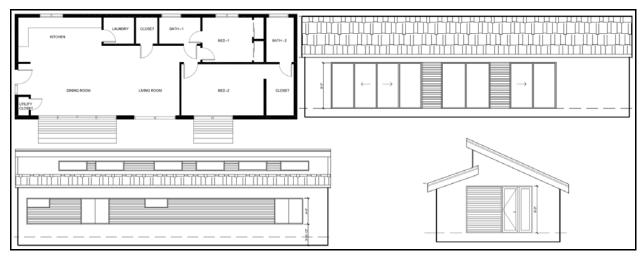


Figure 5. Proposed Type 1 Manager Units – Floor Plan and Elevations

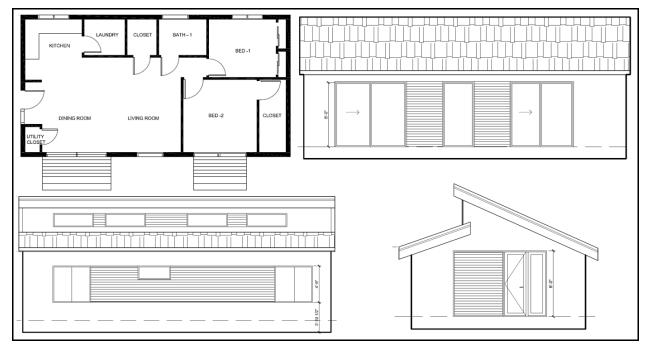


Figure 6. Proposed Type 2 Manager Unit – Floor Plan and Elevations

The 3 remaining employee housing units will be located in the "Central Services" area, see **Figures 3** and **7**. The bunkhouse will contain 3 separate sleeping quarters to provide overnight accommodations for employees that live off-site, but due to shifts or emergency situations, would need temporary lodging.

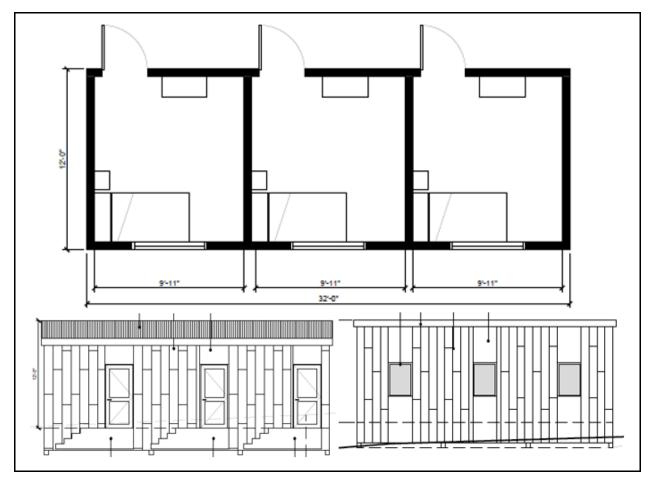


Figure 7. Proposed Bunkhouse – Floor Plan and Elevations

Employee Facilities – Central Services

The Central Service area of PRI, located in the northeast portion of Parcel A, is the area of the property where facilities essential for operating and maintaining the resort are sited (see **Figure 2**). These facilities include a proposed employee bunkhouse (as previously discussed) and existing maintenance, laundry, and staff recreation building, shipping and receiving building, cold storage building, a fire house, the reservations office, gas and diesel tanks, and staff parking areas. Trash and recycling staging areas are also located here.

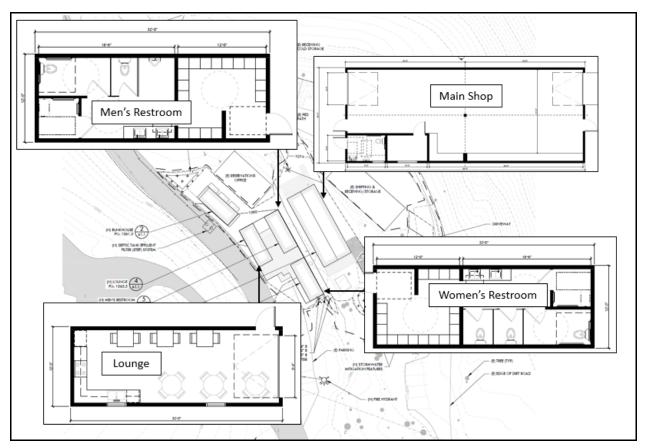


Figure 8. Proposed Central Services Buildings

The applicant proposes to improve this area to better meet the needs of the employees and improve upon site operation logistics. This includes construction of a new shop, men's restroom, women's restroom, lounge, and bunkhouse adjacent to the existing reservations office and shipping/receiving/storage buildings (see **Figure 8**).

Visitor Serving Units

Buildout for PRI approved in 2002 allowed a total of 40 visitor serving units, also referred to as "inn units". As of preparation of this Initial Study, all 40 visitor serving units have been constructed, consisting of the 30 existing units approved in 1989 (Monterey County File No. PC-6336, Resolution No. 89-176) and the 10 units approved in 2002 (Sources 16 and 19).

The application proposes to rearrange uses onsite to improve the visitor experience. This includes converting uses of existing buildings and the construction of new units. These improvements would not result in exceeding the approved 40 visitor serving unit buildout number.

The Butterfly Building (see **Figure 2**) was built as part of the original PRI approval as a multiple ground unit and contains 6 separate visitor serving units, 1 of which is currently being used for only spa services. In 2002, PRI was approved to construct a 4,700 square foot spa/yoga studio adjacent to the pool area and fitness center, administrative office, and mercantile building. The studio was never constructed and instead, this application proposes to provide spa services within the Butterfly Building. This would locate spa services adjacent to the majority of visitor units allowing easier access, as well as reduce development on the site. As illustrated in **Figure 9**

below, 3 more of the existing 5 unit visitor units in operation would be replaced by spa rooms with no overnight accommodations. This conversion would reduce PRI visitor serving units to 36.

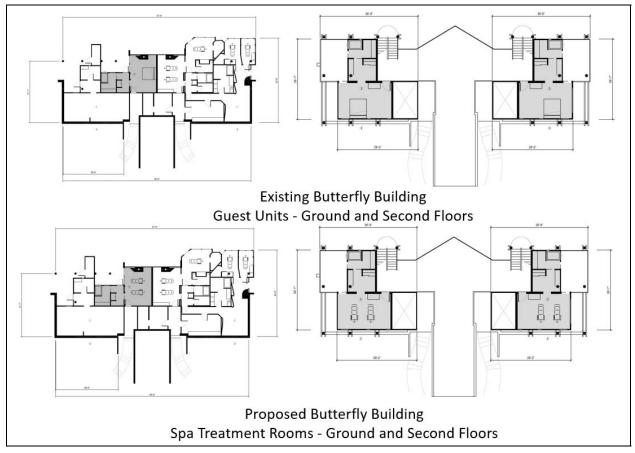


Figure 9. Visitor Units Proposed to Convert to Spa (Butterfly Building)

Parcel C contains the Post House (built and occupied by Bill and Luci Post, previous PRI proprietors, in 1970) and a caretaker's unit (approved by the Zoning Administrator on October 31, 1996, Monterey County File No. ZA95025) occupied by the PRI General Manager. The application proposes to convert these uses from residential to visitor serving units (see Figures 2 and 10). No interior or exterior modification of these structures is proposed. This conversion would increase PRI visitor serving units to 38.

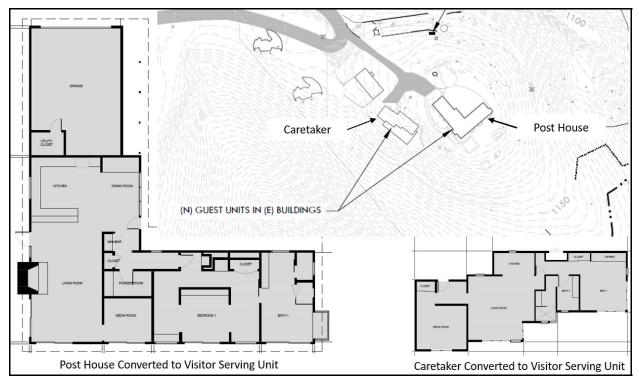


Figure 10. Post House and Caretaker Proposed to Convert to Visitor Serving Units

PRI proposes to construct 2 visitor serving units approximately 250-feet southeast of the Post House. As illustrated in **Figures 2 and 11** below, siting and design of the units would be consistent with the existing "Ocean" and "Cliff" units.



Figure 11. Proposed Guest Units

Other Resort Structures

In addition to employee housing and visitor serving units, the application proposes to improve upon the visitor experience by constructing a detached spa treatment building, 2 ADA compliant restrooms, and adding to the Reception Building and the Sierra Mar restaurant.

The Post Gallery, Art and Furniture Gallery, restroom, and Financial Office is located towards the center of Post Ranch. The application proposes to construct a detached ADA compliant restroom and ADA accessible parking spaces east of the galleries and north of the Financial Office (**Figures 2 and 12**). This restroom is identical to the one proposed adjacent to the spa room. The area of development is relatively flat and minor grading would be required to construct the improvements.

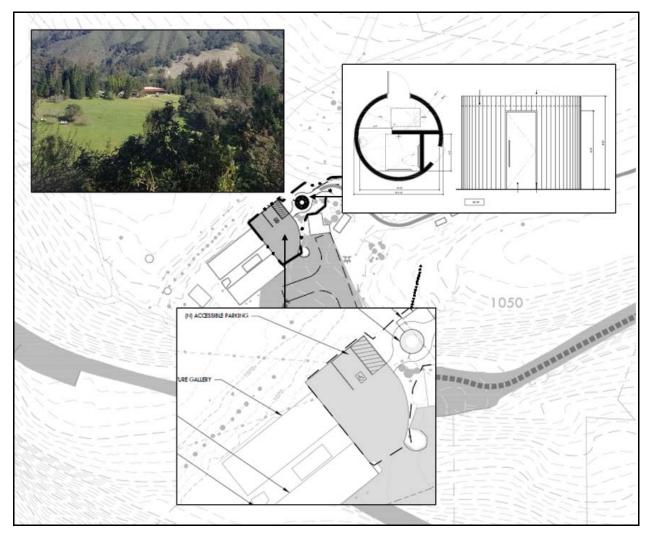


Figure 12. New ADA Compliant Restroom and Accessible Parking

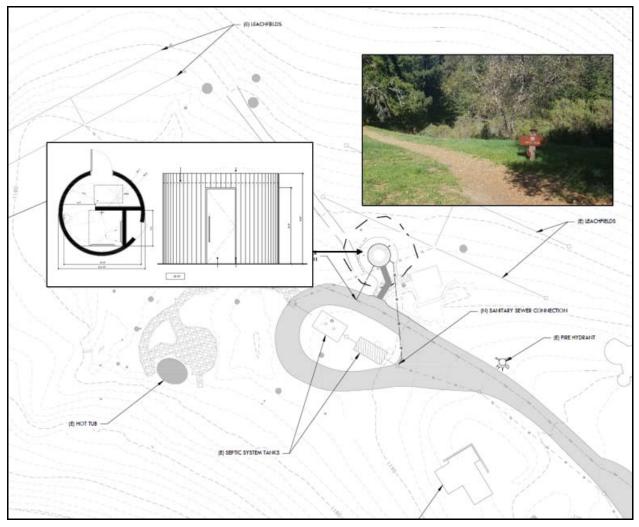


Figure 13. Proposed ADA Restrom Near Existing Hot Tub and Trail Head

The third ADA compliant restroom is proposed at the northwestern portion of the property, past the visitor serving units. This would provide restroom facilities at the confluence of a group of visitor units, an existing hot tub, and an existing walking trail (**Figures 2 and 13**). This restroom is identical to the two previously discussed and the area of development is relatively flat. Minor grading would be required to construct the improvements.

The reception building is located west of the Post Gallery and Art and Furniture Gallery. The application proposes to construct an addition to the lower floor (approximately 138 square feet) to house PRI's computer servers and provide additional storage room (**Figures 2 and 14**). The area of the addition is "L" shaped and was graded flat when the building was constructed.



Figure 14. Proposed Addition to Reception Building

CURRENT PHASE SITE AND INFRASTRUCTURE IMPROVEMENTS

Improvements to the resort's infrastructure include improving accessibility to public trails, constructing road and driveway for new management housing and visitor units, and making necessary upgrades to the water supply system (for potable water and fire suppression), wastewater treatment system, and stormwater facilities. Associated grading will be necessary to make the structure, site and infrastructure improvements. The preliminary civil plans (Source 1) indicate approximately 2,150 cubic yards of cut and 900 cubic yards of fill will be necessary for these improvements.

PRI contains an existing pedestrian trail connected to the PRI's main access road on the east, the Post Gallery and Art and Furniture Gallery to the west, and an existing pond to the south. See **Figure 15** below. The application proposes to improve this trail to meet ADA accessibility requirements. Reconfiguration and/or relocation is not proposed, but the improvement would require earth movement and placement of soil stabilizing material, not including asphalt.

Also illustrated in Figure 15, is a proposed road and driveway loop to access the proposed management housing and visitor serving units. As discussed in subsequent Section B -

Surrounding Land Uses and Environmental Setting of this Initial Study and as demonstrated in subsequent **Figure 30**, the existing condition of the area of proposed access is an unimproved gravel/dirt road.

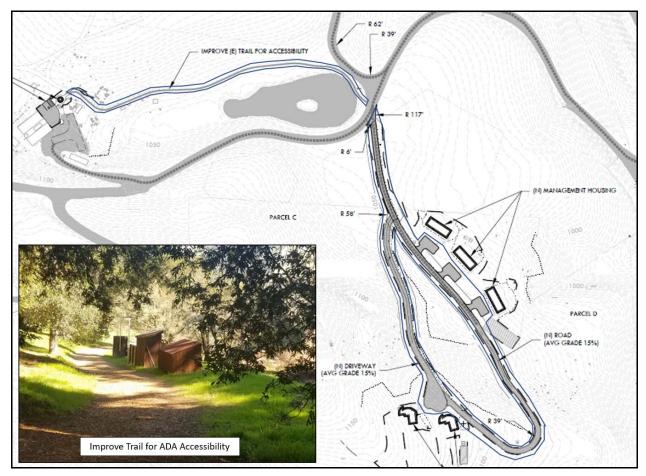


Figure 15. Circulation Improvements

From the point of connection off the existing roadway to the fork in the loop (approximately 200 linear feet), the roadway is proposed to contain an asphalt surface. No excavation is proposed for this segment and any leveling of the surface will be done through the placement of fill and compaction (Source 1).

Southwest of the fork, the access continues south and transitions from a roadway into a driveway which ends at a proposed turnaround and parking area for the 2 new visitor units (approximately 500 linear feet). This driveway will require grading to reduce the roadway to 15% grade or lower and will be covered with asphalt.

Southeast of the fork, the roadway continues south and then loops up northwest, connecting to the driveway turnaround (approximately 800 linear feet). This portion of the roadway provides employee access to Management Housing units and will be made of base rock and decomposed granite.

Existing potable water service at PRI is provided by a private water system and wastewater services is provided by 5 decentralized wastewater systems (see discussion in subsequent Section

B – Surrounding Land Uses and Environmental Setting of this Initial Study), the application proposes to connect the new structures into these systems (**Figure 16**).

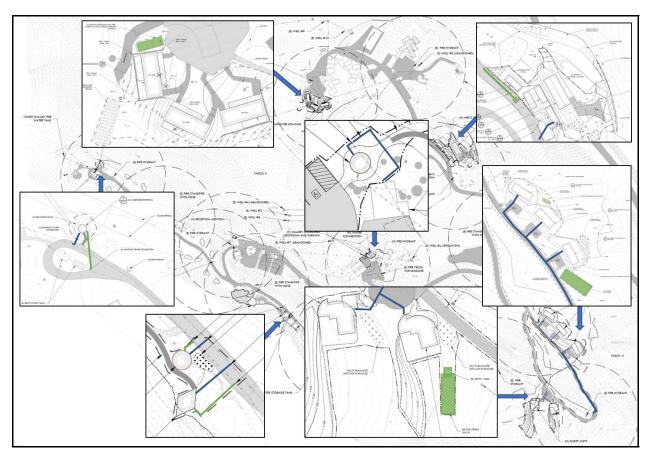


Figure 16. Potable Water and Wastewater Improvements

A water and wastewater capacity analysis report submitted with the project application (Carter, Source 13) concludes that the existing water system has the capacity to serve the estimated future water use at buildout. Thus, improvements are limited to connecting into and extending existing water lines (see blue colored lines identifying new waterlines in **Figure 16**).

In terms of the wastewater system, the report concludes that Wastewater System No. 3 (aka the "Boneyard") would serve the new employee housing and to accommodate the additional wastewater generated, an additional leachfield should be added to the existing system. A new septic tank effluent pump (STEP) system consisting of a 1,500 gallon septic tank, a 1,000 gallon pump tank, and 2,400 square feet of disposal area is needed to serve the management housing units. A standard septic tank and gravity leachfields are recommended to serve both proposed guest units. This would consist of a 1,500 gallon septic tank and a 400 square foot leachfield area. Wastewater improvements are identified by the green colored lines in **Figure 16**.

Additional improvements include installation of stormwater and drainage facilities, parking pads, driveways and walkways.

FUTURE PHASE FACILITY IMPROVEMENTS

The General Development Plan identifies the overall buildout of Post Ranch. As such, future improvements that will be constructed at a later date and require separate entitlements have been

included. As illustrated in **Figure 17** below, future improvements include construction a spa room, an ADA compliant restroom and an addition to the Sierra Mar restaurant.

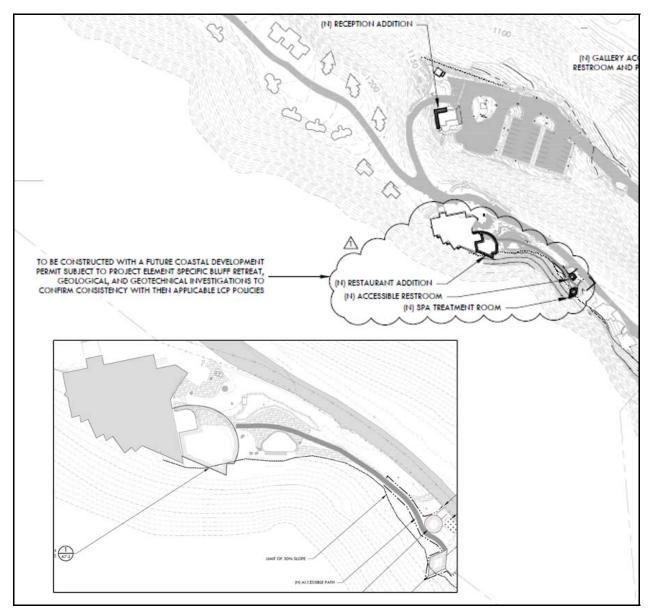


Figure 17. Future Phase Improvements

The detached spa building and adjacent ADA compliant restroom is proposed approximately 150-feet southeast of the Sierra Mar restaurant (see **Figures 17 and 18**). The diamond-shaped spa room would be approximately 108 square feet in size with a sloping roof (approximately 10%); height of the structure would be approximately 10-feet on the lower side (seaward) and 13-feet on the higher side (inland). Minor grading to create a building pad for the spa is proposed on slopes less than 30% the portion of the structure over steep slopes would be cantilevered. The new restroom is circular structure, approximately 95 square feet in size with a 5 square foot storage closet and less than 10-feet in height. The restroom contains a sink, urinal, and toilet. Minor grading would be required as it is sited on a relatively flat area. Colors and materials for both structures would match the existing buildings. As identified in the General Development

Plan (Source 1), the proposed detached spa building and restroom would occur as a Phase 2 of the development. As such, the development would require a separate discretionary permit entitlement and environmental review.

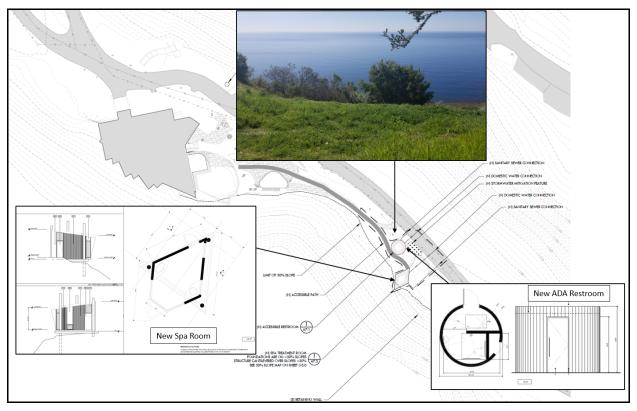


Figure 18. Proposed ADA Restroom and Spa Building

The Sierra Mar restaurant contains a patio/deck on the eastern portion of the structure (see **Figures 17, 19 and 20**). This area of the restaurant provides an informal dining area adjacent to the dining room and bar. Access to this area is gained through an existing door, limiting the flow between the two areas.



Figure 19. Existing Restaurant Deck

The application proposes to expand the formal dining area by utilizing the existing patio/deck (approximately 1,502 square feet) and creating a partial enclosure similar to a pergola. See **Figure 20** below. It would contain a canopy louvered roof with a heavy timber facia. The existing steel railing would be extended at the south (facing the ocean) and a "limited vision" partition made of redwood vertical siding would be constructed to the east. The restaurant service is limited to the guests of PRI and since the area of improvement is currently used as restaurant space, it would not result in an increase of allowed service.

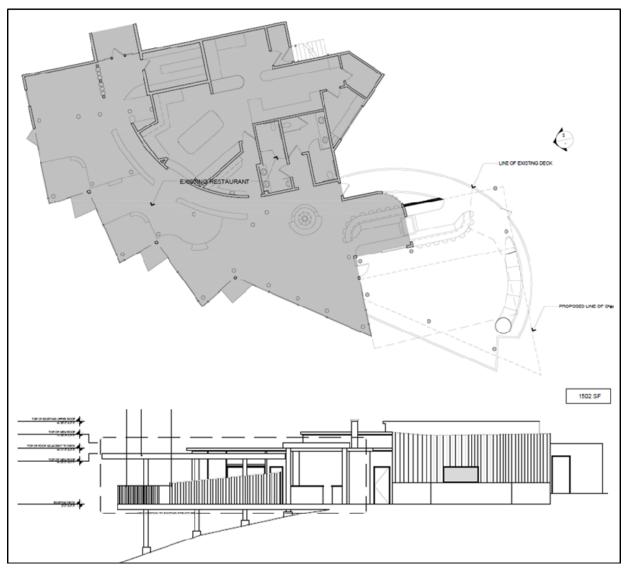


Figure 20. Proposed Restaurant Addition

B. Surrounding Land Uses and Environmental Setting:

This section of the Initial Study provides a brief background discussion on the property's history followed by a description of existing property conditions at the time preparation of this Initial Study commenced. The subject property is located at 47900 Highway 1, Big Sur, approximately 1 mile south of the intersection of Sycamore Canyon Road and Highway 1, west of the Post House and Ventana Inn (**Figure 21**).

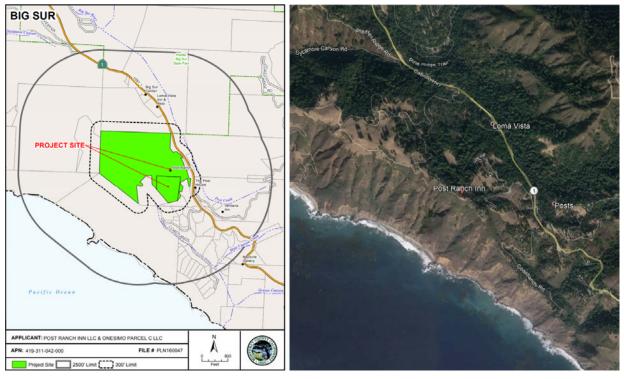


Figure 21. Project Vicinity

The project area is located on the western slopes of the Santa Lucia mountain range at the edge of the Pacific Ocean. The Post Ranch Inn complex is comprised of 3 legal lots of record (Parcels A, B and C as shown in Volume 21 Parcel Maps, Page 119) (Assessor's Parcel Numbers 419-311-038-000, 419-311-039-000 & 419-311-042) totaling approximately 116 acres in size (**Figure 22**). The proposed improvements are limited to parcels 419-311-038 and 042. Existing development; the entrance gate, reception building, guest units, garden/gallery, pools, central services, and water and wastewater facilities are located on Parcel A and the Post House and Caretaker Unit, a utility/wine bunker, irrigation water tanks, and wireless communication facilities are located on Parcel C.

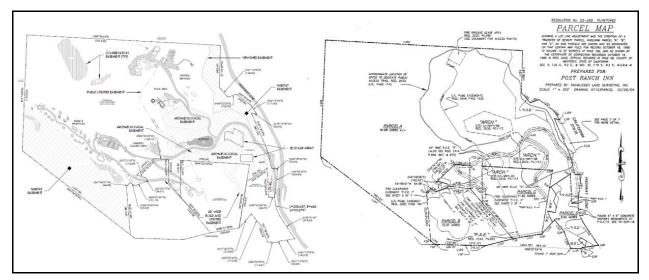


Figure 22. Post Ranch Inn Property

As illustrated in **Figure 23** below, Parcels A and C have 2 land use designations, Watershed & Scenic Conservation and Rural Community Center. The zoning designations for Parcel A are Visitor Serving Commercial with Design Control and Historic Resource overlays, coastal zone or "VSC-D-HR(CZ)" and Watershed Scenic Conservation, 40 acre minimum with Design Control and Historic Resource overlays, coastal zone or "WSC/40-D-HR(CZ)". Parcel C is zoned Watershed Scenic Conservation, 40 acre minimum with a Design Control overlay, coastal zone or "WSC/40-D(CZ)".

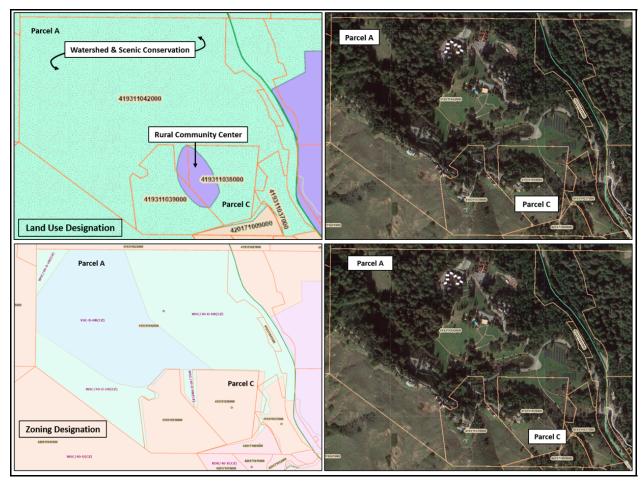


Figure 23. Land Use and Zoning Designations

BACKGROUND INFORMATION

The subject properties have been in use as a recreational resort for over 30 years. On May 31, 1989, the Monterey County Planning Commission certified the Post Ranch Inn Final EIR and approved a Coastal Development Permit (File No. PC-6336, Resolution No. 89-176) allowing establishment of Post Ranch Inn (PRI), see **Figure 24** below, consisting of 30 guest units (**Figure 25**), a small lodge and restaurant (**Figure 26**), reception lodge, conference room, pool house, pool and yurt, well and water storage, septic systems, storage supply building, mercantile building, woodshop, woodshed, 20 employee units (**Figure 27**), and a fire brigade building. The guest units were constructed north of the lodge and possess 4 different designs; individual ground units, double ground units, multiple ground units, and treehouse units.

This entitlement included a condition of approval (No. 28) requiring the applicant to rezone portions of Parcel A from VSC-D(CZ) to VSC-D-HR(CZ) and from WSC/40-D(CZ) to WSC/40-D-HR(CZ) for the protection of archaeological resources onsite¹.

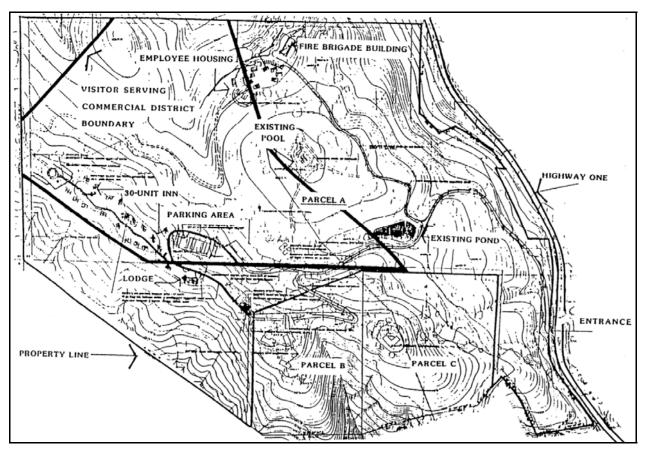


Figure 24. Site Plan Approved with Resolution 89-176

¹ See Monterey County Board of Supervisors Ordinance No. 5199.



Figure 25. Tree House Cabins



Figure 26. Sierra De Mar Restaurant and Pool Area



Figure 27. Existing Employee Housing

On June 25, 2002, the Monterey County Board of Supervisors adopted a Mitigated Negative Declaration and approved a Combined Development Permit and General Development Plan (File No. PLN970492, Resolution No. 02-269) allowing a minor subdivision and lot line adjustment; 10 new inn units; 24 new employee housing units; a yoga, exercise, and spa building; a mercantile and gallery; service building; maintenance shop; wastewater system improvements; grading; landscaping; habitat restoration and protection; relocation of parking areas; increase and improvement of public access trails and recreation areas; demolition of a pool, adjacent structures, and Quonset buildings; relocation of a firewood shed, and a 150,000 gallon water tank. See **Figures 28 and 29** below (Source 16). As a condition of approval to this permit, the property owner entered into an Inclusionary Housing Regulatory Agreement and Declaration of Restrictive Covenant (Document No. 2004108633) and an Inclusionary Housing Agreement (Document No. 2004108634) which specify that PRI will construct 20 "Market Rate" employee housing rental units and 4 low income employee rental units.

This entitlement included the creation of Parcel D which received a Transfer of Development Credit (TDC) from a donor parcel². This TDC facilitated the addition of 10 new inn units based on the residential development credit received from another donor parcel³.

² See Monterey County File No. PLN980453.

³ See Monterey County File No. PC95107.

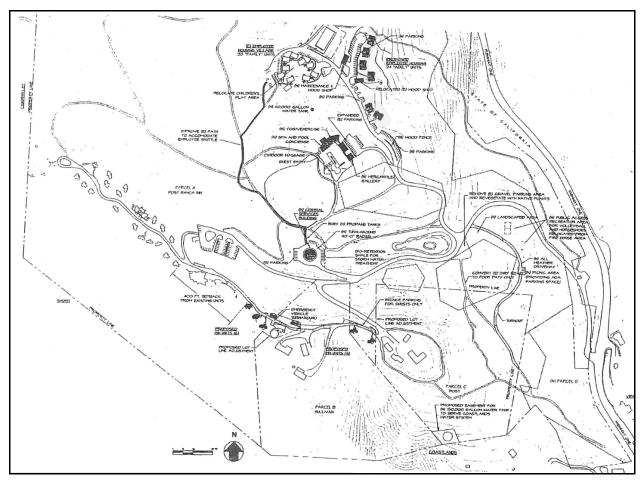


Figure 28. General Development Plan Approved with Resolution 02-269



Figure 29. Employee Housing and Visitor Unit Approved with Resolution 02-269

There is an existing dirt road that is proposed to be improved with asphalt to provide access to employee and visitor units(**Figure 30**). A portion of this road is shown as a road and utility easement on a portion of Parcels A and C (see Parcel Map in **Figure 31**).

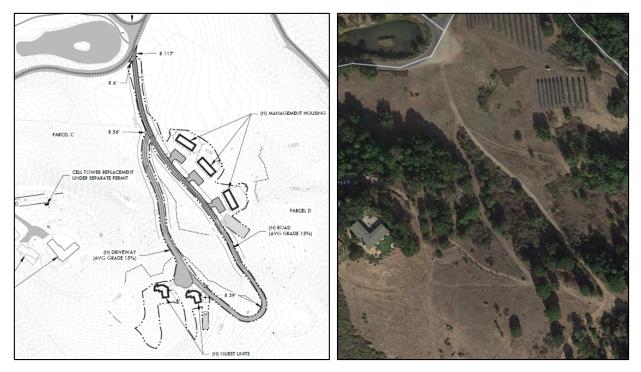


Figure 30. Existing Gravel Road Proposed for Improvement

EXISTING SCENIC RESOURCES

Portions of the subject properties identified to be located within the Critical Viewshed have been protected by a Viewshed Easement conveyed to the County (Reel 2630, Official Records, Page 1164) in accordance with Mitigation Measure No. 18 identified in the Post Ranch Final EIR (SCH No. 88041216) and adopted as Condition of Approval No. 1 of Planning Commission Resolution No. 89-176 (Monterey County File No. PC6336). See hatched area in **Figure 31** below.

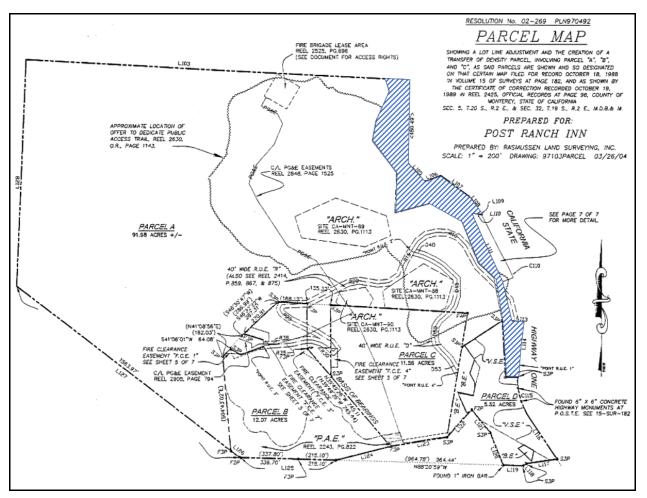


Figure 31. Parcel Map Showing Viewshed Easement on Parcel A

Except for the entrance into the complex, the existing development is sited and designed so they cannot be viewed from Highway 1.

EXISTING ENVIRONMENTALLY SENSITIVE HABITAT AREAS

Vegetation in the project area is characterized by Redwood Forest and riparian habitats. Oak woodlands, coast range grassland habitat can be found to the east (inland) and Coastal sage scrub, Northern Coastal scrub and Coastal bluff scrub are found to the west (coastal). The biological report identifies that proposed development would occur within 100 feet of Coastal Prairie grassland, Redwood forest habitat – including understory species, and Oak woodlands. In addition, development would occur in proximity of Seacliff buckwheat plants, host plant to Smith's blue butterfly, and a pond that provides habitat for California red-legged frog.

During review of the Combined Development Permit and General Development Plan (File No. PLN970492), development impacts to the endangered Smith's blue butterfly (*Eupholites enoptes smithi*)(SBB), by removal of approximately 0.003 acres of its habitat, and the threatened California red-legged frog (*Rana aurora draytonii*)(CRLF), by removal of 0.826 acres of its habitat, was identified. As such, the applicant was required to apply for an incidental take permit from the Fish and Wildlife Service pursuant to section 10(a)(1)(B) of the Endangered Species Act of 1973. A Habitat Conservation Plan (HCP) was prepared and submitted with the take permit application. The HCP, which fully describes the project and measures to minimize and

mitigate anticipated take of the SBB and CRLF and is incorporated in this Initial Study by reference (see Section VI.4. Environmental Checklist – Biological Resources of this Initial Study). In accordance with the Service's Habitat Conservation Planning Handbook, the HCP was determined to qualify as a "low-effect" plan. The incidental take permit was issued December 2006 for the duration of 20 years. In turn, the HCP is in effect for 20 years (Source 14). In compliance with the HCP, 2 non-contiguous portions of the subject property, totaling 36 acres are encumbered by a Perpetual Conservation Easement (Monterey County document No. 2006102245 recorded November 20, 2006) for the conservation and protection of SBB and CRLF habitat areas.

As recommended by the biologist (Source 16, Biological Report dated September 6, 2001 prepared by Jeff Norman), fire clearance zones adjacent to the Cliff Units were delineated on the Parcel Map. The HCP includes mitigations for impacts resulting from fire clearance activities within these zone. See further discussion on existing biological conditions in section VI.4. Environmental Checklist – Biological Resources, of this Initial Study.

EXISTING HAZARDS

Monterey County Geographic Information System (GIS) identifies the project area to be within a High Fire hazard area (Source 6). In addition, California Department of Forestry and Fire Protection's Fire Hazard Severity Zones in State Responsibility Areas map for Monterey County (Source 20) shows the subject property to be located within a State Responsibility Area with a Very High Fire Hazard Severity Zone. See further discussion on existing wildfire conditions in section VI.20. Environmental Checklist – Wildfires, of this Initial Study.

Monterey County GIS data indicates geologically related hazards within the property includes: relatively unstable uplands; a low, moderate and high landslide risk; and moderate and high erosion potential. Further, the San Gregorio and Sierra Hill faults are located off-site but near the eastern boarder of the property (Source 6). See further discussion on existing geological conditions in section VI.7. Environmental Checklist – Geology and Soils, of this Initial Study.

EXISTING ARCHAEOLOGICAL/TRIBAL CULTURAL RESOURCES

Portions of the subject properties identified to contain archaeological resources were placed within an Archaeological Easement and conveyed to the County through a conservation deed (Reel 2630, Official Records, Page 1113) in accordance with Mitigation Measure No. 57 identified in the Post Ranch Final EIR (SCH No. 88041216) and adopted as Condition of Approval No. 29 of Planning Commission Resolution No. 89-176 (Monterey County File No. PC6336). The Archaeological Easement areas are also delineated in the Parcel Map filed in Volume 21, Parcel Maps, Page 119. See further discussion on existing archaeological and tribal cultural conditions in sections VI.5 and 18. Environmental Checklist – Cultural Resources and Tribal Cultural Resources, of this Initial Study.

C. Other public agencies whose approval is required:

The Project is entirely within the jurisdiction of the County of Monterey. However, the project would be subject to appeal by and to the California Coastal Commission. As discussed in section VI.4. Environmental Checklist – Biological Resources, of this Initial Study, the project would be consistent with the requirements of an approved Habitat Conservation Plan. Pursuant to section 10 of the HCP, activities necessitating an amendment to the HCP require approval by the US Fish and Wildlife Service. Ministerial construction permits would be required through the

Monterey County Building Division, where review and approval by Cal Fire, HCD-Public Works, Environmental Health, and HCD-Environmental Services Division would also occur.

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

Use the list below to indicate plans applicable to the project and verify their consistency or nonconsistency with project implementation.

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

General Plan/Local Coastal Program LUP

The project was reviewed for consistency with the 1982 Monterey County General Plan (General Plan), the Big Sur Coast Land Use Plan (BSC LUP), and Monterey County Coastal Implementation Plans (CIP), Part 1 (Title 20) and Part 3 (Big Sur CIP). The intent of the General Plan is to maintain and enhance the County's rural character, natural resources, and economic base by providing for adequate residential, agricultural, commercial and industrial growth in areas best suited for the respective development. The BSC LUP North Section Map and Detail A, shows portions of PRI within areas with land use designations of "Watershed and Scenic Conservation" or "WSC" and "Rural Community Center" or "RRC". The purpose/objective of the WSC classification is to protect watersheds, streams, plant communities, and scenic values. Recreational facilities permitted within the Outdoor Recreation designation, including inns or lodging units and associated employee housing are secondary uses allowed in the WSC. On-site dining facilities are allowed based on association with inn units must be limited to that which is needed to serve on-premises overnight guests (see BSC LUP section 5.3.1.2). RRC is a special land use designation intended to accommodate areas where a variety of land use activities (inns, restaurants, service station, and commercial uses) exist and to provide and support the continuation of these functions for both the visiting public and residents of the adjoining rural areas. RRC also provides a mechanism to allow new uses compatible with existing development but not specifically listed as an allowed use in the underlying zoning district. As such, section 5.4.3.E of the BSC LUP states that any use allowed in any zone is appropriate in an RCC and commercial uses should be directed to existing Rural Community Centers. BSC LUP Table 1: Land Use and Development Intensity and Buildout, identifies a maximum of 300 visitor accommodation units allowed in the plan area. Inns are allowed in the WSC and RCC designations with a 10-acre minimum parcel size and a maximum cluster of 30-units. As described in section II.A - Project Description of this Initial Study, buildout of PRI was approved at 40 visitor serving units and the proposed project consists of conversion of uses in existing structures and relocation of approved, but not yet constructed, visitor serving units. Therefore, the number of visitor serving uses established was already accounted for in the previous entitlement. This is also the case with employee housing units. Line 1.c(2) of BSC LUP, Table 1 identifies that at full buildout of the LUP, there would be an estimated 300 (ranging between 0 - 650+) additional "commercial-employee housing" units located in the RCC, WSC and outdoor recreation land use designations. Table 1 does not specify the overall density standard; instead, density shall be specified in a housing plan required for each project (Source 1). The previous entitlement approved the buildout of 44 employee housing units and the proposed project includes their relocation but maintains the maximum amount approved. Consistency with other applicable BSC LUP policies are also discussed in section IV -Environmental Checklist, of this Initial Study. (Sources: 1, 2, 3, 4, 5, 6, and 8) CONSISTENT

Air Quality Management Plan

Consistency with the Air Quality Management Plan (AQMP, Source 8) is an indication of a project's ability to avoid contributing to a cumulative adverse impact on regional air quality (ozone levels), and is not an indication of project specific impacts, which are evaluated according to the Air District's adopted thresholds of significance. Inconsistency with the AQMP is considered a significant cumulative air quality impact. The Monterey Bay Air Resources District (MBARD) prepared the AQMP for the Monterey Bay Region to address attainment and maintenance of State and Federal ambient air quality standards with the North Central Coast Air Basin. The project includes residential development (employee housing) consistent with the amount approved for PRI in 2002. Therefore, implementation of the project would not result in a population increase not already accounted for in the AOMP. The MBARD CEOA Air Ouality Guidelines (Source 7) defines construction activities with potentially significant impacts for PM₁₀ if they include 2.2 acres of disturbance per day. The project would involve less than 2.2 acres of disturbance, and therefore would not result in a significant impact and would be consistent with the AQMP (see project description in previous Section II of this Initial Study). Additional discussion can be found in Section VI.3 – Air Quality, in this Initial Study. (Sources: 1, 7, and 8) CONSISTENT

Water Quality Control Plan

The subject property lies within Region 3 of the Central Coast Regional Water Quality Control Board (CCRWQCB). Water quality objectives specified in the Water Quality Control Plan for the Central Coastal Basin are intended to protect existing high quality waters of the state to protect present and future beneficial uses enumerated in Chapter Two of the plan. These objectives are achieved through establishment of waste discharge requirements and implementation of the plan. Portions of the project include land disturbance and construction of permanent structures on undisturbed portions of an improved parcel, potentially introducing new sources of water pollution or significantly increasing on-site impervious surfaces. Conversely, capture of onsite stormwater and its infiltration into the ground could potentially result in a benefit by recharging groundwater. In accordance with Chapter 16.12 of the Monterey County Code, construction of the project requires submittal of a final a drainage and erosion control plan. For additional discussion on hydrology and water quality, please refer to Section VI.9 of this Initial Study. The CCRWQCB has designated the Director of Health as the administrator of the individual sewage disposal regulations, conditional upon County authorities enforcing the Regional Water Quality Control Plan, Central Coast Basin (Basin Plan). These regulations are codified in Chapter 15.20 of the Monterey County Code. The Environmental Health Bureau has reviewed the project and accompanying wastewater report (Carter, Source 13) and found the existing wastewater system and proposed improvements consistent with these regulations. A standard condition of approval will be incorporated into the project requiring verification from the RWQCB that the wastewater facility is in compliance with their requirements. For additional discussion on hydrology and water quality, please refer to Section VI.6 of this Initial Study. (Sources: 1, 8, and 13) CONSISTENT

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

A. FACTORS

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

Aesthetics	Agriculture and Forest Resources	Air Quality
⊠ Biological Resources	Cultural Resources	Energy
Geology/Soils	Greenhouse Gas Emissions	Hazards/Hazardous Materials
Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
□ Noise	⊠ Population/Housing	Public Services
⊠ Recreation	☐ Transportation/Traffic	☐ Tribal Cultural Resources
Utilities/Service Systems	⊠ Wildfires	Mandatory Findings of Significance

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

□ Check here if this finding is not applicable

- **FINDING:** For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation or maintenance of the proposed project and no further discussion in the Environmental Checklist is necessary.
- EVIDENCE: Section VI.2 Agricultural and Forest Resources: Data contained within the Monterey County Geographic Information System (GIS) identifies the subject property as grazing land but does not contain farmland designated as Prime, Unique, of Statewide or Local Importance, or under Williamson Act contract. There are not existing agricultural uses on the property. would not result in conversion of prime agricultural lands to non-agricultural uses. The subject

property is not considered a forest or timber resource inventoried as "Demonstration State Forest." Therefore, proposed project would have no impact to agricultural and forest resources. (Source: 1, 3, 4, 5, 6, and 9) *No Impact*.

<u>Section VI.6 – Energy:</u> In terms of energy use, construction of the project would not require techniques outside of the typical and standard practice in the area. Solar arrays exist on 2 separate areas on the subject property, providing renewable energy to existing PRI facilities. The operational component of the project includes tying into this existing service to provide electricity to the new units. Therefore, the project does not include components that would be wasteful, inefficient or unnecessary and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (Source: 1, 3, 4 and 23) *No Impact*.

Section VI.9 – Hazards and Hazardous Materials: The would not introduce new uses already approved and established on the subject property. There are no changes that would involve the use, release or transport of hazardous materials associated with the project, on the subject property or in the surrounding area, including a school. The project includes modification to structures that were built in the late 80's and thus, it is assumed that the building materials of these structure would not contain asbestos or lead. According to the California Department of Toxic Substances Control's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List), there are 3 active sites/facilities within Monterey County, none of which are on the subject property or within the vicinity. Therefore, the Project would not have the potential to create a significant hazard to the public or the environment relative to Government Code Section 65962.5. The subject property is not within an airport land use plan or in a 2-mile radius of a public or private use airport. The Project includes an amendment to an approved General Development Plan and would not interfere with the implementation of the Multi-Jurisdictional Hazard Mitigation Plan adopted for the County of Monterey. The subject property is within a State Responsibility Area. As discussed in Section II.B – Environmental Setting of this Initial Study, a fire brigade building was constructed on the property to bring fire protection services to the surrounding area. (Source: 1, 3, 4 and 16) No Impact.

<u>Section VI.11 – Mineral Resources:</u> The Monterey County Geographic Information System (GIS) and a site visit conducted by staff verifies that there are no mineral resources on the site. Further, the project does not include an ongoing use, or mining of, mineral resources on or near the site. Therefore, implementation of the proposed project would have no impact on minimal resources. (Source: 1, 3, 6, and 9) *No Impact*.

<u>Section VI.13 – Noise:</u> 1982 Monterey County General Plan Goal 22 is to maintain an overall healthy and quiet environment by trying to achieve living and working conditions free from annoying and harmful sounds. This goal is implemented through Chapter 10.60, Noise Control, of the Monterey County Code (MCC). MCC section 10.60.030 states that at any time of the day, operations which produce a noise level that exceeds eighty-five (85) dBA measured fifty (50) feet therefrom are prohibited. Preservation of ambient noise levels is achieved by MCC section 10.60.040 which restricts nighttime noise between the hours of 9:00 p.m. and 7:00 a.m. Construction related noise resulting from project improvements would be temporary. It is anticipated that typical construction equipment would be utilized for the project which would not exceed the noise levels established by the MCC nor would it generate excessive groundborne vibration. Construction during the nighttime restriction hours are not proposed. As discussed in Section II.A – Project Description, of this Initial Study, the purpose of the project is to improve upon PRI's operation, resulting in no change of use on the subject property. Therefore, there are no foreseen noise impacts caused by the operational elements of project implementation. Staff verified with Caltrans Division of Aeronautics mapping that the subject property in not located in vicinity of a private airstrip or airport land use plan nor is it within 2-miles of a public/public use airport. The project would have no impacts relative to noise hazards. (Source: 1, 2, 3 and 6) *No Impact*.

<u>Section VI.14 – Population and Housing:</u> As discussed in Section II.A – Project Description of this Initial Study, the project includes construction of 12 employee housing units that were approved but not constructed. The Employee Housing Plan (EHP) identifies that the project would provide onsite employee housing for up to 14 additional employees resulting in 75 employees that would reside onsite. However, this increase was already accounted for in the entitlement approved in 2002. Further, the project does not include construction of replacement housing offsite. (Source: 1 and 16) *No Impact.*

<u>Section VI.15 – Public Services:</u> Implementation of the proposed project would have no substantial adverse physical impacts associated with new or physically altered governmental facilities, where construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. (Source: 1, 2, 3, and 4) *No Impact*.

B. DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal

standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

March 24, 2021

Anna V. Quenga, Senior Planner

Date

V. EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).
- 2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

- a) Earlier Analysis Used. Identify and state where they are available for review.
- b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
- c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS

1.	AESTHETICS				
Wo	uld the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista? (Source: 1, 3, 4, 6, 9, & 15)			\boxtimes	
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Source: 1, 3, 4, 6, 9, & 15)				\boxtimes
c)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality. (Source: 1, 3, 4, 6, 9, & 15)				
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Source: 1, 3, 4, 6, 9, & 15)			\boxtimes	

Discussion/Conclusion/Mitigation:

As discussed in Section II.B – Surrounding Land Uses and Environmental Setting of this Initial Study, the subject property is located within the Big Sur Coast Land Use Plan (BSC LUP) area. The site is situated between State Route 1 and the Pacific Ocean, upon a northwest trending ridge which parallels the coast at approximately 1,100 to 1,200 feet above sea level.

The natural scenic beauty of Big Sur is considered an important resource and measures have been taken to preserve the visual qualities of the Big Sur area. In 1960, State Route 1 was designated as the first scenic highway in California. BSC LUP policies are intended to safeguard this critically important resource through preserving the coast's scenic beauty and natural appearance.

BSC LUP Key Policy 3.2.1 states that it is the County's objective to preserve Big Sur's scenic resources in perpetuity and to promote the restoration of the natural beauty of visually degraded areas wherever possible. As such, all future public or private development visible from Highway 1 and major public viewing areas (the critical viewshed) is prohibited. This applies to all structures, public and private roads, utilities, lighting, grading and removal or extraction of natural materials.

BSC LUP section 3.2.2.1 defines Critical Viewshed as: "everything within sight of Highway 1 and major public viewing areas including turnouts, beaches and the following specific locations Soberanes Point, Garrapata Beach, Abalone Cove Vista Point, Bixby Creek Turnout, Hurricane Point Overlook, upper Sycamore Canyon Road (Highway 1 to Pais Road), Pfeiffer Beach/Cooper Beach, and specific views from Old Coast Road as defined by policy 3.8.4.4."



Figure 32. Project Site – View from the South

1(b) and (c). Conclusion: No Impact.

Field investigation conducted by staff (Source 9) determined that the proposed development would not be seen from State Route 1 or major public viewing areas. Further confirmation was obtained through a search of Google Earth imagery (Source 15). Based on available data, the elevation of the traveled roadway of State Route 1, adjacent to the subject property, ranges between 700 and 950 feet above sea level. See **Figure 32**. Existing development located in the critical viewshed (visible from and directly adjacent to SR 1) is the entry to the property (see **Figure 32** below. There are no project components located within this area.

As discussed in section II.B. Surrounding Land Use and Environmental Setting, of this Initial Study, a viewshed easement prohibiting development has been conveyed on portions of the property necessary to provide permanent protection of critical viewshed (**Figure 31**).



Figure 33. Entry Access into Subject Property

Out of all the project elements, the 2 Guest Units and 3 Manager Housing Units proposed on the southeastern portion of the property would have the potential to be seen from State Route 1. Civil engineering information contained within the project plans (Source 1) indicate that the Guest Units would be sit upon an elevation of 1,120 feet above sea level and the Manager Housing Units would be at 1,040 feet above sea level. As illustrated in **Figure 34** below, there is a significant elevation difference between the roadway and the proposed structures. Due to topography, the linear distance between the roadway and the proposed structures (approximately 400 feet for Management Units and 600 feet for the Guest Units), and the significant amount of vegetation in the area, the units would not create a significant visual impact when viewed from State Route 1 with normal aided vision.



Figure 34. Approximate Location of Guest and Management Housing Units

The nearest major public viewing areas to the development is Pfeiffer Beach, the intersection of Sycamore Canyon Road and State Route 1, and Old Coast Road (see **Figure 35**). Pfeiffer Beach is approximately 3 miles northwest of the site and existing topography obstructs any views of the development. The intersection of Sycamore Canyon Road and State Route 1 is less than 1 mile north of the site. However, the elevation at the intersection is approximately 500 feet above sea level and the topography and existing vegetation obstructs any view of the development. Old Coast Road is approximately 6 miles north of the site, a distance that severely limits any visibility of the development. Therefore, the proposed development is not located within the Critical Viewshed and would have no impact on scenic resources, including a state scenic highway, or the quality of public view of the site and its surroundings.



Figure 35. Major Public Viewing Areas

1(a) and (d). Conclusion: Less than Significant Impact.

BSC LUP section 3.2.4 provides policies for development on lands not within the Critical Viewshed to ensure overall scenic qualities of the area are not diminished. New development should be subordinate to, and blend with, the surrounding environment. Structures and roads shall be located where existing topography or trees provide natural screening and designed to minimize alterations of the natural landform and avoid, as much as feasible, removal of healthy tree cover. Implementation of these policies are intended to protect scenic resources and the natural beauty of Big Sur.

As demonstrated in the figures contained in the Section II.A – Description of Project, of this Initial Study, the proposed structures would match the architectural style of existing development (**Figure 11**). Colors and materials of the units consist of natural wood and their design incorporates methods resulting in low-lying structures tucked into the ground (**Figure 36**). proposed project meets the BSC LUP requirement to be subordinate to environment as the proposed structures have been sited adjacent to existing development and/or requiring a minimal amount of land disturbance. Further, in accordance with BSC LUP scenic resource policies, a standard condition of approval will be incorporated into the project requiring submittal of a final exterior lighting plan demonstrating lighting will be downlit, unobtrusive and only illuminate the area intended. The plan shall delineate all exterior lighting for the project, including landscape lighting, and provide manufacture cut sheets for all exterior lighting fixtures. Therefore, the project as proposed and conditioned, would have a less than significant impact on a scenic vista and result in a less than significant impact resulting from new light sources.



Figure 36. Location of Proposed Guest Units

2. AGRICULTURAL AND FOREST RESOURCES

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

Woi	ald the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (Source: 1, 6 & 9)				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract? (Source: 1, 3, 4, 5, 6 & 9)				\boxtimes
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (Source: 1, 3, 4, 5, 6 & 9)				
d)	Result in the loss of forest land or conversion of forest land to non-forest use? (Source: 1, 3, 4, 5, 6 & 9)				\boxtimes
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (Source: 1, 3, 4, 5, 6 & 9)				\boxtimes

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

3. AIR QUALITY

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

Wo	ould the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
a)	Conflict with or obstruct implementation of the applicable air quality plan? (Source: 1, 2, 3 & 7)				\boxtimes	
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? (Source: 1, 2, 3 & 7)					
c)	Result in significant construction-related air quality impacts? (Source: 1, 2, 3 & 7)			\boxtimes		
d)	Expose sensitive receptors to substantial pollutant concentrations? (Source: 1, 2, 3 & 7)				\boxtimes	
e)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Source: 1, 2, 3 & 7)				\boxtimes	

Discussion/Conclusion/Mitigation:

The subject property is an existing resort with visitor serving units, resort amenities, employee housing and a firehouse, a.k.a. "fire brigade building", for the Big Sur Volunteer Fire Department. The project would allow modification and redesign of approved resort improvements that have not yet been built. The preliminary civil plans (Source 1) indicate approximately 2,150 cubic yards of cut and 900 cubic yards of fill will be necessary for these improvements. Out of the Current Phase improvements, grading will occur for the following project components: accessible restroom, employee housing units, improvements to the central services area, and roadway improvements to access and construct the management housing and new guest units (**Figures 2** and **37** below).

Policy No. 20.1.1 of the 1982 Monterey County General Plan requires the County's land use and development policies to be integrated in, and consistent with the natural limitations of the County's air basins. The California Air Resources Board (CARB) coordinates and oversees both state and federal air quality control programs in California. The CARB has established 14 air basins statewide and the subject property is located in the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). CARB uses ambient data from each air monitoring site in the NCCAB to calculate Expected Peak Day Concentration over a consecutive three-year period. MBARD is responsible for enforcing these standards and regulating stationary sources through the 2008 Air Quality Management Plan for the Monterey Bay Region (AQMP) (Source 8) and 2009-2011 Triennial Plan Revision ("Revision").

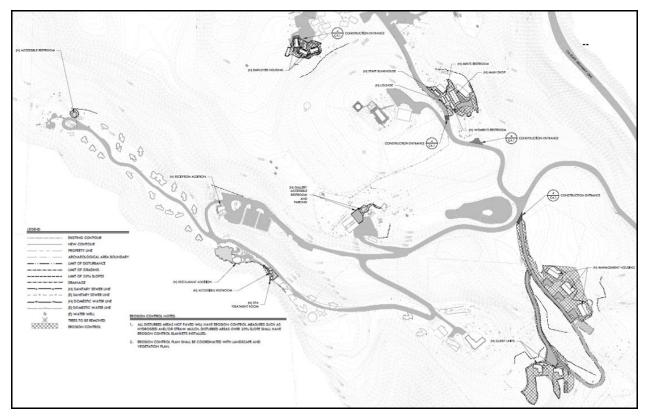


Figure 37. Preliminary Erosion Control Plan

3(a), (d), and (e). Conclusion: No Impact

As previously discussed in Section III of this Initial Study, the project is found consistent with the AQMP, resulting in no impact caused by conflict or obstruction of the plan. At present, Monterey County is in attainment for all federal and state air quality standards for Carbon monoxide (CO), Nitrogen dioxide (NO₂), Sulfur Dioxide (SO₂), lead, and fine particulates (PM_{2.5}). Implementation of the project would result in temporary emissions of CO, NO₂, SO₂, lead, and PM_{2.5} during construction and grading activities; however, these would be well within the emittance levels already accommodated within the AQMP, resulting in no impact. Therefore, operational component of the project would be consistent with existing development and would not result in emittance of substantial pollutant concentrations or other emission that would adversely affect a substantial number of people. Therefore, the project would have no impact.

Question 3(b) and (c). Conclusion: Less than Significant Impact.

The project would have the potential to temporarily impact air quality due to construction activities. The project would not make any changes to operations that would cause an increase in air pollutants other than temporary impacts associated with construction (Project Plans, Source 1).

Monterey County is designated as "non-attainment-transitional" for respirable particulates (PM₁₀) for the State's 2-hour ozone standard. Therefore, projects resulting in a substantial increase of PM₁₀ emissions would cause a significant impact to air quality. In addition, ambient ozone levels depend largely on the amount of precursors, nitrogen oxide (NOx) and reactive organic gases (ROG), emitted into the atmosphere. Implementation of the project would result in temporary impacts resulting from construction and grading activities caused by dust generation

and NOx and ROG emittance. Typical construction equipment would be used and volatile organic compounds (VOC) and NOx emitted from that equipment have already been accommodated within the AQMP. Therefore, their emissions would have a less than significant impact to air quality. As discussed earlier in this section, the project will require 2,150 cubic yards of cut and 900 cubic yards of fill that will occur over 6 different areas of PRI. If all grading were occur in 1 day (worst case scenario), 3,050 cubic yards, or 9,150 square feet, of dirt would be moved application. This amount of grading is less than the 2.2 acres (95,832 square feet) of disturbance per day threshold of significance for PM₁₀ set by MBARD's CEQA air quality guidelines (Source 7). Furthermore, the preliminary plans include incorporation of erosion control measures for addressing sedimentation and dust. Although, the construction component of the project would result in a temporary impact to air quality, the impact would be below the threshold of significance. Therefore, the project would have a less than significant impact.

4. **BIOLOGICAL RESOURCES**

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
 a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Source: 1, 2, 3, 4, 6, 9, 11, 14, 15 & 16) 	1			
 b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Source: 1, 2, 3, 4, 6, 9, 11, 14, 15 & 16) 				
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Source: 1, 2, 3, 4, 6, 9, 11, 14, 15 & 16)				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Source: 1, 2, 3, 4, 6, 9, 11, 14, 15 & 16)				
 e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Source: 1, 2, 3, 4, 6, 9, 11, 14, 15 & 16) 				

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
 f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (Source: 1, 2, 3, 4, 6, 9, 11, 14, 15 & 16) 				

Discussion/Conclusion/Mitigation:

Environmentally sensitive habitat areas (ESHA) are known to occur within Big Sur and these areas are susceptible to disturbance or degradation by human activities. In order to protect these areas, BSC LUP Key policy 3.3.1 requires all practical efforts be made to maintain, restore, and if possible, enhance Big Sur's environmentally sensitive habitats. In order to accurately potential development impacts, BSC LUP Policy 3.3.2 requires field surveys by qualified individuals to determine precise locations of habitat and recommend mitigating measures to ensure its protection. In accordance with this policy and BSC CIP 20.145.040.A.1, a biological assessment (2016) and a letter in response to a staff incomplete letter (2018) was submitted by the applicant (Ballerini, Source 11).

In his 2016 Supplemental Biological Assessment, Ballerini identifies his report as an addendum to an "original Biological Report" prepared by Jeff Norman September 6, 2001 (PLN970492 application materials, Source 16). Changes in environmental conditions or regulations since completion of Norman's 2001 report were identified. Current habitat conditions within the proposed development areas and potential impacts were also identified. Ballerini's 2018 report provides additional information relative to the adopted Habitat Conservation Plan (HCP) (Source 14), spring surveys, development within 100 feet of ESHA and potential impacts within the proposed employee housing area.

As discussed in Section II.B – Environmental Setting of this Initial Study, US Fish and Wildlife Service issued an incidental take permit (permit No. TE119210-0) for impacts to Smith's blue butterfly (*Eupholites enoptes smithi*)(SBB) and California red-legged frog (*Rana aurora draytonii*)(CRLF) resulting in approved development (Source 16). In accordance with section 10(a)(1)(B) of the Endangered Species Act of 197, a Habitat Conservation Plan (HCP) was prepared and submitted with the take permit application. The take permit was issued and the HCP was approved December 2006 for the duration of 20 years. Pursuant to CEQA Guidelines section 15150, the HCP (Source 14) in its entirety is incorporated by reference. A copy of the HCP can be obtained from the US Fish & Wildlife Service ECOS Environmental Conservation Online System (<u>https://ecos.fws.gov/ecp0/conservationPlan/plan?plan_id=1512</u>). A copy of the HCD is also on file with Monterey County HCD – Planning.

Vegetation found on the PRI site can be characterized by Redwood Forest and riparian habitats. Oak woodlands, coast range grassland habitat can be found to the east (inland) and Coastal sage scrub, Northern Coastal scrub and Coastal bluff scrub are found to the west (coastal). The 101 acre site contains many distinct diverse plant communities. To clearly identify the biological conditions and potential impacts, Ballerini's 2016 report provides a detailed discussion for 8 distinct development areas which are summarized below.

Area 1. Central Services

Habitat in the central services area consists of Redwood Forest, Coast Live Oak Forest and ruderal vegetation (**Figures 8** and **38**). Exotic pride of Madeira (*Echium candicans*), a listed invasive species, was also found growing along the east side of the service access road. Although development would occur primarily in areas previously disturbed and occupied with existing development, site improvement would require removal of four California bay laurel (*Umbellularia californica*) trees (12-inch, 13-inch, 24-inch and 25-inches in diameter) and one 36-inch diameter stump. Ballerini points out that these trees are in proximity to a large coast live oak and recommends their removal as bay laurels contribute to the spread of sudden oak disease (*Phytophthora ramorum*), especially when located within 15 feet of an oak tree's trunk.



Figure 38. Central Services Area – Photos from Source 11

Area 2. Management Housing

Ballerini indicates that development in the management housing area (**Figures 3** and **39**) lies within California Annual Grassland and Coyote Brush Scrub habitat, as previously mapped in the Norman Biological Assessment. The dominant species in the annual grassland is exotic Harding grass (*Phalaris aquatica*), recognized as an invasive species, and elements of Coastal Terrace Prairie and Spreading Rush Seep habitats continue to reduce in numbers. However, rich native grass species still occur in the grassland. Coyote Brush Scrub habitat in this area has been mowed for fire suppression. Ballerini indicates that over the years, this activity allowed understory grassland constituents that were likely the habitat of the site to regenerate. A cluster of invasive pride-of-Madeira plants were found in the area but outside of the proposed development. In Ballerini's 2018 response letter, a spring survey was conducted in this area on May 3rd and 9th of 2018 to determine if sensitive spring-flowering grassland occurred in the area. Staking delineating the proposed development (e.g. grading limits, buildings, and stormwater facilities) was observed and Ballerini concluded that there were no new sensitive or listed species located in the development impact area.



Figure 39. Management Housing Area – Photos from Source 11

Area 3. Guest Units

The proposed guest units and access road are located south of the management housing (**Figures 11** and **40**) within as Coastal Terrace Prairie habitat containing native bunch grasses and forbs comprising of Coastal Prairie grassland natural community. The development limits in this area were also surveyed in the spring as discussed in Ballerini's 2018 response letter. Wine-cup clarkia (*Clarkia purpurea ssp. purpurea*) plants were observed in proximity to the proposed development and access road during Norman's 2001 survey and again during Ballarini's 2018 spring survey. The Department of Fish and Wildlife considers the Coastal Prairie grassland natural community as a special status habitat. Wine-cup clarkia is considered uncommon and qualifies for California Native Plant Society rare plant listing.



Figure 40. Guest Unit Area with Wine-cup Clarkia Insert – Photos from Source 11

Area 4. Gallery Parking and Restroom

Habitat in the area consists of Annual Grassland at the fringes of the gallery parking area and Redwood Forest at the proposed restroom addition. Existing improvements in this area consists of the Post Gallery, Art and Furniture Gallery and accessory structures. The proposed development is located adjacent to these improvements within disturbed areas (**Figures 12** and **41**). However, proposed improvements includes installation of a drainage swale located near coast redwood trees and due to the site's topography, stormwater from the development area would flow into a drainage corridor directed into a nearby pond containing the Federally-listed California red-legged frog (*Rana aurora draytonii*) (Figure 42).



Figure 41. Gallery Parking (left) and Restroom Area (right) – Photos from Source 11



Figure 42. Onsite Pond

5. Hot Tub Restroom

The proposed hot tub restroom (**Figures 13** and **43**) is located at the northwest portion of PRI adjacent to an existing guest unit and public trailhead. Vegetation in this area comprises of Annual Grassland habitat containing non-native grasses and forbs with native ornamental landscaping near the guest unit.



Figure 43. Hot Tub Area

6. Reception Addition

The existing reception area (**Figures 14** and **44**) is located on the western portion of PRI, just north of the Sierra Mar restaurant. Ballarini identifies the surrounding vegetation as Redwood Forest habitat with small portion of Coast Live Oak elements. Poison oak scrub containing Coyote brush (*Baccharis pilularis*) and hedge nettle (*Stachys bullata*) and Exotic periwinkle (*Vinca major*) are found mixed within with areas vegetation. Periwinkle is a listed invasive species by the Cal-An asphalt roadway and parking area leads to the structure which is surrounded by ornamental landscaping at the entrance. The reception addition is proposed on the northern portion of the building over existing hardscape gravel pathways. Ballarini concludes that there would be no direct impacts to the habitat in order to accommodate the addition. Based on the existing conditions, stormwater runoff drainage into the nearby pond containing the Federally-listed California red-legged frog (*Rana aurora draytonii*) (**Figure 42**).



Figure 44. Reception Addition Area – Photo from Source 11

7. Spa Treatment Room, Restroom and Restaurant Addition

The spa treatment room, restroom and restaurant addition (**Figure 18**) are part of the Future Phase facility improvements of the General Development Plan. The proposed location of these improvements area are on the western slope of PRI where environmentally sensitive habitat areas (ESHA) have been documented (Norman's 2001 and Ballarini's 2016 and 2018 reports). The vegetation type consists of California Sagebrush Scrub containing seacliff buckwheat (*Eriogonum parvifolium*). Seacliff buckwheat is a host food plant of the Federally-listed Endangered Smith's blue butterfly (*Euphilotes enoptes smithi*). As discussed in section II.A – Project Description, this development would be subject to a separate entitlement subject to a separate environmental review.

Area 8. Employee Housing

The project includes construction of 12 employee housing units that were approved in 2002 but not yet built (see Section II.A – Project Description of this Initial Study and **Figures 3** and **45**). Ballarini notes that this development area contains both Redwood and Coast Live Oak forest. The understory vegetation is mixed with native and invasive exotic vegetation. Four (4) bay laurel trees are proposed for removal ranging in DBH from 12" to 36" to accommodate the southern structure. Drainage swales are proposed to accommodate site drainage and are located in areas containing mixed understory.



Figure 45. Employee Housing Area – Photos from Source 11

Ballerini's 2018 report identifies an additional impact area not included in the 8 development areas described above. The project includes improvement to an existing path (see Figures 15, 42 and 46) adjacent to a pond that provides habitat for California red-legged frog. This path is part of the dedicated public trail system that was implemented through Mitigation Measure 11 of the IS/MND adopted in 2002 (Source 16). Improvement to this path is intended to provide ADA access and consists of the placement of fill and soils stabilizers. No excavation or surfacing with impervious surfaces such as concrete or asphalt is proposed.



Figure 46. Pedestrian Path Adjacent to the Pond

4(a), (b), (c), (d), (e) and (f). Conclusion: Less than Significant Impact with Mitigation Incorporated.

Based on the data available, the project would have the potential to adversely effect candidate, sensitive, or special status species in local or plans, policies, or regulations; or those protected by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

As discussed above, the biological surveys conducted for past and proposed PRI developments have been collected for over the course of 20 years and identify that not only ESHA occurs onsite, but through mitigation and best management practices, the protection and restoration of special status species have been successful. Based on the recommendations of the project biologist (Source 11, Bellerini), additional mitigation measures have been identified to reduce potential project related ESHA impacts to a less than significant level. As such, ESHA would be protected, restored and conserved to the extent feasible in accordance with federal, state and local laws.

Mitigation Measure No. 1. Compliance with the Adopted Habitat Conservation Plan. In accordance with the Post Ranch Inn Incidental Take Permit and the Habitat Conservation Plan (HCP) in effect, construction activities near California red-legged frog (*Rana aurora draytonii*)(CRLF) shall employ the construction protocols described in sections 5.1.1.1 and 7.7.1 of the HCP. If the project components necessitate major or minor amendments to the Incidental Take Permit or HCP, the owner/applicant shall be responsible for obtaining the proper permissions from the US Fish and Wildlife Service and as specified with the process set forth in section 10 of the HCP.

Mitigation Measure Monitoring Action No. 1a: Prior to issuance of construction permits for grading and building, the owner/applicant shall provide HCD-Planning with evidence documenting the project components are covered under the existing Take Permit and HCP, or that proper amendments specified in the HCP have been obtained.

Mitigation Monitoring Action No. 1b. Prior to issuance of construction permits for grading and building, the owner/applicant shall provide HCD-Planning evidence that construction activities will comply with the HCP, including but not limited to, scheduling construction during appropriate times of the year and obtaining a qualified biologist to supervise all work required to protect the sensitive pond habitat.

Mitigation Monitoring Action No. 1c. Prior to final of construction permits for grading and building, the owner/applicant shall submit evidence documenting compliance with construction requirements of the HCP.

Mitigation Measure No. 2. Construction Protection Measures – Fencing. In order to prevent construction activities from damaging protected trees and encroaching into environmentally sensitive habitat areas and natural plant communities, a Construction Management and Protective Fencing Plan shall be prepared and incorporated in project implementation. The plan shall be approved by HCD-Planning, include the following protection measures below, and shall be incorporated within the approved construction permits and plans:

- Protective habitat fencing shall be installed to delineate the construction envelope to eliminate disturbance (e.g. trampling and foot and vehicular traffic) of areas outside the construction envelope.
- Construction staging and parking shall be prohibited in environmentally sensitive habitat areas and natural plant communities.
- Trees located within and adjacent to development areas shall be protected with habitat protection fencing and hay-bale trunk wrapping prior to grading and construction activities.
- The existing dirt access road leading to the Management Housing and Guest Unit areas shall be utilized for ingress and egress construction traffic. Vehicle access shall be prohibited outside of the roadway bed and within natural plant areas.
- To avoid potential impacts to redwood trees growing in proximity to the retaining wall in the Reception Addition area, excavation for trenching, footings or piers shall be hand excavated using manual tools. Any tree root uncovered over 2 inches shall be protected and sleeved with all other smaller roots flushed cut using a sterilized clean saw blade.

Mitigation Measure Monitoring Action No. 2a: Prior to issuance of construction permits for grading and building, the owner/applicant shall develop a Construction Management and Protective Fencing Plan in consultation with a qualified biologist and submit the finalized protective fencing plan to HCD-Planning for review and approval. The approved Construction Management Plan shall include the protection measures outlined in **Mitigation Measure 2**, clearly delineate all resources and areas to be protected, all locations where protective fencing shall be installed, and identify the protective fencing materials to be used. The approved plan shall be incorporated into the approved set of job-site and office-copy construction plans for grading and building.

Mitigation Monitoring Action No. 2b. Prior to final of construction permits for grading and building, the owner/applicant shall submit evidence documenting successful implementation of the approved Construction Management and Protective Fencing Plan. This evidence shall include a statement by a qualified biologist acknowledging successful implementation and be submitted to HCD-Planning for review and approval.

Mitigation Measure No. 3. Protection Measures – Grading and Soil Disturbance. In order to prevent grading, soil disturbance, erosion and sedimentation from impacting protected trees, environmentally sensitive habitat areas and natural plant communities, a Grading and Erosion Control Plan shall be prepared and incorporated in project implementation. The plan shall be

approved by HCD-Planning, include the following protection measures below, and shall be incorporated within the approved construction permits and plans:

- Site erosion shall not be permitted to enter areas supporting natural communities beyond the perimeter of development. Erosion control measures such as silt or debris fencing shall be installed along the border of construction areas to prevent sedimentation and construction debris from entering habitat communities. Disturbed soils shall be kept free of exotic species and stabilized with biodegradable erosion blankets, sterile straw, organic mulch and/or native grass restoration seeding.
- Stockpile soil and grading areas shall be managed. No exotic invasive species shall be allowed to become established or produce seed on disturbed soils generated from grading operations.
- No overburden soil material shall be deposited beyond the construction edge or road edge. Casting of this material shall be prohibited in Coastal Terrace Prairie Habitat, Freshwater Marsh Habitat and other sensitive wetland areas.
- The use of permeable paving material is recommended to reduce storm-water runoff and resultant erosion into adjacent natural plant communities.
- Development location is near (within 300-feet) and upslope from the pond containing the Federally-listed California red-legged frog (Rana aurora draytonii) and approximately 170-feet from Freshwater Marsh Habitat also located to the east, shall be consistent with the HCP.
- If necessary, sediment or debris control devices shall be implemented if construction is scheduled during the rainy season.
- Excavated topsoil from the Guest Unit area shall be stockpiled in the area and used to top-dress finish grades around the Guest Units.
- Employee Housing area. During site grading, at least 50% of the existing soil surface around coast live oaks and coast redwoods must be preserved to achieve consistency with LUP Policy 3.3.3.A.8. Grading must avoid detrimental impacts to major roots of the existing trees.
- Storm water runoff shall be routed to the designed drainage swales vegetated with the specified native grass and rush species.

Mitigation Measure Monitoring Action No. 3a: Prior to issuance of construction permits for grading and building, the owner/applicant shall develop a Grading and Erosion Control Plan in consultation with a qualified biologist. The plan shall include the protection measures outlined in **Mitigation Measure 3**, and meet all applicable requirements set forth in the Monterey County Code. The Grading and Erosion Control Plan shall be reviewed and approved by Monterey County, including but not limited to HCD-Planning and HCD-Environmental Services and be incorporated in the job-site and office-copy construction plans for grading and building.

Mitigation Monitoring Action No. 3b. Prior to issuance of construction permits for grading and building, the owner/applicant shall submit evidence documenting construction related grading, soil disturbance, erosion and sedimentation within covered areas of the HCP is consistent with the plan and if necessary, all action required prior to construction identified in **Mitigation Measure 1** have been complied with.

Mitigation Monitoring Action No. 3c. Prior to final of construction permits for grading and building, the owner/applicant shall submit evidence documenting successful

implementation of the approved Grading and Erosion Control Plan. In addition to implementation requirements set forth in the Monterey County Code, this mitigation requires the owner/applicant submit a statement by a qualified biologist acknowledging successful implementation to HCD-Planning for review and approval.

Mitigation Measure No. 4. Protection Measures Within The Proposed Drainage Swales. In order to prevent biological impacts caused by site drainage, a Drainage Plan shall be prepared and incorporated in project implementation. The plan shall be approved by HCD-Planning and HCD-Environmental Services, meet all applicable Monterey County Code requirements and incorporate the following biological protection measures:

- Drainage swales under the redwood canopies in the Central Services area shall be installed as collection areas for drain water percolation and no grading or stockpiling of drainrock or soil shall occur in these zones where redwood roots are present.
- Drainage swales and all exposed soils surrounding the Management Housing building and parking areas shall be restored with perennial grassland species, site-appropriate for the location (see landscape plan for native plant species specifications).
- The salvaged plants shall be used for restoration 'landscape' plantings in the drainage basins.

Mitigation Measure Monitoring Action No. 4a: Prior to issuance of construction permits for grading and building, the owner/applicant shall develop a Drainage Plan in consultation with a qualified biologist. The plan shall include the protection measures outlined in **Mitigation Measure 4**, and meet all applicable requirements set forth in the Monterey County Code. The Drainage Plan shall be reviewed and approved by Monterey County, including but not limited to HCD-Planning and HCD-Environmental Services and be incorporated in the job-site and office-copy construction plans for grading and building.

Mitigation Monitoring Action No. 4b. Prior to final of construction permits for grading and building, the owner/applicant shall submit evidence documenting successful implementation of the approved Drainage Plan. In addition to implementation requirements set forth in the Monterey County Code, this mitigation requires the owner/applicant submit a statement by a qualified biologist acknowledging successful implementation to HCD-Planning for review and approval.

Mitigation Measure No. 5. Implementation Of Exotic Species Control. In order to support the long-term maintenance of native plant areas, an Exotic Species Control Plan shall be prepared and incorporated with project implementation. The plan shall be approved by HCD-Planning and include the provisions for the specific development areas below:

- All development areas. All disturbed soil resulting from site grading shall be kept free of exotic species. To prevent erosion in areas treated for eradication, areas not stabilized with existing native plants must be revegetated with site appropriate native species endemic to the communities in which the exotics were removed. All removed exotic plant species shall be responsibly disposed in a green waste facility. Invasive French broom present in various areas of the property shall be eradicated at first sign in order to prevent detrimental impacts to native habitats.
- Central Services area. Eradication of pride-of-Madeira plants along the east side of the access road in the Central Services area shall occur prior to the development of the drainage swale. Bay laurel trees within 15 feet of the trunks of oaks in the Central Services area shall be removed.

- Management Housing area. Pride-of-Madeira plants southeast of housing area and along the fringe of the mowed grassland knoll shall be removed. Harding grass and non-native annual grasses shall also be eradicated. Mowing of the annual grassland in this area shall continue to maintain eradication of the invasive perennial Harding grass.
- Reception Addition. Invasive periwinkle along the north slope of this area shall be eradicated by hand removing its aggressive spreading root systems and plant tissues. Accidental wash down of the plant material down slope shall be prevented.
- Employee Housing area. The exotic, invasive forget-me-not species and all other identified exotic plants shall be eradicated prior to land disturbance or grading in this area.

Mitigation Measure Monitoring Action No. 5a: Prior to issuance of construction permits for grading and building, the owner/applicant shall develop an Exotic Species Control Plan in consultation with a qualified biologist. The plan shall include the protection measures outlined in Mitigation Measure 5, and be incorporated within the approved Restoration Plan (Mitigation Measure 7) and Landscape Plan (Mitigation Measure 8). The Exotic Species Control Plan shall be reviewed and approved by HCD-Planning and be incorporated in the job-site and office-copy construction plans for grading and building.

Mitigation Monitoring Action No. 5b. Prior to final of construction permits for grading and building, the owner/applicant shall submit evidence documenting successful implementation of the approved Exotic Species Control Plan. In addition to implementation requirements set forth in the Monterey County Code, this mitigation requires the owner/applicant submit a statement by a qualified biologist acknowledging successful implementation to HCD-Planning for review and approval.

Mitigation Measure No. 6. Plant Salvaging. In order to support the long-term maintenance of natural plant areas, native grasses, rushes and plants, a Plant Salvaging Plan shall be prepared and incorporated with project implementation. The plan shall be approved by HCD-Planning and include the provisions for the specific development areas below:

- Management Housing area: Prior to land disturbance in the Management Housing aarea, remnant native perennial bunch grasses and rushes in the Annual Grasslands Danthonia californica (California oatgrass), common rush (*Juncus effusus var. brunneus* and *var. pacificus*), and spreading rush (*Juncus patens*) shall be salvaged and set aside. The salvaged plants shall be used for restoration 'landscape' plantings in the drainage basins.
- Guest Unit area: Prior to land disturbance in the Guest Unit area, Wine-cup clarkia (Clarkia purpurea ssp. purpurea) shall be salvaged, set aside and utilized in the approved restoration and landscape plans.

Mitigation Measure Monitoring Action No. 6a: Prior to issuance of construction permits for grading and building, the owner/applicant shall develop a Plant Salvaging Plan in consultation with a qualified biologist. The plan shall include the protection measures outlined in **Mitigation Measure 6**, and be incorporated within the approved Restoration Plan (**Mitigation Measure 7**) and Landscape Plan (**Mitigation Measure 8**). The Plant Salvaging Plan shall be reviewed and approved by HCD-Planning.

Mitigation Measure Monitoring Action No. 6b: Prior to issuance of construction permits for grading and/or building, the owner/applicant shall include a note on the construction plans encompassing the language contained within Mitigation Measure No. 6.

Mitigation Monitoring Action No. 6c. Prior to final of construction permits for grading and building, the owner/applicant shall submit evidence documenting successful implementation of the approved Plant Salvaging Plan. This evidence shall include a statement by a qualified biologist acknowledging successful implementation and be submitted to HCD-Planning for review and approval.

Mitigation Measure No. 7. Coastal Terrace Prairie Restoration Plan. Coastal Terrace Prairie impacts shall be offset 1:1 by conversion of exotic annual grassland habitat and restoration management of existing grassland that has been overcome by opportunistic coyote bush.

- Exotic annual grassland in areas north of the Management Housing and perennial bunchgrass grassland inundated with coyote brush located directly east of the proposed Guest Units on the east side of the access road leading to the units are prime areas to restore using site materials harvested from the development areas prior to grading and incorporating management techniques such as mowing and timely Fall installation of plant materials. Larger, cohesive native perennial grasslands containing the constituents of the Coastal Terrace Prairie will ecologically function in a more positive manner than piecemeal patches of restored grassland spread across the property. Expanding the existing grassland east of the Guest Units through restoration, enhancement, and focused management would be better suited for the resource. Final offset impacts will be quantified by the project Biologist and submitted with the Spring Survey.
- A Coastal Terrace Prairie Restoration Plan should also be developed to describe salvage and growing operations, plant specifications, restoration techniques, and management strategies including long term monitoring protocols required for the restoration and management of the sensitive grassland.

Mitigation Measure Monitoring Action No. 7a: Prior to issuance of construction permits for grading and building, the owner/applicant shall develop a Restoration Plan in consultation with a qualified biologist. The plan shall include the protection measures outlined in **Mitigation Measure 7**, and shall be prepared in conjunction with the approved Plant Landscape Plan (**Mitigation Measure 8**). The Restoration Plan shall be reviewed and approved by HCD-Planning.

Mitigation Measure Monitoring Action No. 7b: Prior to issuance of construction permits for grading and/or building, the owner/applicant shall include a note on the construction plans encompassing the language contained within **Mitigation Measure No. 7**.

Mitigation Monitoring Action No. 7c. Prior to final of construction permits for grading and building, the owner/applicant shall submit evidence documenting successful implementation of the approved Restoration Plan. This evidence shall include a statement by a qualified biologist acknowledging successful implementation and be submitted to HCD-Planning for review and approval.

Mitigation Measure No. 8. Landscape Plan. In order to support the long-term maintenance of native plant areas, a Landscape Plan shall be prepared and incorporated with project implementation. The plan shall be approved by HCD-Planning and include the provisions for the specific development areas below:

- The plan shall be meet the requirements of the State Model Landscape Ordinance.
- Replacement of California bay laurel trees in the Central Services and Employee Housing areas shall be replaced at a 1:1 ratio with coast live oak or coast redwood trees. Mitigation monitoring is required for a 5-year minimum to ensure the health and vigor of the replacement trees.
- Salvaged plants (Mitigation Measure No. 6) shall be used for restoration landscape plantings in the drainage basins.
- To avoid dry-season irrigation (and possible oak root fungus infection of nearby coast live oak trees), landscaping shall utilize site-specific native plant species and treated as restoration of understory habitat.
- Landscaping in all disturbed soils and drainage swales surrounding the Guest Unit area shall be restricted to Coastal Terrace Prairie habitat species (primarily California oatgrass, Danthonia californica). Plantings not specified as grassland plant assemblage shall be prohibited.
- Native site-specific plant species should be utilized for landscaping and exotic species control should be on-going. Minor redwood tree limb pruning may be required for limbs < 4".
- Landscaping beneath the canopies of coast live oaks should utilize site-specific native plants endemic to the plant community to avoid the need for dry-season irrigation, which could adversely impact oak roots and aid in spreading oak root fungus.

Mitigation Measure Monitoring Action No. 8a: Prior to issuance of construction permits for grading and building, the owner/applicant shall develop a Landscape Plan in consultation with a qualified biologist. The plan shall include the protection measures outlined in Mitigation Measure 8, and shall be prepared in conjunction with the approved Plant Salvaging Plan (Mitigation Measure 6) and Restoration Plan (Mitigation Measure 7). The Landscape Plan shall be reviewed and approved by HCD-Planning.

Mitigation Measure Monitoring Action No. 8b: Prior to issuance of construction permits for grading and/or building, the owner/applicant shall include a note on the construction plans encompassing the language contained within Mitigation Measure No. 6.

Mitigation Monitoring Action No. 8c. Prior to final of construction permits for grading and building, the owner/applicant shall submit evidence documenting successful implementation of the approved Plant Salvaging Plan. This evidence shall include a statement by a qualified biologist acknowledging successful implementation and be submitted to HCD-Planning for review and approval.

5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
 a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (Source: 1, 3, 6, 10, & 16) 				\boxtimes
 b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Source: 1, 3, 5, 6, 10, & 16) 		\boxtimes		
c) Disturb any human remains, including those interred outside of formal cemeteries? (Source: 1, 3, 5, 6, 10, & 16)		\boxtimes		

Discussion/Conclusion/Mitigation:

The Big Sur Coast Local Coastal Program Archaeological Sensitivity Zones Central Section Map indicates that the subject property has a high archaeological sensitivity (Source 3). Monterey County Geographic Information System (GIS, Source 6) indicates that the project area has a high archaeological sensitivity and is within 750 feet of a known archaeological report. When the current operating General Development Plan was reviewed (Source 16), an accompanying archaeological identified significant resources onsite and mitigation measures were adopted to reduce potential impacts to a less than significant level. Also see section II.B. Surrounding Land Uses and Environmental Setting of this Initial Study.

The objective of Big Sur Coast Land Use Plan (BSC LUP) Key Policy 3.11.1 (Source 3) is to maintain and protect Big Sur's archaeological resources for their scientific and heritage values. As such, development would be considered compatible with this objective when site planning and design features that avoid or mitigate impacts to archaeological resources have been incorporated. Further, BSC LUP General Policy 3.11.2.3 and accompanying regulation in Monterey County Coastal Implementation Plan, Part 3 (CIP) section 20.145.120.C.1 states that development proposed on parcels with known archaeological resources shall not be categorically exempt from environmental review.

In accordance with CIP section 20.145.120.B, a Cultural Resources report and Supplemental report (Schlagheck, Source 10) was prepared to evaluate the site and development for potential impacts to archaeological resources. This evaluation included research of records maintained by the Northwest Information Center of the California Historical Resources Information System at Sonoma State University and conducting a pedestrian surface reconnaissance of the project area.

5(a). Conclusion: No Impact.

The Secretary of the Interior's Standards for the Treatment of Historic Properties has a general rule that structures 50 years of age or older have the potential to be a historical resource. On May 31, 1989, the Monterey County Planning Commission certified the Post Ranch Inn Final EIR and approved a Coastal Development Permit (File No. PC-6336, Resolution No. 89-176) allowing the establishment of Post Ranch Inn (PRI) and construction of structures occurred soon after. In this particular case, the structures are less than 50 years of age. Information found in Monterey

County Planning archives (Sources 3, 6, 10, and 16) do not indicate that the subject property and/or existing structures are historically significant. Zoning of the subject properties include a Historic Resource overlay solely for the protection of archaeological resources, not for the property's historicity. Based on the whole of the record, the project would have no impact to historical resources.

5(b) and (c). Conclusion: Less Than Significant Impact with Mitigation Incorporated.

The project area is currently recognized as the ethnographic territory of the Esselen, who were semi-sedentary peoples that hunted, and gathered and collected. Permanent occupation sites in Big Sur have been found along the banks of streams, whereas ephemeral sites have been found along ridges, the coastline, oak groves, bedrock outcrops, and quarries. Radiocarbon dating suggests permanent occupation of the region began about 5,000 to 6,000 years ago.

Analysis of previous PRI development permits and associated environmental review produced an extensive evaluation of archaeological resources on the site. This evaluation consisted of general surface reconnaissance, subsurface testing, and cultural resources construction monitoring; resulting in locating, identifying, and cataloging a number of resources in the project area. In compliance with previously adopted mitigation measures, a conservation easement was conveyed over areas containing identified archaeological resources and zoning of the property (APN 419-311-042-000) was amended to include a Historical Resource or "HR" overlay district.

Because of numerous archaeological resources found to exist on the property, the Cultural Resources report and Supplemental report (Schlagheck, Source 10) identified potential impacts to known, and unknown, archaeological resources as a result of the proposed development. Mitigation measures recommended within the report requiring establishment of a zone in areas with a very high archaeological sensitivity, review of final construction plans by a qualified archaeologist, installation of protective fencing, and monitoring have been incorporated. Successful implementation of these mitigation measures would reduce project impacts to archaeological resources to a less than significant level.

Mitigation Measure No. 9. Establishment of Archaeological Management Zone (AMZ) : In recognition of the numerous sites and features identified in the Cultural Resources Report for the Post Ranch Inn Development Plan (Monterey County Document No. LIB160406), a zone of archaeological sensitivity shall be established to protect known and unknown (i.e. buried) cultural resources during development. Prior to construction activities associated with the Post Ranch Inn Combined Development Permit and General Development Plan, an Archaeological Management Zone (AMZ) shall be established around known archaeological sites and features. The AMZ shall include a 100 foot buffer area. Project elements located within the designated AMZ shall follow development standards and best management practices for development within the AMZ.

Mitigation Measure Monitoring Action No. 9a: Prior to the issuance of construction permits for grading or building, the owner/applicant shall submit to HCD-Planning a copy of a contract between the owner/applicant and a qualified archaeologist, also referred to as the project archaeologist, for review and approval. Should HCD-Planning find the contract incomplete or unacceptable, the contract will be returned to the owner/applicant and a revised contract shall be re-submitted for review and approval. In addition to the contract requirements established in **Mitigation Measure No. 9**, the scope of work performed by the project archaeologist shall also include the following:

- Develop and implement AMZ Development Standards and Best Management Practices in accordance with **Mitigation Measure No. 10**.
- Include provisions requiring a qualified archaeologist to monitor project elements identified in **Mitigation Measure Monitoring Action No. 10b**. The contract shall specify which project elements require monitoring and the respective type and intensity of the monitoring (e.g. monitoring during all activities involving soil disturbance or monitoring during excavation of a certain depth), how sampling of the excavated soil shall occur, authorizing the monitor to stop work in the event resources are found, and specify locations/situations where the monitor would be authorized to discontinue monitoring.
- Include the final approved AMZ map identified in **Mitigation Measure Monitoring Action No. 9b**.
- Include preparation of a final report suitable for compliance documentation to be prepared within four weeks of completion of the data recovery field work. In addition, this report shall verify successful implementation of **Mitigation Measure Nos. 9 through 13.**

Mitigation Measure Monitoring Action No. 9b: Prior to issuance of construction permits for grading or building, the owner/applicant shall submit a site map delineating the Archaeological Management Zone (AMZ) within the Post Ranch Inn property to HCD Planning for review and approval. The AMZ map shall be prepared in consultation with a qualified archaeologist and a licensed land surveyor to ensure all known archaeological sites and features and a 100-foot buffer area from those sites and features are encompassed within the AMZ. The AMZ map shall identify all elements of the proposed development located within the AMZ, including the "specific PRIDP elements" listed within the Cultural Resources Report for the Post Ranch Inn Development Plan (Monterey County Document No. LIB160406). The AMZ map shall include a meets and bounds description of the AMZ boundaries to ensure accurate location of the area to be protected.

Mitigation Measure No. 10. Development Standards and Best Management Practices for Construction within the Archaeological Management Zone (AMZ):

To ensure project elements identified within the Archaeological Management Zone (AMZ) minimize impacts to archaeological resources, construction associated with the Post Ranch Inn Combined Development Permit and General Development Plan shall incorporate Development Standards and Best Management Practices reviewed and approved by HCD-Planning. Prior to issuance of construction permits, the owner/applicant, in consultation with a qualified archaeologist, shall prepare Development Standards and Best Management Practices for Construction within the AMZ that include, but not limited to the following:

- Plan Review. Final construction plans for site development and structure foundations located within the AMZ shall be designed to minimize impacts to cultural resources and shall be reviewed by the project archaeologist under contract in accordance with **Mitigation Measure Monitoring Action No. 10b**. This review shall include an assessment of impacts and recommendations for mitigations for those impacts which cannot be avoided.
- Archaeological Monitoring. Based on final construction plan review and the proximity of development to known archaeological resources, Development Standards shall include Archaeological Construction Monitoring Protocol. This protocol shall identify each

project element within the AMZ and specify the type and intensity of construction monitoring required for each respective element.

- Archaeological Easements. All existing archaeological easement boundaries near construction zones shall be protected by installing and maintaining exclusionary fencing prior to and during construction. Exclusionary fencing shall also be installed around the areas identified as Bedrock Mortar Nos. 1 and 2 within the Cultural Resources Report for the Post Ranch Inn Development Plan (Monterey County Document No. LIB160406).
- Data Recovery. Mitigation plans from this process shall also provide for data recovery and reporting on monitoring finds should they be encountered.
- Final Report. After construction has been completed, a final report shall be submitted to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 10a: Prior to issuance of construction permits for grading or building, the owner/applicant shall include a note on the construction plans stating that all development shall be consistent with the approved Development Standards and Best Management Practices for Construction within the AMZ. The owner/applicant shall submit said plans to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 10b: Prior to issuance of construction permits for grading or building, final construction plans shall be reviewed by a qualified archaeologist. This review shall ensure all project elements located within the AMZ have been thoroughly reviewed. As such, results of the plan review shall be summarized in a plan review letter that includes a list of all project elements reviewed, indicate the type and intensity of construction archaeological monitoring for each respective element, and delineate a data recovery plan if any archaeological resources are found. The plan review letter shall be signed and submitted by the reviewing archaeologist to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 10c: If archaeological resources are unexpectedly discovered during construction, work shall be halted on the parcel until the find can be evaluated and appropriate mitigation measures are formulated and implemented. Data recovery shall be implemented during the construction and excavation monitoring. If intact cultural features are exposed, they shall be screened for data recovery using the appropriate method for site and soil conditions. The owner/applicant shall allow the onsite Tribal Monitor (see **Mitigation Measure No. 18**) an opportunity to make recommendations for the disposition of potentially significant cultural materials found.

Mitigation Measure Monitoring Action No. 10d: A final technical report containing the results of all analyses shall be completed within one year following completion of the field work. This report shall be submitted to HCD-Planning and the Northwest Regional Information Center at Sonoma State University.

Mitigation Measure No. 11. Impacts from Road Improvements:

Notwithstanding requiring plan review of project elements in the AMZ (Mitigation Measure No. 10), potential impacts resulting from planned road improvements shown within an existing archaeological easement shall be reduced to less than significant level through construction

design that prohibits ground excavation and requires upgrading of the existing dirt road accomplished through specialized construction techniques. The technique shall ensure that no grubbing or ground disturbance occurs within the site and that the required thickness of the subgrade be the result of adding culturally sterile fill on top of existing gravel within the road's footprint. No guardrails, signs, drainage ditches, utility trenches, or other new features that require ground disturbances for installation shall be permitted to impact the site. A drainage plan for the new road shall not create deleterious runoff or other sources of erosion that would adversely affect the site. Ongoing maintenance of the road shall be conducted so as not to impact the site.

Mitigation Measure Monitoring Action No. 11a: Prior to issuance of construction permits for grading or building, the owner/applicant shall include a note on the construction plans encompassing the language contained in **Mitigation Measure No. 11** to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 11b: Prior to issuance of construction permits for roadway and drainage improvements within an existing archaeological easement, final construction plans shall be reviewed in accordance with Mitigation Measure No. 10 and include construction design elements and prohibitions specified in Mitigation Measure No. 11 The final construction plans shall be reviewed and approved by HCD-Planning.

Mitigation Measure No. 12. Impacts from Construction and Establishment of Management Housing Units:

Notwithstanding requiring plan review of project elements in the AMZ (**Mitigation Measure No. 10**), potential impacts to nearby archaeological resources resulting from the construction and establishment of the three planned management housing units shall be reduced to a less than significant level through protection during construction and the establishment of a landscape buffer in perpetuity following construction. Final construction plans shall delineate protection fencing along the limit of disturbance on the eastern side of the management housing units. Final landscape plans shall be consistent with the preliminary landscape plans (Sheet L2.1) and provide a natural landscape buffer on the eastern side of the management housing units in perpetuity. No grubbing or vegetation removal should be permitted at any time within the buffer.

Mitigation Measure Monitoring Action No. 12a: Prior to issuance of construction permits for grading or building, the owner/applicant shall include a note on the construction plans encompassing the language contained in **Mitigation Measure No. 12** to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 12b: Prior to issuance of construction permits for the three management housing units, final construction plans shall be reviewed in accordance with Mitigation Measure No. 10 and include construction design elements and prohibitions specified in Mitigation Measure No. 12. The final construction plans shall be reviewed and approved by HCD-Planning.

Mitigation Measure Monitoring Action No. 12c: Prior to issuance of construction permits for the three management housing units, the owner/applicant shall submit a final landscape plan incorporating installation of a natural landscape buffer consistent with the preliminary landscape plans. The final landscape plans shall include a statement and

signature indicating review and approval by a qualified archaeologist and shall be submitted to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 12d: Prior to final of construction permits for the three management housing units, the owner, applicant, or contractor of record shall notify HCD-Planning that installation of landscaping has been completed. This notification shall include written documentation stating that the landscape buffer area shall be maintained in perpetuity and that grubbing or vegetation removal is prohibited within the buffer area. HCD-Planning staff shall conduct a final site visit to verify successful implementation.

Mitigation Measure No. 13. Inadvertent Discoveries outside the Archaeological Management Zone (AMZ):

Due to the development's proximity to previously recorded archaeological sites, there is potential of finding buried cultural resources during construction anywhere within the Post Ranch Inn project area. In order to ensure uncovered cultural resources and/or remains are handled properly, work shall be halted within 50-meters (165-feet) of the find until evaluation by a qualified professional archaeologist occurs. If archaeological resources or human remains are inadvertently encountered, HCD-Planning and a qualified archaeologist shall be immediately contacted by the responsible individual on-site. When contacted, the project planner and archaeologist shall immediately visit the site to determine the extent of the resources and develop proper mitigation measures required for the discovery.

Mitigation Measure Monitoring Action No. 13a: Prior to issuance of construction permits for grading or building, the owner/applicant shall include a note on the construction plans encompassing the language within Mitigation Measure No. 13. The owner/applicant shall submit plans to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 13b: If human remains are accidently discovered during construction activities, there shall be no further excavation or disturbance within 50-meters (165-feet) of the find until an evaluation by a qualified archaeologist can be performed. In addition, the following actions shall occur:

- The owner, applicant, or contractor shall contact Monterey County HCD-Planning and inform the project planner of the find.
- The owner, applicant, or contractor shall contact the Monterey County Coroner to determine that no investigation of the cause of death is required.
- If the coroner determines the remains to be Native American:
 - The coroner shall contact the Native American Heritage Commission and HCD-Planning within 24-hours.
 - The Native American Heritage Commission shall identify the person or persons from the recognized local tribe of the Esselen, Salinan, Costonoan/Ohlone and Chumash tribal groups, as appropriate, to be the most likely descendent.
 - The most likely descendent may make recommendations to the landowner or person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.9 and 5097.993. When human remains are exposed, Health and

Safety Code Section 7050.5 requires that no further excavation or disturbance occurs in the area and that the County Coroner is called so that the coroner can verify that remains are not subject to medical jurisprudence. Within 24-hours of notification, the coroner calls the Native American Heritage Commission if the remains are known or thought to be Native American. The Native American Commission reports to the most likely descendant (MLD). The MLD has 48-hours to respond. All work shall halt within 50-meter radius until an osteologist can examine the remains, and a treatment plan for any said remains has been provided by the MLD.

6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Source: 1, 3, 4 & 23)				
 b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Source: 1, 3, 4 & 23) 				\boxtimes

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
 Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Source: 1, 2, 3, 4, 5, 6, 9, 15, 16, 21, 22 & 23) Refer to Division of Mines and Geology Special Publication 42. 				
ii) Strong seismic ground shaking? (Source: 1, 2, 3, 4, 5, 6, 9, 15, 16, 21, 22 & 23)		\boxtimes		

W	ould the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	iii) Seismic-related ground failure, including liquefaction? (Source: 1, 2, 3, 4, 5, 6, 9, 15, 16, 21, 22 & 23)		\boxtimes		
	iv) Landslides? (Source: 1, 2, 3, 4, 5, 6, 9, 15, 16, 21, 22 & 23)		\boxtimes		
b)	Result in substantial soil erosion or the loss of topsoil? (Source: 1, 2, 3, 4, 5, 6, 9, 15, 16, 21, 22 & 23)		\boxtimes		
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (Source: 1, 2, 3, 4, 5, 6, 9, 15, 16, 21, 22 & 23)				
d)	Be located on expansive soil, as defined in Chapter 18A of the 2007 California Building Code, creating substantial risks to life or property? (Source: 1, 2, 3, 4, 5, 6, 9, 15, 16, 21, 22 & 23)				
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (Source: 1, 2, 3, 4, 5, 6, 9, 15, 16, 21, 22 & 23)				
f)	Directly or indirectly destroy a paleontological resource or site or unique geologic feature? (Source: 1, 2, 3, 4, 5, 6, 9, 15, 16, 21, 22 & 23)				\boxtimes

Discussion/Conclusion/Mitigation:

The subject property is located within the Point Sur-Lopez Area, made up of metamorphic and plutonic rocks of pre-Cretaceous age. Topography, northwest trending ridge paralleling the coast at 1,100-1,200 feet above sea level.

Monterey County Geographic Information System (Source 6) indicates that the seismic hazard zone on the subject property has relatively unstable uplands and as illustrated in Figure 47 below, the site contains low, moderate and high erosion and landslide risks. Big Sur Coastal Implementation Plan Section 20.145.080.A.1.c.3 requires a Geologic Report for hotels and motels located in unstable upland areas. In accordance with this regulation, staff considered the 2001 geological investigation (Bond, Source 21) prepared for the Combined Development Permit approved in 2002 (Source 16) and the preliminary investigation (Wilson, Source 22) submitted with the application. The reports include a review of the site's geologic conditions,

analysis of the constraints in light of the project scope of work, conclusions, and recommendations.

As dicussed in Section II.A – Project Description: Future Phase Facility Improvements, of this Initial Study, the spa, adjacent ADA compliant restroom and Sierra Mar restaurant addition will require separate entitlements not covered by this Initial Study.

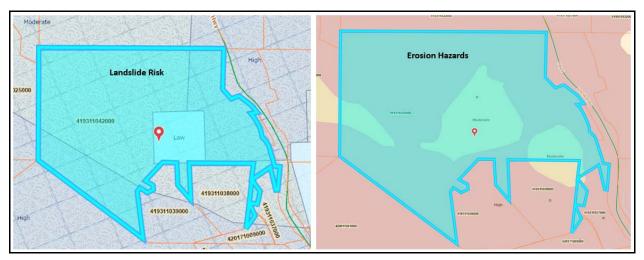


Figure 47. Landslide and Erosion Hazards

7(a.i) and (f). Conclusion: No Impact.

The 2001 geological report (Bond, Source 21) indicates that the subject property is located outside of fault zones identified under the Alquist-Priolo Special Studies Zones Act of 1972 nor does report identify paleontological resources or unique geologic features within the subject property or surrounding areas. Therefore, project implementation would result in no impact to these resources.

7(e). Conclusion: Less Than Significant Impact.

A water and wastewater capacity analysis for the project has been conducted (Source 13, Carter) and based on the findings and conclusions of the report, the project contains soils that would be capable of adequately supporting the proposed septic tanks and upgrades to the existing wastewater disposal system. Further, final plans for the wastewater facilities would be reviewed by the Environmental Health Bureau for consistency with relative regulations prior to issuance of construction permits. As such, the project would have a less than significant impact on the soils as well as the system.

7(a.ii), (a.iii), (a.iv), (b), (c) and (d). Conclusion: Less than Significant with Mitigation Incorporated.

In accordance with California Geologic Survey Special Publication 117A, Guidelines for Evaluation and Mitigating Seismic Hazards in California, the preliminary, or screening, investigation (Wilson, Source 22) evaluated the severity of potential seismic hazards and identified areas of development that would have a low potential for seismic hazards. If the screening investigation clearly demonstrates the absence of seismic hazards, it satisfies the site-investigation report requirement and no further investigation will be required. However, if the findings of the investigation cannot demonstrate the absence of seismic hazards, then the more-comprehensive quantitative evaluation needs to be conducted.

Table 1 below summarizes the evaluation results based on the development areas. The management housing, guest units and the hot tub restroom development areas are not located within mapped fault or landslide areas. As such, Wilson recommends that no further geological study is necessary. Instead, a geotechnical (soils) report will be needed to provide technical engineering recommendations for grading and structures. In accordance with the requirements of the California Building Code, a geotechnical report shall be submitted with the construction permit applicant. As such, mitigations or conditions of approval are not necessary to ensure this occurs. Therefore, development of the management housing, guest units and the hot tub restroom would result in a less than significant impact related to earthquake faults; seismic ground shaking, ground failure or landslides; soil erosion; unstable geologic units and expansive soils.

		Potential Geologic Hazard		Soil		
Development Area	Plan	Within 50' Bluff	Mapped Landslide	Mapped Fault	Report Needed	Geology Indicated
Central Services	C3.1	No	Adjacent	No	Yes	Yes
Management Housing	C3.2	No	No	No	Yes	No
Guest Units	C3.3	No	No	No	Yes	No
Gallery Parking/Restroom	C3.4	No	No	Yes	Yes	Yes
Hot Tub/Restroom	C3.5	No	No	No	Yes	No
Reception Addition	C3.6	No	Yes	No	Yes	Yes
Restroom/Spa/Restaurant	C3.7	Yes	Yes	No	Yes	Yes
Employee Housing	C3.8	No	Yes	No	Yes	Yes

 Table 1. Geological Screening Summary – From Source 22

The 2001 Geological Report (Bond, Source 21) identified hazard area of the site and the conclusions found in the screening report (Wilson, Source 22) were based on this information. **Figure 48** shows 2 major geologic hazards on the site, landslides and faults. Wilson identifies that all other development areas of the project will require a geologic investigation and soils report prior to construction. These areas and potential geologic hazards are described below.

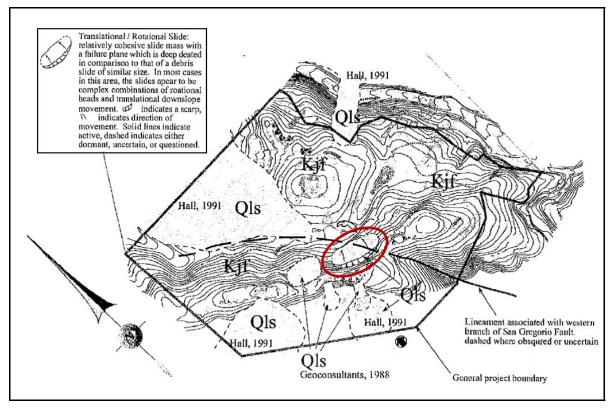


Figure 48. Fault and Landslide Map – From Source 21

Figure 49 was obtained from the California Landslide Inventory Map (Source 23). Landslide hazard data from this map is also identified below.

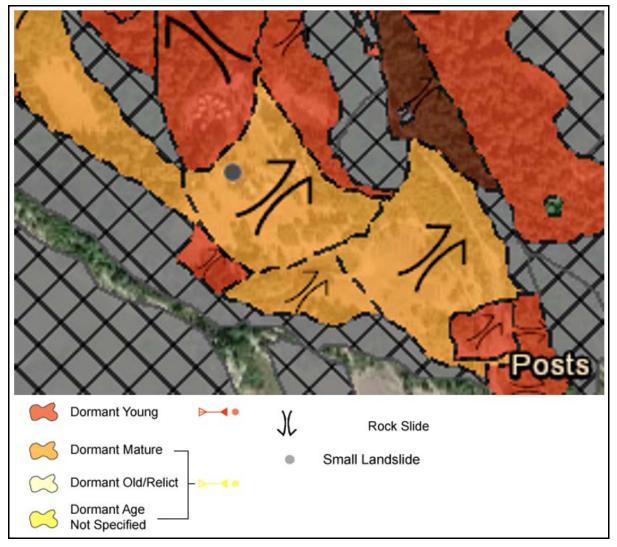


Figure 49. Landslide Map from Source 23

Central Services

The Wilson report states that there are no fault traces in this area and that although development is located on a mapped landslide, grading and drainage shall avoid disturbance of the slide area. **Figure 49** identifies this area to contain Dormant Mature⁴ landslide activity with a small slide and rockslide in proximity.

Gallery Parking and Restroom

The Wilson report states that a San Gregorio Fault lineament (identified in Source 21 and **Figure 48**) is west of the development area. **Figure 49** identifies this area to contain Dormant Mature landslide activity with a small slide and rockslide in proximity.

Reception Addition

The Wilson report states that the existing building is within an area of a mapped landslide. **Figure 49** identifies this area to contain Dormant Mature landslide activity with a small slide and rockslide in proximity.

⁴ Landforms related to the landslide have been smoothed by erosion and vegetation. The main scarp is rounded and the toe area is eroded.

Employee Housing

The Wilson report states proposed development is within an area mapped as a large landslide. **Figure 49** identifies this area to contain Dormant Young⁵ landslide activity and a rockslide to the north and Dormant Mature landslide activity with a small slide and rockslide in proximity.

Mitigation Measure No. 14. Geological Report – Central Services Area:

In order to reduce geological hazards associated with development in the Central Services area, a project and site specific comprehensive quantitative geologic evaluation/investigation shall be conducted. The investigation shall locate the mapped landslide and confirm the development will not be affected by landsliding. If necessary, recommendations for relocation or delineation of a building envelope shall be included. Prior to issuance of construction permits for the Central Services component of the project, a geological report containing the results of this investigation shall be prepared and submitted to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 14a: Prior to issuance of construction permits for grading or building in the Central Services development area, the owner/applicant shall prepare a geological report consistent with the requirements described in **Mitigation Measure No. 14**. Grading, building and structural plans shall include the recommendations identified in the geological report. The owner/applicant shall submit the geological report and construction plans to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 14b: Prior to final of construction permits for grading or building in the Central Services development area, the owner/applicant shall provide a certification letter from a licensed qualified professional that the development has been constructed in accordance with the recommendations in the final approved geological report. The review letter shall be submitted to HCD-Planning for review and approval.

Mitigation Measure No. 15. Geological Report – Gallery Parking and Restroom Area: In order to reduce geological hazards associated with development in the Gallery Parking and Restroom area, a project and site specific comprehensive quantitative geologic evaluation/investigation shall be conducted. The investigation shall determine the location of the San Gregorio Fault lineament and determine if further field exploration is required for the proposed development. Prior to issuance of construction permits for the Gallery Parking and Restroom component of the project, a geological report containing the results of this investigation shall be prepared and submitted to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 15a: Prior to issuance of construction permits for grading or building in the Gallery Parking and Restroom development area, the owner/applicant shall prepare a geological report consistent with the requirements described in **Mitigation Measure No. 15**. Grading, building and structural plans shall include the recommendations identified in the geological report. The owner/applicant shall submit the geological report and construction plans to HCD-Planning for review and approval.

⁵ Landforms related to the landslide are relatively fresh but there is no record of historic movement. Cracks in the slide mass are absent or eroded. Scarps may be prominent but are generally rounded.

Mitigation Measure Monitoring Action No. 15b: Prior to final of construction permits for grading or building in the Gallery Parking and Restroom development area, the owner/applicant shall provide a certification letter from a licensed qualified professional that the development has been constructed in accordance with the recommendations in the final approved geological report. The review letter shall be submitted to HCD-Planning for review and approval.

Mitigation Measure No. 16. Geological Report – Reception Addition Area:

In order to reduce geological hazards associated with development in the Reception Addition area a project and site specific comprehensive quantitative geologic evaluation/investigation shall be conducted. Prior to issuance of construction permits for the Reception Addition component of the project, a geological report containing the results of this investigation shall be prepared and submitted to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 16a: Prior to issuance of construction permits for grading or building in the Reception Addition development area, the owner/applicant shall prepare a geological report consistent with the requirements described in **Mitigation Measure No. 16**. Grading, building and structural plans shall include the recommendations identified in the geological report. The owner/applicant shall submit the geological report and construction plans to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 16b: Prior to final of construction permits for grading or building in the Reception Addition development area, the owner/applicant shall provide a certification letter from a licensed qualified professional that the development has been constructed in accordance with the recommendations in the final approved geological report. The review letter shall be submitted to HCD-Planning for review and approval.

Mitigation Measure No. 17. Geological Report – Employee Housing Area:

In order to reduce geological hazards associated with development in the Employee Housing area, a project and site specific comprehensive quantitative geologic evaluation/investigation shall be conducted. The investigation shall precisely locate the extent the nearby mapped landslide and determine if the proposed location of the housing units is acceptable. If necessary, recommendations for relocation or delineation of a building envelope shall be included. Prior to issuance of construction permits for the Employee Housing component of the project, a geological report containing the results of this investigation shall be prepared and submitted to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 17a: Prior to issuance of construction permits for grading or building in the Employee Housing development area, the owner/applicant shall prepare a geological report consistent with the requirements described in **Mitigation Measure No. 17**. Grading, building and structural plans shall include the recommendations identified in the geological report. The owner/applicant shall submit the geological report and construction plans to HCD-Planning for review and approval.

Mitigation Measure Monitoring Action No. 17b: Prior to final of construction permits for grading or building in the Employee Housing development area, the owner/applicant shall provide a certification letter from a licensed qualified professional that the development has been constructed in accordance with the recommendations in the final approved geological report. The review letter shall be submitted to HCD-Planning for review and approval.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly of indirectly, that may have a significant impact on the environment? (Source: 1, 2, 3, 7, 8 & 12)	r 🗌		\boxtimes	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Source: 1, 2, 3, 7, 8 & 12)			\boxtimes	

8. GREENHOUSE GAS EMISSIONS

Discussion/Conclusion/Mitigation:

According to the United States Environmental Protection Agency (EPA), greenhouse gases (GHG) are emitted by natural processes and human activities such as electricity production, motor vehicle use, and agricultural uses. These gases trap heat in the atmosphere and the elevation of GHGs has led to a trend of unnatural warming of the earth's climate, otherwise known as the "greenhouse effect". In order to reduce the statewide level of GHG emissions, the State Legislature adopted California Assembly Bill 32 (AB 32) California Global Warming Solutions Act of 2006. AB 32 established a comprehensive statewide program of regulatory and market mechanisms to achieve reductions in GHG emissions, thereby reducing the State's vulnerability to global climate change. The Monterey Bay Air Resources District (MBARD) is responsible for the monitoring of air quality and regulation of stationary sources throughout the North Central Coast Air Basin, where the proposed Project is located, by enforcing standards and regulating stationary sources through the 22012-2015 Air Quality Management Plan for the Monterey Bay Region (AQMP) (Reference 20) which evaluates a project's potential for a cumulative adverse impact on regional air quality (ozone levels).

8(a) and (b). Conclusion: Less Than Significant Impact.

As discussed in Section II.A – Project Description of this Initial Study, the Project includes an amendment to the approved General Development plan to allow the rearrangement of approved uses while staying within the buildout established. From an operational standpoint, GHG emissions would result in no change to the approved buildout. However, construction activities would contributor to a slight but temporary increase of GHG emissions. Quantifying Project emissions at this time would be too speculative. Therefore, in lieu of State guidance or locally adopted thresholds, a primarily qualitative approach was used to evaluate potential impacts.

Ambient ozone levels depend largely on the number of precursors, such as nitrogen oxide (NO_x) and reactive organic gases (ROG), emitted into the atmosphere. Implementation of the Project would result in temporary impacts resulting from construction and grading activities that require fuel combustion of construction vehicles, a primary source of NO_x and ROG emittance. Typical

construction equipment would be used for the Project and NO_x and ROG emitted from that equipment have been accommodated within the AQMP. Therefore, implementation of the Project would produce no more than the threshold of significance of 82 pounds per day of GHG precursors and these precursor emissions would have a less than significant impact on GHGs.

9. HAZARDS AND HAZARDOUS MATERIALS

W	ould the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Source: 1, 3, 4 & 16)				
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Source: 1, 3, 4 & 16)				
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Source: 1, 3, 4 & 16)				
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Source: 1, 3, 4 & 16)				
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (Source: 1, 3, 4 & 16)				
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Source:)				\boxtimes
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Source:)				\boxtimes

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

10.					
Wo	uld the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (Source: 1, 2, 3, 7, 8 & 13)			\boxtimes	
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (Source: 1, 2, 3, 7, 8 & 13)				
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i) result in substantial erosion or siltation on- or off-site? (Source: 1, 2, 3, 7, 8 & 13)			\boxtimes	
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? (Source: 1, 2, 3, 7, 8 & 13)			\boxtimes	
	iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (Source: 1, 2, 3, 7, 8 & 13)				
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (Source: 1, 2, 3, 7, 8 & 13)				

10. HYDROLOGY AND WATER QUALITY

Discussion/Conclusion/Mitigation:

Potable and fire suppression water is provided to Post Ranch Inn by a private water system. The existing system includes 5 domestic wells, 2 water tanks and a main distribution system. Irrigation water is supplied by separate systems containing wells and small decentralized storage tanks.

There are 5 decentralized wastewater systems consisting of the Main Treatment System, the original Employee Housing Units enhanced wastewater system, the Boneyard enhanced wastewater treatment System, the Molera or North Ridge standard septic system, and a small standard system. There is also an existing greywater system to handle the water from the central laundry facility.

A Capacity Analysis for Water and Wastewater Systems report (Carter, Source 13) was prepared for the project and submitted with the application. The report analyzed the capacity of the existing water and wastewater systems and how the increased demands on the system resulting from project implementation. Stormwater runoff captured from existing impervious surfaces is conveyed to onsite retention areas allowing the water to seep into the groundwater.

10(d). Conclusion: No Impact.

The subject property does not contain or located adjacent to a lake, harbor, or bay and therefore would not be susceptible to impacts from seiche. The area of development is located over 1,000 above sea level so tsunami inundation would be unlikely.

10(a), (b), (c) and (d). Conclusion: Less Than Significant Impact.

The project plans include preliminary stormwater and erosion control plans that delineate stormwater mitigation features (drainage retention areas) and drainage swales where appropriate and best management practices to ensure dirt and sediment are controlled during construction. HCD-Environmental Services has applied standard conditions of approval requiring the owner/applicant to submit Stormwater Management Plan, prepared by a registered civil engineer or other qualify professional, designed in conformance with the water resources general policies of the Big Sur Land Use Plan (3.4.2.2) and the California Coastal Commission's water quality guidance for permit applicants (<u>http://www.coastal.ca.gov/water-quality/permits/</u>) and submitting certification from a registered civil engineer or licensed contractor that stormwater management facilities have been constructed in accordance with the approved Stormwater Management Plan.

Monterey County Code Chapter 16.12 – Erosion Control requires HCD-Environmental Services to implement regulations for the purpose of eliminating and preventing conditions of accelerated erosion that have led to, or could lead to, degradation of water quality, loss of fish habitat, damage to property, loss of topsoil or vegetation cover, disruption of water supply, increased danger from flooding.

The project as proposed, conditioned and regulated through the construction permit process result in a less than significant impact relative to water quality standards, wastewater discharge, groundwater, runoff and drainage and erosion.

11. LAND USE AND PLANNING

	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No
Would the project:	Impact	Incorporated	Impact	Impact
a) Physically divide an established community? (Source: 1, 2, 3, 4, 5, 6, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 & 19)				\boxtimes
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Source: 1, 2, 3, 4, 5, 6, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 & 19)		\boxtimes		

Discussion/Conclusion/Mitigation:

As discussed in Section II.A – Project Description, of this Initial Study, the project consists of an amendment to the approved General Development Plan to improve the operation of the facilities

as to better meet the needs of PRI's clients. No change or increase of the establish use is proposed.

11(a). Conclusion: No Impact.

The project includes modifications to improvements that were either approved development or accessory to approved established uses of the site. Therefore, the project would have no impact relative to creation of physical barriers that would change the connectivity of the site, local and/or regional area.

11(b). Conclusion: Less Than Significant Impact.

As illustrated in **Figure 20**, Parcels A and C have 2 land use designations: Watershed & Scenic Conservation and Rural Community Center. The zoning designations for Parcel A are Visitor Serving Commercial with Design Control and Historic Resource overlays, coastal zone or "VSC-D-HR(CZ)" and Watershed Scenic Conservation, 40 acre minimum with Design Control and Historic Resource overlays, coastal zone or "WSC/40-D-HR(CZ)". Parcel C is zoned Watershed Scenic Conservation, 40 acre minimum with a Design Control overlay, coastal zone or "WSC/40-D(CZ)".

The proposed project is consistent with the allowed and established use of the site. The project would have the potential to result in potential impacts relative to biological and cultural resources as well as potentially result in geologically related hazards. Policies and regulations addressing these issues, as contained in the 1982 Monterey County General Plan, Big Sur Coast Land Use Plan, Big Sur Coast Coastal Implementation Plan and Monterey County Coastal Zoning Ordinance (Title 20), have been incorporated as conditions of approval as appropriate. Avoidance, protection and/or restoration measures have also been incorporated to ensure consistency with policy and reduce environmental impact to a less than significant level.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (Source: 1, 3, 6, & 9)				\boxtimes
 b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (Source: 1, 3, 6, & 9) 				\boxtimes

12. MINERAL RESOURCES

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

13. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of th project in excess of standards established in the loca general plan or noise ordinance, or applicable stand of other agencies? (Source: 1, 2, 3 & 6)	e al			
b) Generation of excessive groundborne vibration or groundborne noise levels? (Source: 1, 2, 3 & 6)				
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a has not been adopted, within two miles of a public airport or public use airport, would the project expo people residing or working in the project area to excessive noise levels? (Source: 1, 2, 3 & 6)	plan			

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

14. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (Source: 1 & 16)				
 b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (Source: 1 & 16) 				\boxtimes

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

15. PUBLIC SERVICES

Would	d the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
provis faciliti faciliti enviro servic	antial adverse physical impacts associated with the ion of new or physically altered governmental les, need for new or physically altered governmental les, the construction of which could cause significant nmental impacts, in order to maintain acceptable e ratios, response times or other performance ives for any of the public services:				
a)	Fire protection? (Source: 1, 2, 3 & 4)				\boxtimes
b)	Police protection? (Source: 1, 2, 3 & 4)				\boxtimes
c)	Schools? (Source: 1, 2, 3 & 4)				\boxtimes
d)	Parks? (Source: 1, 2, 3 & 4)				\boxtimes
e)	Other public facilities? (Source: 1, 2, 3 & 4)				\boxtimes

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

16. RECREATION

W	ould the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Source: 1, 2, 3, 4, 6, 15 & 16)				
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (Source: 1, 2, 3, 4, 6, 15 & 16)			\boxtimes	

Discussion/Conclusion/Mitigation:

The background information discussion contained in Section II.B – Surrounding Land Uses and Environmental Setting, of this Initial Study, discloses that the PRI obtained approval to increase and improve access trails and recreation areas (Source 16). As illustrated in **Figure 15**, the project includes ADA accessibility improvements to a segment, approximately 800 linear feet, of an existing public trail that begins at the southeast portion of Parcel A, traverses the northeast portion of Parcel C and continues back through Parcel A until terminating at the northeast corner of the property (see **Figure 31**).

16(a) and (b). Conclusion: Less than Significant Impact. Improvement of ADA accessibility of the trail segment would enhance access to all members of the public, resulting in the potential increase of use of the facility. Improvements are limited to the existing trail and expansion of the path is not proposed. However, due to ADA-specific construction requirements, this increase would have a less than significant impact resulting from deterioration of the trail.

Improvements to the trail segment would result in a temporary impact on the use of a portion of the public trail. However, due to the limited area and the temporary nature, this impact would be less than significant. Although the trail improvements would have a less than significant impact to recreation, potential impacts to biological resources resulting from land disturbance have been identified. Discussion of impacts and mitigation measures can be found in Section VI.4 – Biological Resources, of this Initial Study.

17.	TRANSPORTATION/TRAFFIC
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	Detentialle	Less Than Significant	I There	
Would the project:	Potentially Significant Impact	With Mitigation Incorporated	Less Than Significant Impact	No Impact
 a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Source: 1, 2, 3, 4, 6, 12, 15 & 16) 				
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (Source: 1, 2, 3, 4, 6, 12, 15 & 16)			\boxtimes	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Source: 1, 2, 3, 4, 6, 12, 15 & 16)				
d) Result in inadequate emergency access? (Source: 1, 2, 3, 4, 6, 12, 15 & 16)				\boxtimes

Discussion/Conclusion/Mitigation:

As discussed in Section II.A – Project Description of this Initial Study, the project includes an amendment of an approved General Development Plan to allow reconfiguration of approved but not yet constructed. In accordance with BSC LUP Policies 4.1.3.C.2 and 3, a traffic assessment prepared by Keith Higgins of Mott MacDonald, dated November 16, 2016 (Source 12, Higgins) was prepared to identify any project related impacts and make necessary recommendations.

17(a), (c), and (d). Conclusion: No Impact.

The traffic assessment (Source 12, Higgins) compared the existing traffic conditions with the project trip generation rates applied for the development. Higgins concluded that the project would have no net increase in traffic, resulting in no impact to the public street system. Therefore, the project would not conflict with the BSC LUP addressing transportation. The project includes interior roadway improvements within the resort. The project does not include

any offsite improvements such as modification of the existing driveway or creation of a new driveway. As discussed above, project implementation would be consistent and compatible with the existing permitted use. As such, the project would not result in an increased traffic hazard or inadequate emergency access.

17(b). Conclusion: Less Than Significant Impact.

As discussed in Section II.A – Project Description of this Initial Study, the project includes construction of 12 employee housing units that were approved but not constructed. The Employee Housing Plan (EHP) identifies that of the 180 PRI employees, 61 live onsite in employee housing. The project would provide onsite employee housing for up to 14 additional employees. Further, the EHP indicates that approximately 27 PRI employees that reside onsite also work part-time elsewhere in Big Sur. Monterey-Salinas Transit schedule for the 22-Big Sur line shows 1 stop at the intersection of PRI's driveway and Highway 1 with 3 scheduled stops per day at over 3 hour intervals. Based on a qualitative analysis of this information, the project would result in a reduction of vehicle miles traveled. In accordance with CEQA section 15064.3(b), projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or (Source: 1, 2, 3, 4, 6, 10, 15 & 16)				\boxtimes
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Source: 1, 2, 3, 4, 6, 10, 15 & 16)		\boxtimes		

18. TRIBAL CULTURAL RESOURCES

Discussion/Conclusion/Mitigation:

As discussed in Section II.B – Existing Archaeological/Tribal Cultural Resources and Section VI.5. Environmental Checklist – Cultural Resources of the Initial Study, the subject property has a high archaeological sensitivity and there are known resources on the site (Source 3).

18(a.i). Conclusion: No Impact.

The subject property has a Historical Resource or "HR" overlay district. Pursuant to Monterey County Coastal Zoning Ordinance section 20.54.010, the purpose of the district is to provide incentives and regulation for the protection, preservation, enhancement, and perpetuation of those structures and areas of historic, architectural and engineering significance which contribute to the historic heritage of Monterey County and to encourage conservation of the County's important representative and unique archaeological sites and features. In compliance with condition 28 of the 1989 permit (Planning Commission Resolution No. 89-176), the subject property was rezoned to add a Historic Resources overlay district to ensure protection of identified archaeological resources on the site. However, the subject property or these resources are not included on the Monterey County Register of Historic Resources. Therefore, the project would result in no impact to tribal resource listed in the California or Monterey County Register of Historic Resources.

18(a.ii). Conclusion: Less than Significant Impact with Mitigation Incorporated.

In accordance with Public Resources Code Section 21080.3.1, HCD Planning staff notified the Ohlone Costanoan Esselen Nation Tribe (OCEN) on October 25, 2018 that environmental review for the project was required and staff was available for consultation. On December 11, 2018, HCD staff met with OCEN and was notified that based on the documented tribal resources protected on the site, specific project elements would have the potential to impact tribal cultural resources. As such, mitigation measure 18 was recommended by OCEN to reduce the potential tribal cultural impact to less than significant.

Mitigation Measure No. 18. Protection of Cultural Resources and Sacred Places.

In order to reduce potential impacts to cultural resources and sacred places, earth disturbance activities shall be observed by a Native American Tribal Monitor approved by the Esselen Tribe of Monterey County. If more than one earth moving equipment is deployed at different locations the same time, more than one tribal monitor shall be present during those periods. If at any time, potentially significant cultural resources, sacred places, or intact features are discovered, the contractor shall temporarily halt work until the find can be evaluated by the tribal monitor and archaeological monitor. If the find is determined to be significant, work shall remain halted until mitigation measures have been formulated, with the concurrence of HCD-Planning, and implemented. This mitigation shall work in conjunction with the measure for protection of archaeological resources listed in **Mitigation Measure No. 10**.

Mitigation Monitoring Action No. 18a: Prior to issuance of construction permits for grading or building, the owner/applicant shall include a note on the construction plans encompassing the language contained in **Mitigation Measure No. 18**. The owner/applicant shall submit said plans to HCD-Planning for review and approval.

Mitigation Monitoring Action No. 18b: Prior to issuance of construction permits for grading or building, the owner/applicant shall submit a contract with a Native American Tribal Monitor approved by Esselen Tribe of Monterey County to HCD-Planning for review and approval. The contract shall outline logistics for monitoring during earth disturbance activities as well as how uncovered cultural resources will be handled, in coordination with the project archaeologist.

Mitigation Monitoring Action No. 18c: An on-site preconstruction meeting shall be held between the applicant, the archaeologist, and Native American Tribal monitor, and contractor to discuss and assure the understanding of the mitigation measures required of this permit and scheduling of construction with regard to monitoring. Prior to issuance of any construction permits for grading or construction, the preconstruction meeting between all parties shall be conducted and a letter summarizing what was discussed shall be submitted to HCD-Planning.

Mitigation Monitoring Action No. 18d: During earth disturbance activities, the Native American Tribal Monitor shall be onsite observing the work, consistent with the approved contract discussed in **Mitigation Measure No. 18b**. Prior to final of construction permits for grading or building, the owner/applicant shall submit a letter for the Native American Tribal Monitor verifying all work was done consistent with the contract to HCD-Planning.

		Potentially	Less Than Significant With	Less Than	
Would the project:		Potentially Significant Impact	Mitigation Incorporated	Significant Impact	No Impact
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Source: 1, 2, 3, 7, 8 & 13)				
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (Source: 1 & 13)				
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Source: 1, 2, 3, 7, 8 & 13)			\boxtimes	

19. UTILITIES AND SERVICE SYSTEMS

Discussion/Conclusion/Mitigation:

As discussed in section II.A Project Description – Current Phase Site and Infrastructure Improvements, of this Initial Study, the subject property has an established water system and wastewater system. A Capacity Analysis for the Water and Wastewater Systems (Carter, Source 13) was prepared for the project which analyzed the existing facility capacity, estimated the existing and future demands of these systems relative to the proposed improvements and provided recommendations based on the General Development Plan's buildout to ensure these facilities operate at an acceptable level.

19(b). Conclusion: No Impact.

Sheet G3.0 of the project plans (Source 1) illustrates the approximate locations of the existing water system components. The system is comprised of 5 domestic water wells, a 105,000 gallon water storage tank, a 140,000 gallon water storage tank and a distribution system. Water for landscape irrigation is provided by separate wells and smaller dedicated storage tanks. Wells for potable water produce approximately 6,201 gallons per day (gdp) and have the capability to produce 80,000 gpd. on the average.

The Carter report finds that the project would result in an increase to the water demand by approximately 1,710 gpd which is well within the maximum capacity of the water system. Therefore, the project would result in no impact to the existing water supply for the subject property.

19(c). Conclusion: Less Than Significant Impact.

The existing wastewater system for Post Ranch consists of 5 decentralized wastewater systems: 1) the Main Treatment System; 2) the Original Employee Housing Units wastewater system; 3) the New Employee Housing System (aka Boneyard); 4) the Molera septic system (aka North Ridges System); and 5) a small system to service the pool area. Systems 4 and 5 are standard septic tanks and leachfields while systems 1, 2, and 3 include enhanced treatment and leachfield disposal.

	Main	<mark>Original</mark> EHU	New EHU	Molera	<mark>Pool</mark> Area
Capacity	6,300 gpd				
Average Disposal	5,900 gpd		412 gpd	1,120 gpd	
Increased Disposal	425gpd		755 gpd	50 gpd	

The Main Treatment System septic

19(a). Conclusion: Less Than Significant with Mitigation Incorporated.

Although the existing water and wastewater facilities would result in no or less than significant impact relative to capacity, the project includes the expansion of the existing wastewater treatment system, construction of additional storm water facilities which would have the potential to result in an environmental impact.

As discussed in section VI.4. Environmental Checklist – Biological Resources of this Initial Study, expansion of wastewater and stormwater drainage facilities relative to the project would have the potential to impact biological resources. However, with implementation of mitigation measure Nos. 1 through 8, these impacts would be reduced to less than significant level.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan? (Source: 1 & 2)				\boxtimes
 b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (Source: 1, 2, 13 & 20) 				
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (Source: 1, 2, 13 & 20)				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? (Source: 1)				\boxtimes

Discussion/Conclusion/Mitigation:

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather and other relevant factors (Public Resources Code [PRC] 4201-4204, California Government Code 51175-89). The primary factors that increase an area's susceptibility to fire hazards include topography and slope, vegetation type and vegetation condition, and weather and atmospheric conditions. The project site is relatively flat with minimal wildland fire fuel. The project would not add trees to the sites and would not substantially alter the site to exacerbate wildfire hazards.

In California, responsibility for wildfire prevention and suppression is shared by federal, state and local agencies. Federal agencies have legal responsibility to prevent and suppress wildfires in Federal Responsibility Areas (FRAs). CAL FIRE prevents and suppresses wildfires in State Responsibility Area (SRA) lands. These are non-federal lands in unincorporated areas with watershed value, are of statewide interest, defined by land ownership, population density, and land use. CAL FIRE maps fire hazards based on zones, referred to as Fire Hazard Severity Zones. Each of the zones influence how people construct buildings and protect property to reduce risk associated with wildland fires. Under state regulations, areas within Very High Fire Hazard Severity Zones (VHFHSZ) must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life within these areas. The project site is in an SRA and within a High FHSZ.

20(a) and (d). Conclusion: No Impact.

The Project includes an amendment to an approved General Development Plan and would not interfere with the implementation of the Multi-Jurisdictional Hazard Mitigation Plan adopted for the County of Monterey. The subject property is located a northwest trending ridge paralleling

the coast at 1,100-1,200 feet above sea level. The improvements on the property would not be located downslope or downstream of developed areas.

20(b) and (c). Conclusion: Less Than Significant Impact.

As part of a previous permit (Planning File No. PC-6336, Resolution No. 89-176) for PRI, water storage facilities, additional fire hydrants and the Big Sur Volunteer Fire Brigade building were established on the site. In addition, the project application (Fuel Management Plan, Source 1) includes a preliminary Fuel Management Plan (see **Figure 50**) that delineates a 30-foot green zone from all the structures. Once implemented, this zone would ensure shrubs not create a horizontal contiguous space and trees not create a vertical contiguous space and that the area be maintained (i.e. ongoing flammable, dead vegetation). Outside of this green zone is a management zone (up to 100 feet). Implementation of this zone would ensure weeds and poison oak be continuously mowed.

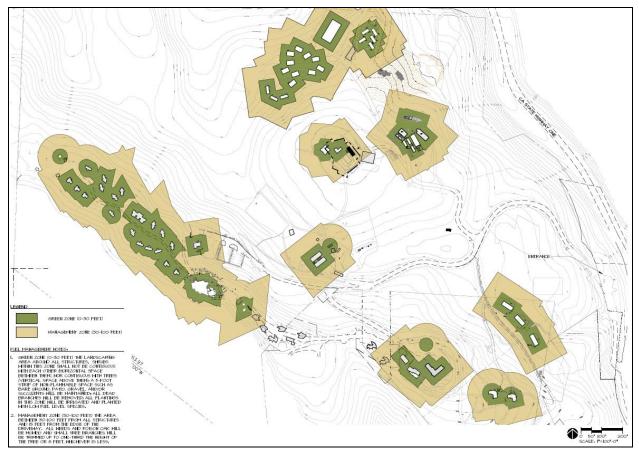


Figure 50. Overall Fuel Management Plan from Source 23

The Water and Wastewater Capacity Analysis report (Source 13) states that the required storage capacity for fire suppression depends on the largest building served by the system; in this case, the Sierra Mar restaurant (approximately 5,500 square feet after proposed addition). The report identifies that based on the California Fire Code, the required fire flow would be 1,500 gallons per minute for 2 hours, or a total of 180,000 gallons. There are 2 existing water storage tanks on the property, a 105,000 gallon and 140,000 gallon tank with total water storage of 245,000 gallons. Therefore, there is sufficient storage capacity to serve the property.

The project plans (Water System Improvement Plans, Source 1) proposes a new fire truck turnaround at the new employee housing adjacent to the existing, new fire hydrants at the gallery, central services area and new management housing units.

In accordance with applicable building code and fire regulations, all construction permit plans for the project would be reviewed to ensure compliance with the regulations. Considering, the existing fire suppression facilities on the site and the project as proposed, would have a less than significant impact related to wildfires.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

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

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Source:)				
b) Have impacts that are individually limited, but cumulatively considerable? (Source:) ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? (Source:)				
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (Source:)		\boxtimes		

Discussion/Conclusion/Mitigation:

As discussed in Section II.A – Project Description, of this Initial Study, the project consists of an amendment to the approved General Development Plan to improve the operation of the facilities as to better meet the needs of PRI's clients. No change or increase of the establish use is proposed.

VII(a). Conclusion: Less than Significant with Mitigation Incorporated.

As identified in Sections VI.4, 5 and 17 of this Initial Study, the project would have the potential to impact biological, cultural and tribal cultural resources. Where appropriate, mitigation measures have been identified and through implementation, impacts to these resources would be

reduced to a less than significant level. In this particular case, there are no potentially significant impacts that are mitigatable.

VII(b). Conclusion: Less than Significant Impact.

As identified in Sections VI.4, 5, 7 and 17 of this Initial Study, the project would have the potential to result in a less than significant impact to biological, cultural, geological and tribal cultural resources with mitigation measures incorporated. However, due to the rural and somewhat isolated location of the subject property and the minimal amount of development that is proposed, currently and in the foreseeable future, it is reasonable to assume the temporary (i.e. construction) and operational components would have a less than cumulative impact to the above resources with the identified mitigations incorporated.

VII(c). Conclusion: Less than Significant with Mitigation Incorporated.

As identified in Section VI.7 of this Initial Study, the project would have the potential to result in a less than significant impact related to geological hazards. As such, mitigation measures have been identified and through their implementation, these impacts would be reduced to a less than significant level. In this particular case, there are no potentially significant impacts relative to geological hazards that are mitigatable.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

VIII. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

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

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

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

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

Evidence: Based on the record as a whole as embodied in the HCD-Planning files pertaining to PLN160047 and the attached Initial Study / Proposed Mitigated Negative Declaration.

IX. SOURCES

- 1. Post Ranch Project Application and Plans
- 2. 1982 Monterey County General Plan
- 3. Big Sur Coast Land Use Plan
- 4. Monterey County Coastal Implementation Plan, Part 3 Regulations for Development in the Big Sur Coast Land Use Plan
- 5. Monterey County Coastal Implementation Plan, Part 1 Title 20 of the Monterey County Code (Zoning Ordinance)
- 6. Monterey County Geographic Information System (GIS)
- 7. CEQA Air Quality Guidelines, Monterey Bay Unified Air Pollution Control District, Revised February 2008
- 8. The 2012-2015 Air Quality Management Plan (AQMP), including the 1991 AQMP and the 2009-2011 Triennial Plan Revision
- 9. Site Visit conducted by the project planner on February 8, 2018.
- "Cultural Resources Report Post Ranch Inn Development Plan", dated November 2016 and "Supplement to Cultural Resources Report", dated March 2, 2018 (Monterey County Document No. LIB160406), prepared by John Schlagheck, M.A. PRA, Holman & Associates Archaeological Consultants, San Francisco, CA
- "Supplemental Biological Assessment of Post Ranch Property", dated November 10, 2016 and "Post Ranch: Biological Monitoring Clarifications for Incomplete Letter", dated May 9, 2018 (Monterey County Document No. LIB160407), prepared by Fred Ballerini Biological and Horticultural Services, Pacific Grove, CA
- 12. "Traffic Analysis for Post Ranch Inn Upgrades", dated November 16, 2016 (Monterey County Document No. LIB160409), prepared by Keith Higgins, P.E., T.E., Mott Macdonald, Gilroy, CA
- 13. "Capacity Analysis for the Water and Wastewater Systems for General Development Permit", dated November 17, 2016 (Monterey County Document No. LIB180268), prepared by Adrienne Carter, P.E., Fall Creek Engineering, Inc., Santa Cruz, CA
- 14. "Low-Effect Habitat Conservation Plan for the Smith's Blue Butterfly and California Red-Legged Frog at the Post Ranch Inn (APN 419-311-034) in Big Sur, Monterey County, California", Draft 3.7 (USFWS Revision 8), dated March 2006, prepared by Richard A. Arnold, Ph. D, March Allaback, John A. Gilchrist, and Jeff Norman
- 15. Google Earth Imagery dated 2018 36°13'52.29" N 121°46'13.87" W, Elevation at 1073ft., Eye Alt. 4354ft
- 16. PLN970492, Post Ranch LP Combined Development Permit and General Development Plan, Board of Supervisors Resolution No. 02-269, dated June 25, 2002
- 17. "Post Ranch Inn Employee Housing Plan", prepared by Arden Handshy for Combined Development Permit PLN970492

- 18. "Construction Permits for Employee Housing", Monterey County File Nos:
 - a. Permit No. 14CP01200, Bldg No. 1, Units 11A/11B, Finaled 2/16/16
 - b. Permit No. 14CP02179 Bldg No. 2, Units 12A/12B, Finaled 2/16/16
 - c. Permit No. 14CP02180 Bldg No. 3, Units 13A/13B, Finaled 2/16/16
 - d. Permit No. 14CP02181 Bldg No. 4, Units 14A/14B, Finaled 2/16/16
 - e. Permit No. 14CP02182 Bldg No. 5, Units 15A/15B, Finaled 5/23/16
 - f. Permit No. 14CP02183 Bldg No. 6, Units 16A/16B, Finaled 2/16/16
- 19. "Construction Permits for Visitor Serving Units", Monterey County File Nos:
 - a. Permit No. BP061440, Cliff Unit A, Finaled 4/1/08
 - b. Permit No. BP061441, Cliff Unit B, Finaled 4/22/08
 - c. Permit No. BP061442, Peak Unit A, Finaled 4/22/08
 - d. Permit No. BP061443, Peak Unit B, Finaled 4/1/08
 - e. Permit No. BP061444, Coast Unit A, Finaled 4/22/08
 - f. Permit No. BP061445, Coast Unit B, Finaled 4/22/08
 - g. Permit No. BP061446, Coast Unit C, Finaled 4/1/08
- 20. California Department of Forestry and Fire Protection's Fire Hazard Severity Zones Maps <u>https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414</u>
- 21. "Engineering Geologic Investigation of Post Ranch Inn", prepared by Steven Bond and Associates Inc., September 4, 2001, for Combined Development Permit PLN970492.
- 22. "Preliminary Screening Investigation", dated April 14, 2017 (Monterey LIB180430) prepared by Yvette M. Wilson, P.E., Rock Solid Engineering, Inc., Watsonville, CA
- 23. State of California Department of Conservation, California Geological Survey California Landslide Inventory Map <u>https://maps.conservation.ca.gov/cgs/lsi/app/</u>