

Housing Element Update, Zoning Ordinance Amendments, and General Plan Amendments

Draft Environmental Impact Report

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prepared by

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Executive Summary

The proposed project analyzed in this Draft Environmental Impact Report (DEIR) is the City of Pacific Grove Housing Element Update, Zoning Ordinance Amendments, and General Plan Amendments (hereinafter referred to as the "project" or "proposed project"). The "Housing Element Update" encompasses the 6th Cycle Housing Element. The "Zoning Ordinance Amendments" covers rezonings and upzonings determined to be necessary as a result of the Housing Element Update, additional rezonings proposed by the City, and the inclusion of objective design standards. The "General Plan Amendments" encompass updates to the Health and Safety Element and Land Use Element of the General Plan. This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

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Project Location

The City of Pacific Grove encompasses approximately 2.9 square miles (or approximately 1,830 acres) on the Monterey Peninsula in northern Monterey County (Figure ES-1). The project area includes all areas within the city limits, as shown in Figure ES-2. Because potential new development facilitated by the project would be focused on the housing sites identified in the Housing Element, in upzoning areas, and on additional parcels not included in the Housing Element Site Inventory, the DEIR includes a particular emphasis on those sites and parcels, as depicted in Figure ES-3. The numbered sites in Figure ES-3 correspond to the Housing Element Site Inventory numbering convention.

The project area consists of multiple areas within the city, including the Downtown District; the Central-Eardley Commercial District; The Forest Hill Commercial District; the Dennett, Sinex, and Grove Acre Neighborhood; and other areas in the city. The project involves amendments to zoning and land use regulations to facilitate housing development. The affected areas are primarily urbanized and designated for commercial or mixed-use development. The proposed changes would modify zoning designations, density requirements, and development standards to accommodate increased residential capacity while maintaining consistency with the City's General Plan and state housing mandates.

Figure ES-1 Regional Location

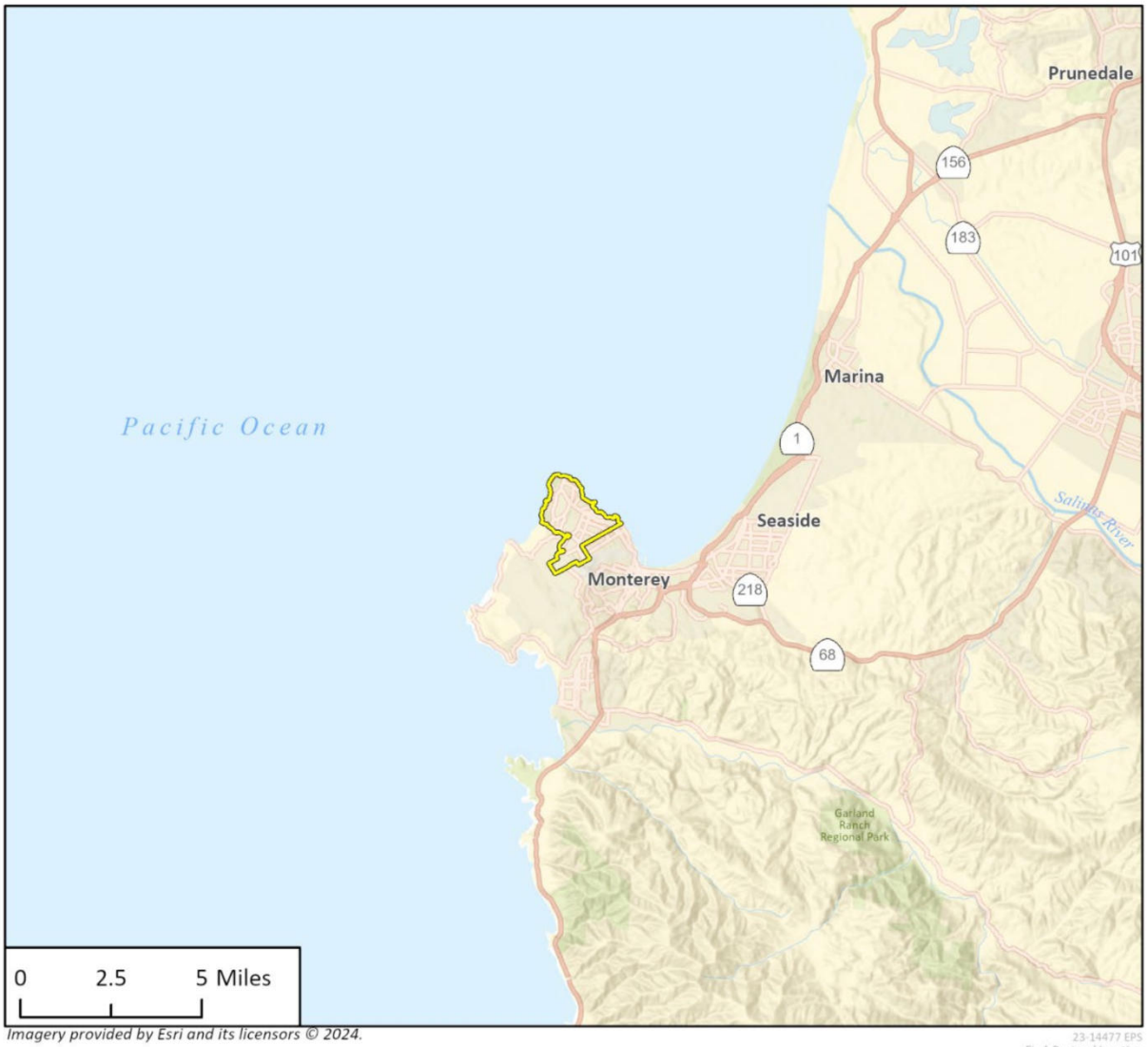
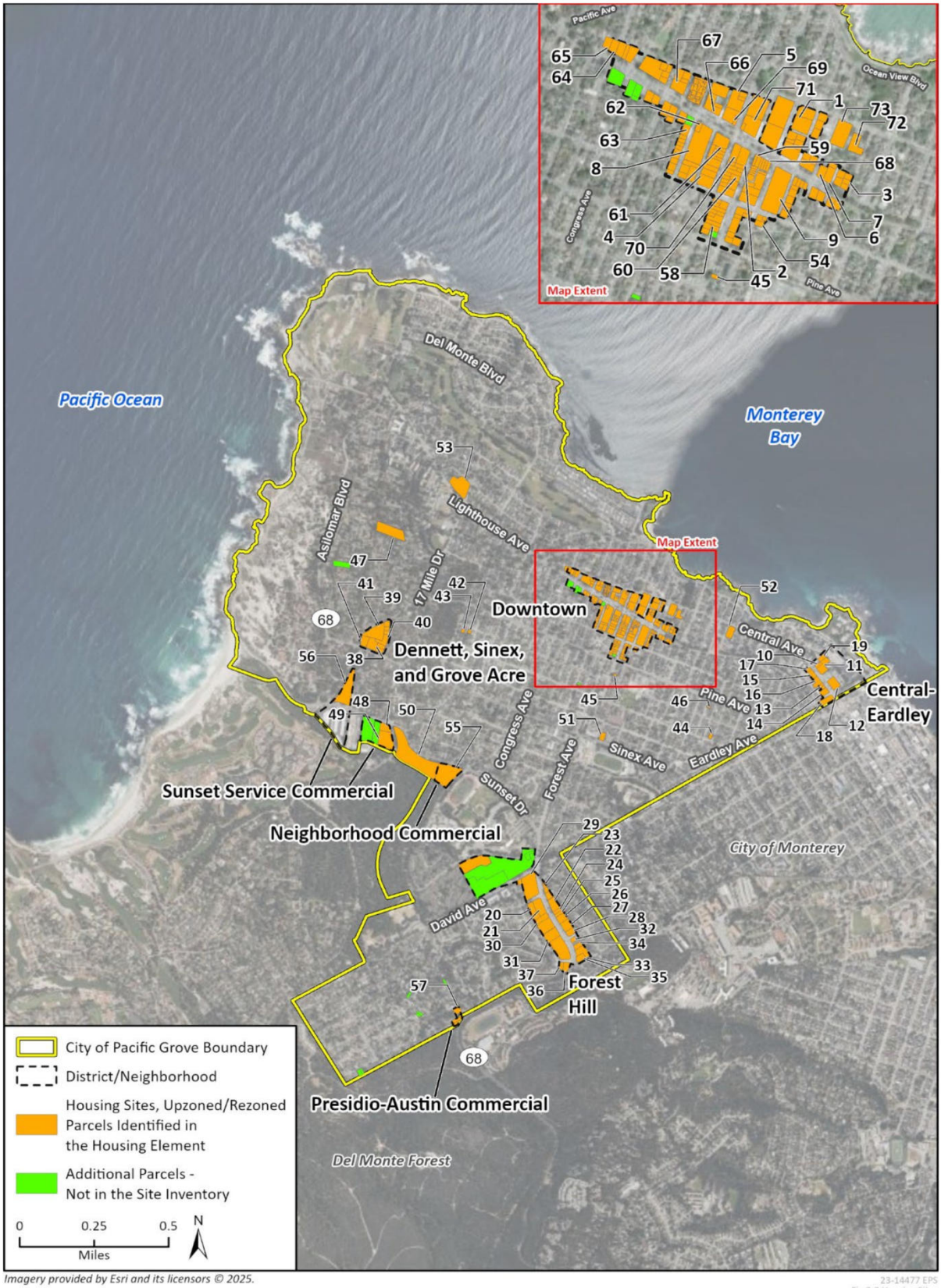


Figure ES-2 Project Area



Figure ES-3 Housing Sites, Upzoning and Rezoning Areas, and Additional Parcels



Project Description

This DEIR has been prepared to examine the potential environmental effects of the Pacific Grove Housing Element Update, Zoning Ordinance Amendments, and General Plan Amendments. The following is a summary of the full project description, which can be found in Chapter 2, *Project Description*.

The proposed project consists of the following components:

- Updating and adopting the City's Housing Element
- Amending the City's Zoning Code and zoning map to:
  - Increase the maximum allowed development density and establish a minimum residential density of the Downtown Commercial (C-D) Zoning Districts and Forest Hill Commercial (C-FH) Zoning Districts ("upzoning")
  - Remove the requirement that maximum allowed development density in C-1 and C-2 zones outside the Coastal Zone are equal to that of the nearest General Plan residential land use category ("upzoning")
  - Rezone the Dennett, Sinex, and Grove Acre District to allow higher density residential development ("rezoning")
  - Rezone one housing site (Site 50) to allow higher density residential development ("rezoning")
  - Update the mixed-use and residential development standards which constrain housing from meeting maximum densities (e.g., reduce parking requirements for multi-family housing and establish appropriate development standards to achieve the increased maximum allowable densities in the C-D and C-FH Zoning Districts)
  - Include objective design standards for multi-family residential and mixed-use development
  - Address administrative provisions including amendments to permitting processes to support residential streamlining requirements including establishing a process to allow for by right processing of projects that include a specified number of affordable housing units
  - Incorporate state mandated affordable housing requirements including use requirements for single room occupancy housing, parking standards for supportive housing and emergency shelters, use requirements for low barrier navigation centers, compliance standards for employee housing, use standards for large residential care facilities, and objective standards for reasonable accommodation
  - Update development standards for accessory dwelling units (ADU) to comply with state ADU law
  - Develop a local density bonus program to offer incentives beyond those required by state density bonus law
- Amend the City's General Plan Land Use Element and land use map to ensure consistency with the Housing Element Update and zoning amendments
- Amend the City's Health and Safety Element to comply with recent state legislation

The proposed project includes updates to zoning a regulations, modifications to residential and mixed-use development standards, and implementation of state-mandated housing policies. Specific changes include reducing parking requirements for multi-family housing, streamlining permitting processes, and incorporating objective design standards for new residential projects.

Additional amendments address ADU regulations, density bonus incentives, and compliance with state affordable housing laws. These updates aim to enhance housing opportunities, increase residential density, and align local policies with state housing requirements.

The following sections are a summary of the project components from the full project description, which can be found in Chapter 2, *Project Description*.

Housing Element Update

The draft 6th Cycle Housing Element is available on the City's website: www.cityofpacificgrove.org/HousingElement

As required by state law, the Housing Element includes the following components:

- **Introduction** – Outlines the City's housing vision, legal framework, Housing Element requirements, its integration with other General Plan elements, and public participation efforts.
- **Community Profile** – Provides demographic, household, and housing stock data, including current and projected needs and special populations.
- **Housing Needs and Constraints** – Analyzes factors affecting housing production and preservation, including regulations, infrastructure, market conditions, and financing.
- **Housing Resources** – Details the City's RHNA allocation, progress toward meeting it, remaining needs, site inventory, and site suitability and affordability.
- **Affirmatively Furthering Fair Housing** – Reviews fair housing issues, enforcement practices, and compares Pacific Grove to broader county trends.
- **Housing Plan** – Establishes goals and programs to preserve housing, expand access, address special needs, promote equity, and support sustainability.
- **Appendices** – Includes site inventory (A), fair housing assessment (B), review of 5th Cycle accomplishments (C), and public engagement summary (D).

According to state law, a housing element must address the City's fair share of the regional housing need and specific state statutory requirements and must reflect the vision and priorities of the local community. In October 2022, the Association of Monterey Bay Area Governments (AMBAG) adopted a RHNA plan, allocating 1,125 units for Pacific Grove, of which 599 units must be affordable to low-income or very low-income households. The California Department of Housing and Community Development (HCD) requires local jurisdictions to identify sufficient housing sites to cover the jurisdiction's 6th Cycle RHNA. HCD also recommends that jurisdictions provide additional buffer capacity above the RHNA. The "No Net Loss" law (Government Code Section 65863) requires maintenance of sufficient sites to meet the RHNA for all income levels throughout the planning period. The recommendation from HCD is to adopt a housing Site Inventory with a buffer of at least 15 to 30 percent over the allocated RHNA, in case constraints limit building on any given site. When accounting for pending and approved projects, estimated development of accessory dwelling units, and a 20 percent buffer to facilitate compliance with the "No Net Loss" law, the City must demonstrate its ability to allow for the development of 999 housing units (see Table 2-3 in Chapter 2, *Project Description).* Identified housing sites are shown in Figure ES-3 and are described in more detail in Section 2.6.1 of Chapter 2, *Project Description.*

The Housing Element in and of itself does not develop housing. It is a plan to provide for the possibility of housing, supported by consistent zoning standards. The Housing Element assumes that not all housing would realistically be built, based on previous development history in Pacific Grove,

as housing development is mainly accomplished by the private sector and depends upon factors the City does not control, including financial resources, market trends, and other factors. To provide the most conservative analysis, this DEIR assesses the highest range of development potential, meaning it assumes that all housing units accommodated in the Housing Element might be built during the 8-year planning period. This scenario assumes that future development occurs at a rate higher than it has historically in the city.

Additional Parcels for Environmental Analysis

To allow for flexibility and ensure a thorough environmental analysis, 15 additional parcel groups are analyzed in this DEIR (referred to herein as "additional parcels"), although actions related to these parcels are not proposed at this time, and may occur at a later date at the City's discretion. This approach is meant to accommodate potential future modifications to the Site Inventory to include some or all of the 15 additional parcels. The additional parcels are shown in Figure ES-3 and are described in more detail in Section 2.6.2 of Chapter 2, *Project Description.*

Zoning Amendments

When a local jurisdiction cannot demonstrate that sufficient vacant or underutilized sites exist with the appropriate zoning to adequately meet its RHNA, a "rezoning program" must be put into place. A rezoning program ensures that there are enough sites with sufficient densities to address the housing need identified through the RHNA. The project includes rezoning Sites 38 through 41 and Site 50 (Housing Sites) and increasing the maximum allowed development density (or "upzoning") of all parcels in the city zoned as Commercial-Downtown, Forest Hill Commercial, Light Commercial, and Heavy Commercial (Zoning Districts proposed for upzoning) that are outside the Coastal Zone to allow residential development to accommodate the RHNA. Further, the additional parcels would potentially be upzoned to allow for a greater housing unit development density.

The project would also include amending the City's Zoning Code to include objective design standards for multi-family residential and mixed-use development. Pursuant to Senate Bill 35, the Streamlined Affordable Housing Act (2016), local jurisdictions are required to approve qualified housing projects based on objective regulatory standards. The City of Pacific Grove will develop objective design standards for multi-family residential and mixed-use development. The project would include amending the City's Zoning Code to include these standards. The proposed objective design standards would include revisions to the maximum allowable height and site coverage allowance of several zoning districts, revisions to the minimum open space and yard size requirements of several zoning districts, and revisions to residential and commercial parking dimensions and parking requirements. The creation of objective design standards does not facilitate specific development projects; rather, the standards would apply to future multi-family residential and mixed-use development in Pacific Grove.

The project would include amending the City's Zoning Code to facilitate implementation of housing programs included in the 6th Cycle Housing Element that support the development of affordable housing, remove governmental constraints to the development of housing, and ensure the City's zoning and development standards are in compliance with state law. All proposed zoning changes are described in Section 2.6.3 of Chapter 2, *Project Description.*

General Plan Amendments

The proposed project includes amendments to the Land Use Element and the Health and Safety Element of the General Plan, which are necessary as a result of the preparation of the 6th Cycle Housing Element. These amendments are not comprehensive updates to the elements, but rather, are revisions specifically to ensure compatibility with the Housing Element Update, as well as revisions for compliance with state laws.

The Land Use Element, originally adopted as part of Pacific Grove's 1994 General Plan, serves as a long-term policy guide for managing land use and development throughout the city. It outlines the distribution, location, and intensity of various land uses, such as residential, commercial, institutional, recreational, and open space. The Land Use Element also addresses the permitted density and intensity of the various land use designations as reflected on the City's General Plan Land Use Map. To ensure alignment with recent zoning amendments and the updated Housing Element, the project would involve the following updates to the Land Use Element:

- Increase allowable densities in designated commercial areas, including Downtown, Central-Eardley, Forest Hill, Sunset Service, Visitor, Neighborhood, and Presidio-Austin Commercial zones.
- Update the Land Use Map to reclassify Sites 38–41 (Dennett, Sinex, and Grove Acre neighborhoods) and Site 50 to High Density Residential 29.0.
- Revise land use policies to support and implement the goals of the updated Housing Element.
- Update descriptive content and tables to reflect current land use patterns and area-specific characteristics.
- Modify the buildout analysis to incorporate the city's existing housing stock and reflect realistic development capacity.

Proposed revisions to the City's Land Use Element are shown in Appendix B. Amendments to the Land Use Element would not facilitate specific development projects; rather, the amendments would enable the implementation of and ensure consistency with and implementation of the Housing Element Update.

The Health and Safety Element, adopted as part of Pacific Grove's 1994 General Plan, identifies and evaluates key hazards that may impact the city, such as seismic activity, erosion, fire, flooding, and noise. It establishes policies and programs to reduce risks and enhance emergency response capabilities. In response to recent state legislation, including but not limited to Assembly Bill 747, Senate Bill 99, and Senate Bill 379, the City would update this element to incorporate new requirements related to emergency evacuation planning and climate change resilience. These updates aim to strengthen the City's preparedness and adaptability in the face of evolving environmental and public safety challenges. Proposed updates include:

- Revised background data and maps to reflect current hazard conditions.
- Identification of evacuation routes and capacity, as required by AB 747 and SB 99.
- Inclusion of a climate change vulnerability assessment, in compliance with SB 379.
- Updated policies addressing climate change, fire and flood hazards, and emergency preparedness and response.

Proposed revisions to the City's Health and Safety Element are shown in Appendix C. At the time of preparation of this DEIR, the proposed revisions to the Health and Safety Element have not yet been finalized. Final revisions are subject to review and approval by the California Board of Forestry and subsequent adoption by the City of Pacific Grove. This process is anticipated to be completed prior to certification and adoption of the Final EIR. Amendments to the Health and Safety Element would not facilitate specific development projects; rather, the amendments would include the assessment of evacuation routes and capacity and a climate change vulnerability assessment to comply with state law.

Growth Projections

The project in and of itself does not develop housing. It is a plan to provide for the possibility of housing, supported by consistent zoning standards. It is assumed that not all housing would realistically be built, based on previous development history in Pacific Grove, as housing development is mainly accomplished by the private sector and depends upon factors the City does not control, including financial resources, market trends, and other factors. However, for the purposes of this CEQA analysis, this program-level DEIR analyzes all the possible potential growth facilitated by the project.

As shown in Table ES-1, this DEIR will analyze a net increase of 2,335 new housing units and 292,578 commercial square feet.[1] As described in Section 2.6.1, *Housing Element Update,* the Site Inventory represents a "realistic" buildout, primarily assuming site residential buildout of up to 70 percent of the maximum allowable density, except where specific conditions exist. In contrast, the growth projections provided in Table ES-1 and analyzed throughout this DEIR assume a residential buildout of up to 100 percent of the maximum density. Growth projections analyzed in this DEIR reflect varying levels of commercial buildout based on recent market and redevelopment trends in the city and region. This approach allows for a more conservative and comprehensive analysis. As such, the DEIR will use these figures to calculate and determine potential environmental impacts. In addition, because the DEIR assumes a residential buildout of up to 100 percent of the maximum density, the DEIR evaluates additional housing units facilitated by Housing Element programs beyond those needed to meet the RHNA, including units facilitated by Program 10, Enhanced Housing Mobility Options. Program 10 has an objective to facilitate the development of 50 additional residential units not included in units needed to meet the RHNA. While the exact quantity and location of units facilitated by Program 10 are not currently known, the development of additional housing units is analyzed in this DEIR because of the conservative maximum buildout assumptions.

[1] The proposed upzoning described in Section 2.6.3 would increase residential density allowable on all C-D, C-FH, C-1, C-2, I, or R-2-B-3 zoned parcels; allowable commercial density would not increase. However, these parcels are not fully built out under current conditions, meaning additional commercial development could occur. Should these sites be redeveloped, it is possible that commercial square footage could also increase up to the maximum currently allowed. As such, to provide a comprehensive and conservative analysis, the EIR assumes full buildout that could occur on these parcels.

Table ES-1 Growth Potential Analyzed in the DEIR

Characteristic	Existing[1]	Anticipated Buildout Facilitated by the Project[2]	Net Increase (Project Minus Existing)[3]
Housing Units	160 units	2,495 units	2,335 units
Commercial Area	988,673 square feet	1,281,251 square feet	292,578 square feet
Population	14,966 people	19,916 people[4]	4,950 people[4]

[1] Summary of baseline conditions, including the number of housing units and commercial square footage currently within the housing sites and upzoning areas, and Pacific Grove's current (2024) population.

[2] The anticipated increase in residential and commercial development that could be facilitated by the rezoning and upzoning under the proposed project. Refer to Appendix D for specific buildout assumptions.

[3] The net increase in residential development that could be facilitated by the rezoning and upzoning and net increase in commercial development that could be facilitated by redevelopment (gross increase minus existing housing units and commercial area).

[4] Population was calculated using an average of 2.12 persons per household (California Department of Finance 2024).

Note: These growth projections were determined by calculating the existing housing units and commercial area within the housing sites and upzoning areas, and multiplying the housing sites' and upzoning areas' parcel area by the allowable density in its Zoning District. These growth projections do not match the growth projections in the Site Inventory, which assume a smaller development yield. The intent of this greater growth projection for the purposes of this DEIR analysis is to ensure a conservative and comprehensive analysis is provided.

Source: Rincon Consultants 2024

Project Objectives

- Provide capacity to meet the state-required Regional Housing Needs Allocation (RHNA) for the 6th Cycle Housing Element planning period of 2023-2031, including providing a buffer of 20 percent of the remaining RHNA for lower-[2] and moderate-income units to ensure no net loss.
- Ensure that the growth facilitated by the Housing Element is achievable, through associated amendments to the Zoning Code and/or Land Use Element of the General Plan.
- Disperse housing sites throughout the City to ensure that no single neighborhood or area is overburdened or impacted.
- Preserve historic, single-family neighborhoods.
- Improve fair housing conditions in the city by implementing meaningful actions. Provide for fair and equal housing opportunities for all persons, regardless of protected characteristics, including but not limited to, age, ancestry, sex, gender, gender expression, sexual orientation, religion, disability, family status, race, creed, color, or national origin.
- Continue existing and develop new programs and policies to meet the projected affordable housing need of extremely low, very low, low, and moderate-income households.
- Bring the General Plan into conformance with recently enacted state housing law, including Assembly Bill (AB) 1398, AB 747, Senate Bill (SB) 99, and SB 379; as well as update the City's Health and Safety Element to meet state requirements for general plan safety elements.
- Identify housing policies and programs that enable the development of additional units and the preservation of existing units, that reduce governmental constraints to building housing, and that affirmatively further fair housing.
- Encourage the development of by-right low-income housing for 6th Cycle housing sites proposed for rezoning and existing 4th and 5th Cycle housing sites that are reused in the 6th Cycle, increasing the overall availability of affordable housing.

[2] "Lower-income" includes both the very low and low income categories.

- Identify appropriate housing sites and provide housing development opportunities in specified areas with the potential to accommodate additional housing or are proximate to jobs, transportation, shopping and schools, and the accompanying zoning required to accommodate housing development.

Alternatives

As required by the California Environmental Quality Act (CEQA), this DEIR examines alternatives to the proposed project. Studied alternatives include the following three alternatives. Based on the alternatives analysis, Alternative 3 was determined to be the environmentally superior alternative.

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Density Alternative
- Alternative 3: Fewer Sites

Alternative 1 (No Project) assumes that the Housing Element Update, zoning amendments, and General Plan amendments are not adopted or implemented, and that there is no change in zoning or density for the housing sites, upzoning areas, and additional parcels identified by the project. Current uses on the sites would continue under this alternative, with future full buildout in these sites limited by existing housing policies, zoning, and allowable density. Buildout of the housing sites, upzoning areas, and additional parcels under existing zoning would allow for up to 356 total housing units and a population increase of approximately 293 people. This alternative would not accomplish most of the project objectives, but would meet the project objectives to preserve historic, single-family neighborhoods and to continue existing programs and policies related to affordable housing needs.

Alternative 2 (Reduced Density) assumes the adoption and implementation of the Housing Element Update, zoning amendments, and General Plan amendments, with provisions for reduced densities across all proposed housing sites, upzoning areas, and additional parcels. Alternative 2 would maintain the same number and location of housing sites as the proposed project yet would involve reduced density at each site to ensure the development of only the minimum number of housing units required to meet the RHNA and for the Housing Element Update to be approved by the California Department of Housing and Community Development (HCD). Alternative 2 would facilitate the development of 941 units, the minimum number of housing units required to meet the RHNA and meet HCD's requirements for the Housing Element Update. Unlike the proposed project, this alternative does not assume full buildout at maximum density for each housing site; instead, it envisions development at various, lower densities.

Alternative 3 (Fewer Sites) assumes that the Housing Element Update, zoning amendments, and General Plan amendments are adopted and implemented, but that the Housing Element Update would include fewer housing sites than the proposed project. Under this alternative, housing units would be concentrated in fewer overall housing sites, and housing sites kept in the inventory would be located in more densely-developed commercial areas (such as the Downtown District, Central-Eardley Commercial District, Forest Hill Commercial District, and the Dennett and Sinex District). Other more dispersed or currently undeveloped sites, except for those that can accommodate low-income housing, would be eliminated from the site inventory under this alternative. Overall, Alternative 3 would include 22 housing sites, thereby eliminating 51 sites from the inventory. Alternative 3 includes the minimum number of sites needed to ensure the development of only the

minimum number of housing units (941) required to meet the RHNA and for the Housing Element Update to be approved by HCD.

Refer to Chapter 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

In accordance with Section 15123(b)(2) of the *CEQA Guidelines*, this section identifies areas of known controversy associated with the proposed project, as raised during the environmental scoping process. Comments submitted in response to the Notice of Preparation and during the EIR Scoping Meeting identified the following areas of concern:

- Potential impacts to biological resources, including special-status species and sensitive habitats
- Effects on tribal cultural resources and the need for consultation under AB 52 and SB 18
- Water supply availability and infrastructure capacity
- Transportation and circulation impacts, including traffic congestion and parking demand
- Aesthetic and visual impacts, particularly in historic districts
- Noise impacts from construction and increased development
- Wildfire risk and emergency evacuation concerns
- Consistency with existing land use plans and policies
- Greenhouse gas emissions and climate adaptation
- Public services and utilities, including schools, recreation, and solid waste

Responses to the Notice of Preparation of a Draft EIR are summarized in Chapter 1, *Introduction*.

Issues to be Resolved

The proposed project would require City Council approval of the Housing Element Update and associated amendments to the General Plan and Zoning Code. Additional actions include Planning Commission recommendations on rezoning, upzoning, and development standard amendments, as well as environmental review certification of the Final EIR.

Issues Not Studied in Detail in the EIR

Section 4.18, *Effects Found Not to Be Significant,* summarizes issues from the environmental checklist that were determined to have no significant impacts. As indicated in Section 4.18, there is no substantial evidence that significant impacts would occur related to agricultural resources and mineral resources.

Summary of Impacts and Mitigation Measures

Table ES-2 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved pursuant to Section 15093 of the *CEQA Guidelines*.

- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section §15091 of the *CEQA Guidelines.*
- **Less than Significant.** An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure(s)	Residual Impact
Aesthetics		
Impact AES-1. Implementation of the proposed project would facilitate the development of new structures that could affect scenic vistas in the project area. However, compliance with the policies in the proposed objective design standards and the Pacific Grove General Plan, LCP, and Municipal Code would ensure the protection of scenic vistas. Therefore, impacts would be less than significant.	None required.	Less than significant impact.
Impact AES-2. Development facilitated by the proposed project could result in the loss of scenic mature trees in Pacific Grove and could involve demolition or alteration of historic buildings with scenic value along SR-68. Compliance with the proposed objective design standards, and the policies the Pacific Grove General Plan, LCP, and Municipal Code would ensure the protection of scenic resources along SR-68. Therefore, impacts would be less than significant.	None required.	Less than significant impact.
Impact AES-3. Implementation of the proposed project would facilitate housing development and would change development standards including residential density, building heights, allowed uses, and parking requirements. However, visual character and scenic quality would be protected through adherence to City design guidelines and implementation of goals and policies in the City's General Plan, LCP, and Municipal Code that address visual character and quality of public views. Impacts would be less than significant.	None required.	Less than significant impact.
Impact AES-4. Development facilitated by the project could create new sources of light and glare; however, the City's Municipal Code regulates lighting and glare throughout the city. Therefore, potential impacts on daytime or nighttime views resulting from the introduction of new light or glare sources would be less than significant.	None required.	Less than significant impact.

Impact	Mitigation Measure(s)	Residual Impact
Air Quality		
Impact AQ-1. Projected growth under the proposed project would exceed growth forecasts used to develop the MBARD AQMP. However, future growth forecasts would be updated to reflect the Housing Element Update, and the General Plan includes policies to reduce emissions associated with development. In addition, proposed project buildout would reduce regional VMT. Therefore, the project would not conflict with or obstruct implementation of the AQMP and impacts would be less than significant.	None required.	Less than significant impact.
Impact AQ-2. Development facilitated by the proposed project would generate short-term and long-term emissions of criteria pollutants. However, construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the MBARD region is in nonattainment. Additionally, the rate of increase in VMT would not exceed the rate of population growth under the proposed project. Therefore, impacts related to both construction and operation would be less than significant.	None required.	Less than significant impact.
Impact AQ-3. Development facilitated by the proposed project would not increase carbon monoxide concentrations such that it would create carbon monoxide hotspots. While the project is not considered a land use that would generate substantial toxic air contaminants emissions, emissions within 1,000 feet of a sensitive receptor could expose sensitive receptors to substantial pollutant concentrations. With the implementation of Mitigation Measures AQ-3(a) and AQ-3(b), construction impacts on sensitive receptors would be less than significant with mitigation incorporated.	**AQ-3(a) Construction Emissions Reductions**. Prior to construction activity and issuance of grading permits for development facilitated by the project, the City Building Official shall confirm that the grading plan, building plans, and specifications stipulate the following measures shall be implemented: ▪ All mobile off-road equipment (wheeled or tracked) used during construction activities shall meet USEPA Tier 4 Final standards. Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards. ▪ Alternative fuel (natural gas, propane, electric, etc.) construction equipment shall be incorporated where available or necessary to reduce TAC emissions. These requirements shall be incorporated into the contract agreement with the construction contractor. A copy of the equipment's certification or model year specifications shall be available upon request for all equipment on-site. ▪ Electricity shall be supplied to the site from the existing power grid to support the electric construction equipment. If connection to the grid is determined to be infeasible for portions of the project, a non-diesel fueled generator shall be used.	Less than significant impact.

Impact	Mitigation Measure(s)	Residual Impact
	AQ-3(b) MBARD Fugitive Dust Reduction Measures. The City shall require the implementation of the following MBARD fugitive dust reduction measures, where applicable, to reduce PM_{10} emissions generated by dust during the construction phase of development facilitated by the project: ▪ Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure. ▪ Prohibit all grading activities during periods of high wind (over 15 mph). ▪ Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days). ▪ Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area. ▪ Haul trucks shall maintain at least 2'0" of freeboard. ▪ Cover all trucks hauling dirt, sand, or loose materials. ▪ Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land. ▪ Plant vegetative ground cover in disturbed areas as soon as possible. ▪ Cover inactive storage piles. ▪ Install wheel washers at the entrance to construction sites for all exiting trucks. ▪ Pave all roads on construction sites. ▪ Sweep streets if visible soil material is carried out from the construction site. ▪ Post a publicly visible sign which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the Monterey Bay Unified Air Pollution Control District shall be visible to ensure compliance with Rule 402 (Nuisance). ▪ Limit the area under construction at any one time.	
Impact AQ-4. Implementation of the proposed project would not create objectionable odors that would impact a substantial number of people. Impacts related to odors would be less than significant.	None required.	Less than significant impact.

Impact	Mitigation Measure(s)	Residual Impact
Biological Resources		
Impact BIO-1. Development facilitated by the project could disturb known special-status species or their associated habitat, including through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Development facilitated by the project during the nesting bird season could directly and/or indirectly affect nesting birds protected under the MBTA and CFGC Section 3503. Impacts would be less than significant with mitigation incorporated.	**BIO-1(a) Special-Status Plant Species Surveys**. A City-approved biologist shall complete surveys for special-status plants in undeveloped areas at Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4 prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species. All plant surveys shall be conducted by a City-approved biologist during the blooming season, and during development application processing yet prior to development permit approval. All special-status plant species identified on each site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the City, and the CDFW and/or USFWS for state or federally listed plants, as appropriate, for review and/or approval. If project construction does not occur within three years of the initial special-status plant survey, additional floristic surveys shall be repeated. If special-status plants are not found during special-status plant surveys, no further action is required. If federally- and/or state-listed individuals and/or CRPR 1B or 2 plant populations are found during special-status plant surveys, the Mitigation Measures BIO-1(b) and BIO-1(c) shall be implemented. **BIO-1(b) Special-Status Plant Species Avoidance, Minimization, and Mitigation**. If federally-listed and/or state-listed individuals, and/or CRPR 1B or 2 plant populations are found during special-status plant surveys [pursuant to Mitigation Measure BIO-1(a)], and would be directly impacted by development, then the project shall be re-designed to avoid impacting listed plant species or CRPR 1B or 2 populations, where feasible and compatible with project design. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a City-approved biologist based on species location in relation to the construction area and level of disturbance from construction activities, to protect them from harm. Prior to initiation of construction activities the project proponent shall submit a site plan depicting the location(s) of special-status plants and avoidance buffers to the City for review and verification. The City-approved biologist(s) shall possess a degree in biology, ecology, botany, or a related field, and have demonstrated knowledge and experience with native	Less than significant impact.

Impact	Mitigation Measure(s)	Residual Impact
	plant and wildlife species of the region, their habitats, and applicable environmental regulations. The biologist shall have prior experience conducting pre-construction surveys, construction monitoring, and implementing mitigation measures and permit conditions similar to those required for this project. If special-status plants can be avoided, no further action is required. If federally- and/or state-listed individuals and/or CRPR 1B or 2 plant populations cannot be avoided, then Mitigation Measure BIO-1(c) shall be implemented. **BIO-1(c) Habitat Mitigation and Monitoring Plan**. If federally- and/or state-listed plants, non-listed special-status plant populations, sensitive natural communities, or waters of the US and/or State cannot be avoided and will be impacted by development, all impacts shall be mitigated by the implementing entity at a minimum ratio of 1:1 for occupied habitat area as a component of habitat restoration or through compensatory mitigation. A habitat mitigation and monitoring plan (HMMP) shall be prepared by a City-approved biologist and submitted by the project proponent to the City for review and verification prior to the issuance of building permits. The project proponent shall also obtain all necessary permits from USFWS and/or CDFW and provide proof of take authorization, if required, to the City for verification prior to issuance of any permits for ground disturbing activities. The HMMP shall include, at a minimum, the following components: 1. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type). 2. Goal(s) of the compensatory mitigation project (type[s] and area[s]) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type[s] to be established, restored, enhanced, and/or preserved). 3. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions, and values). 4. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan). 5. Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule).	

Impact	Mitigation Measure(s)	Residual Impact
	6. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports). 7. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type or other industry standards as determined by a qualified restoration specialist. 8. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria. 9. Notification of completion of compensatory mitigation and agency confirmation. 10. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism). 11. All nursery plants used in restoration shall be inspected for sudden oak death. Within 30 days of completion of monitoring, a final monitoring report shall be submitted to the City for review and verification, documenting compliance with the HMMP and achievement of success criteria. **BIO-1(d) Worker Environmental Awareness Program**. Prior to initiation of construction activities at Site 49, 42, 43, 47, 50, 55, and additional parcels A1, A3, and A4 (including staging and mobilization), the project proponent for development shall arrange for all personnel associated with project construction for the applicable phase to attend Worker Environmental Awareness Program (WEAP) training, conducted by a City-approved biologist, to aid workers in recognizing special-status biological resources that may occur in the construction area. The specifics of this WEAP shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction. All employees shall sign a form provided by the trainer indicating they have attended the WEAP training and understand the information presented to them. The form shall be submitted to the City to document compliance prior to the initiation of ground disturbing activities, and as new personnel are added to the construction site.	

Impact	Mitigation Measure(s)	Residual Impact
	BIO-1(e) Northern California Legless Lizard Avoidance and Minimization. A pre-construction clearance survey shall be conducted in undeveloped areas of Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4 for Northern California legless lizard by a City-approved biologist within 48 hours prior to the start of construction (including staging and mobilization). The survey shall cover the entire disturbance footprint within suitable habitats with moist loose soil, plus a minimum 100-foot buffer, where permissible, and should identify all special-status wildlife species observed on the project site. During the pre-construction survey the biologist shall inspect under logs, leaf litter, or other suitable refuge. If Northern California legless lizards are identified, individuals shall be relocated by a biologist to suitable cover with loose soils a minimum of 500 feet from the project site, as accessible. A written report demonstrating compliance with the pre-construction clearance survey requirement, including a description of all individuals identified and relocated during the survey, shall be submitted to the City for review and verification prior to the start of construction. **BIO-1(f) Pre-Construction Bat Surveys and Maternity Roost Avoidance.** Prior to project activities at Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4, a qualified, City-approved bat specialist shall conduct a habitat assessment to determine if bat roosting habitat occurs in or near the project area. Bat specialists shall be knowledgeable in bat ecology and identification, and shall have demonstrated experience conducting pre-construction surveys, monitoring construction activities, and implementing mitigation measures for bats on projects similar in scope and setting. If it is determined that the project area may contain or occur within 100 feet of potential day roosting habitat or 300 feet of potential maternity roosting habitat, a qualified bat specialist shall conduct a focused bat emergence survey within these areas at least 30 days prior to construction or vegetation removal (plus a 100-foot buffer as access allows). The survey shall be conducted at least 1 hour before sunset and up to 3 hours after sunset, at a minimum. Acoustic recognition technology (such as SonoBat software or similar technology) shall be used during the survey to maximize detection of bats. The qualified bat specialist shall identify and demarcate habitat (i.e., trees or structures) containing daytime and/or nighttime roosts, and any maternity roosts. Survey results, including negative findings, shall be provided to the City within 30 days of completion of the survey. Depending on the survey results, a qualified bat specialist shall identify potentially significant effects of the project on bats and determine which measures below are necessary to reduce impacts to a less-than-significant level.	

Impact	Mitigation Measure(s)	Residual Impact
	A report of the survey results and proposed minimization measures shall be submitted to the City for review and verification. Measures to avoid and minimize impacts to bats may include the following: ▪ If maternity roosts are observed, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are ready to fly out of the roost (March 1 to September 30). If tree removal is required during the maternity roosting season, trees potentially supporting an active maternity roost shall be closely inspected by a qualified bat specialist to determine the presence or absence of roosting bats. Inspection of each tree shall occur no more than 7 days prior to tree disturbance, and inspection results, including negative findings, shall be provided to the City within 7 days of completion of the inspection. Trees determined to be supporting maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 300 feet of or directly under or adjacent to an active maternity roost, and the non-disturbance buffer shall only be reduced at the discretion of a qualified bat specialist based on species location in relation to the construction area and level of disturbance from construction activities. The minimum buffer shall not be less than 50 feet. Work shall not occur between 30 minutes before sunset and 30 minutes after sunrise. ▪ If the removal of a tree containing potential roosting habitat for leaf dwelling bat species is required, the tree shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may be present, the tree shall be gently nudged two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a qualified bat specialist. If it is determined that the removed tree contains a bat roost, the tree shall not be immediately bucked or mulched. A period of at least 24 to 48 hours shall elapse prior to such operations to allow bats to escape. ▪ If the removal of a tree containing potential roosting habitat for trunk or crevice dwelling bat species is required, the tree shall be removed under the direction of a City-approved bat specialist using a two-step tree removal process conducted over two consecutive days. On the first day, the tree's non-habitat branches shall be trimmed using handheld equipment only (no heavy machinery), such as chainsaws. The noise and vibration disturbance, together with the visible alteration of the tree, is effective in causing bats that	

Impact	Mitigation Measure(s)	Residual Impact
	emerge nightly to feed to not return to the roost. The remainder of the tree shall be removed on the second day. ▪ If the alteration or removal of structures (i.e., buildings) containing potential roosting habitat for bats is required, a qualified bat specialist shall conduct a survey of all structures no more than 14 days prior to demolition. If no signs of bat roosting activity are observed, no further actions shall be required. If bats or signs of bat roosting activity are observed, a City-approved bat specialist shall prepare specific recommendations for and the project proponent shall implement the recommended methods of humane eviction such as partial dismantling to allow bats to abandon the roost, or installation of one-way doors. Removal of structures containing potential roosting habitat shall be monitored for compliance with the recommended methods and success of eviction by a City-approved bat specialist. If bats are not successfully evicted, the bat specialist shall stop work, reassess exclusion methods, and demolition may not continue until bats have been successfully evicted. ▪ If a roost is observed being used by many bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed shall depend on the size of the hibernaculum and shall be determined through consultation with CDFW. ▪ A monitoring report shall be submitted to the City within seven days of activities requiring potential roost removal. The report shall include a summary of dates of monitoring, methods used, findings (including species observed, if known, and roost activity), and confirmation of compliance with applicable avoidance and minimization measures. **BIO-1(g) Monarch Butterfly Avoidance and Minimization**. Project construction activities at Sites 42 and 43, including equipment staging, grading, and construction, shall be avoided during the monarch butterfly overwintering season between October 15 through March 15, if practicable. In the event project construction activities cannot be avoided during the overwintering season, the project proponent shall retain a City-approved biologist to conduct a survey for roosting monarch butterflies within seven days prior to initiation of construction activities to determine their presence/absence. If no monarch butterflies are observed during pre-construction surveys, no further actions are necessary. In the event construction pauses for a period of 7 days or more, if construction is planned to restart during the monarch butterfly overwintering season (October 15 through March 15), the project proponent	

Impact	Mitigation Measure(s)	Residual Impact
	shall retain a City-approved biologist to conduct a new survey in accordance with the requirements of this mitigation measure. If construction activities occur during the overwintering season and monarch butterflies are present, the City-approved biologist shall establish a protective buffer, ranging from 100 to 300 feet from the roosting site in which monarch butterflies are aggregating based on species location in relation to the construction area and level of disturbance from construction activities. The buffer shall be delineated on site by the biologist with flagging or staking visible by construction personnel. The construction contractor shall ensure no construction occurs within the protective buffer, including staging of equipment or stopping or idling in the buffer, during the overwintering season. In the event construction activities, or other use of equipment, is needed to work within the buffer, the City-approved biologist shall be present on site to monitor construction activities and determine if the work is disturbing the aggregated butterflies (e.g., aggregations begin to disperse in response to noise or vibration from construction). If the biologist determines the work is disturbing the butterflies at any time, the biologist shall stop work within the protective buffer. The biologist shall have the authority to direct construction activities and can reinitiate construction activities when the butterflies no longer show signs of being disturbed. In addition, due to the regular movement of the butterflies and locations of the aggregations, the biologist shall have the discretion to adjust the protective buffers within the 100- to 300-foot required buffer range, as necessary, based on species location in relation to the construction area and level of disturbance from construction activities. **BIO-1(h) Nesting Bird Avoidance**. Ground disturbance and vegetation removal activities shall be restricted to the non-breeding season for birds (September 16 to January 31), when feasible. For ground disturbance and vegetation-removal activities occurring during the bird nesting season (February 1 to September 15), general pre-construction nesting bird surveys shall be conducted by a City-approved biologist not more than seven days prior to construction activities involving ground clearing, vegetation removal/trimming, or building demolition. The surveys shall include the disturbance area plus a 200-foot buffer around the site, where feasible, and a 500-foot buffer for raptors. If active nests are located, an appropriate avoidance buffer shall be established within which no work activity would be allowed that would impact these nests. The avoidance buffer shall be established by the City-approved biologist on a case-by-case basis based on the species and site conditions. In no case shall the buffer be smaller than 50	

Impact	Mitigation Measure(s)	Residual Impact
	feet for non-raptor bird species, or 200 feet for raptor species. Larger buffers may be required depending on the status of the nest and the construction activities occurring near the nest. The buffer area(s) shall be closed to all construction personnel and equipment until juveniles have fledged and until the nest is inactive. A City-approved biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. If there are delays in on-site activities for more than 14 days during the breeding season, an additional survey shall be required prior to the start of work. A report of the survey results and any proposed avoidance buffers shall be submitted to the City for review and verification prior to the initiation of construction activities. **BIO-1(i) Invasive Weed Prevention**. For individual development projects where activity would occur in undeveloped areas at Sites 47, 49, 50, and 55, and additional parcels A3 and A4, landscape plans approved by the City Community Development Department as part of a development permit applications shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High Risk Lists. During construction the project proponent shall: ▪ Limit site access and parking, equipment storage and stationary construction activities to the designated staging areas to the maximum extent feasible. ▪ Prior to staging equipment on-site, clean all equipment caked with mud, soils, or debris from off-site sources or previous project sites to avoid introducing or spreading invasive exotic plant species. When feasible, remove invasive exotic plants from the individual project site. All equipment used on the premises should be cleaned prior to leaving the site for other projects. ▪ All disturbed areas requiring hydroseeded stabilization shall utilize a mix of locally native species, as feasible, upon completion of work in those areas. ▪ In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased. ▪ If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a City-approved biologist and the City. Within 30 days of project completion, a report shall be submitted to the City for review and verification documenting compliance with the invasive weed prevention measures above.	

Impact	Mitigation Measure(s)	Residual Impact
Impact BIO-2. Development facilitated by the project could have a substantial adverse effect on a sensitive natural communities and riparian Habitat identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. Impacts would be less than significant with mitigation incorporated.	**BIO-1(a) Special-Status Plant Species Surveys.** Refer to Impact BIO-1, above. **BIO-1(b) Special-Status Plant Species Avoidance, Minimization, and Mitigation**. Refer to Impact BIO, above. **BIO-1(c) Habitat Mitigation and Monitoring Plan.** Refer to Impact BIO-1, above. **BIO-1(i) Invasive Weed Prevention.** Refer to Impact BIO-1, above.	Less than significant impact.
Impact BIO-3. Development facilitated by the project could have a substantial adverse effect on state- or federally-protected wetlands. Impacts would be less than significant with mitigation incorporated.	**BIO-1(c) Habitat Mitigation and Monitoring Plan.** Refer to Impact BIO-1, above. **BIO-3(a) Jurisdictional Delineation**. Prior to issuance of grading permits, a City-approved biologist shall complete a jurisdictional delineation of wetland features at Site 49 and additional parcels A3 and A4. The jurisdictional delineation shall determine the extent of the jurisdiction for CDFW, USACE, and/or RWQCB, and shall be conducted in accordance with the requirements set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the city. The delineation shall be used to inform design development in a manner that avoids impacts to jurisdictional waters to the maximum extent practicable. If jurisdictional waters are identified within 100 feet of proposed limits of work, Mitigation Measure BIO-3(b) shall be required. If jurisdictional waters are identified within proposed limits of work and cannot be avoided, Mitigation Measure BIO-1(c) shall be required. The project proponent shall also be required to apply for and obtain applicable federal and State permits for impacting jurisdictional waters, and shall implement all conditions of such permit(s). **BIO-3(b) Waters and Wetlands Impact Avoidance and Minimization**. To avoid and/or minimize potential indirect impacts to jurisdictional waters and water quality, the City shall require following BMPs to be implemented by the project proponent during construction within 100 feet of jurisdictional areas at Site 49 and additional parcels A3 and A4: ▪ Any material/spoils generated from project activities shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate. ▪ All vehicles and equipment shall be in good working condition and free of leaks. The contractor shall prevent oil, petroleum products, or any other pollutants from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.	Less than significant impact.

Impact	Mitigation Measure(s)	Residual Impact
	▪ All re-fueling, cleaning, and maintenance of equipment shall occur at least 100 feet from jurisdictional areas. ▪ Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. ▪ Prevent the discharge of silt or pollutants off the site when working adjacent to jurisdictional areas. Install BMPs (i.e., silt barriers, sand bags, straw bales) as appropriate. ▪ Any spillage of material shall be stopped if it can be done safely. The contaminated area shall be cleaned and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative shall be notified. ▪ Work during times of precipitation shall be avoided to the maximum extent possible. Within 30 days of completion, a report shall be submitted to the City for review and verification, documenting compliance with the above measures and the National Pollutant Discharge Elimination System Permit.	
Impact BIO-4. Development facilitated by the project would not substantially impede wildlife movement areas or native wildlife nursery sites. Impacts would be less than significant.	None required.	Less than significant impact.
Impact BIO-5. Development facilitated by the project would be subject to the City's policies and requirements protecting biological resources, including ESHAs and protected trees. Impacts would be less than significant with mitigation incorporated.	**BIO-1(i) Invasive Weed Prevention.** Refer to Impact BIO-1, above.	Less than significant impact.
Impact BIO-6. Development facilitated by the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There would be no impact.	None required.	No impact.
Cultural Resources		
Impact CUL-1. Development facilitated by the project has the potential to cause adverse changes to the significance of historical resources. Impacts would be significant and unavoidable.	No feasible mitigation measures available.	Significant and unavoidable impact.

Impact	Mitigation Measure(s)	Residual Impact
Impact CUL-2. Ground-disturbing activities associated with development facilitated by the project could result in disturbance or damage to archaeological resources. This impact would be less than significant with mitigation incorporated.	**CUL-2(a) Archaeological Resources Assessment and Protection.** For specific development projects involving ground disturbance on identified housing sites, in upzoning areas, or on additional parcels, the project proponent shall retain a City-approved consultant to conduct a preliminary review to determine the need for a formal archaeological assessment. The preliminary review shall include a review of available information regarding previous disturbance, the presence of fill, and previous cultural resources studies on file with the City. If it can be determined that all proposed ground disturbance will occur in documented non-native fill or that the project site has been previously disturbed and subject to cultural resources review with negative findings, no further review will be required. If preliminary review suggests the project may impact native soils that have not been previously subject to cultural resources study, the project proponent shall retain a City-approved archaeologist to prepare an archaeological resources assessment. The archaeological assessment shall be conducted by a qualified archaeologist who meets the Secretary of the Interior's PQS in prehistoric or historic archaeology (NPS 2025). Archaeological assessments shall include a records search at the Northwest Information Center, pedestrian survey of the individual development site, and preparation of a technical report to be submitted to the City for review and approval. The archaeological assessment shall include recommendations for additional study or mitigation, if necessary, which may include, but would not be limited to: subsurface testing, designing and implementing a worker environmental awareness program, construction monitoring by a qualified archaeologist, avoidance of sites, or preservation in place. Recommended mitigation measures shall be consistent with *CEQA Guidelines* Section 15126.4(b)(3). **CUL-2(b) Inadvertent Discovery of Archaeological Resources.** If evidence of any prehistoric or historic-era subsurface archaeological features or deposits are discovered during construction-related earthmoving activities (e.g., ceramics, trash scatters, lithic scatters), all ground-disturbing activity within a minimum of 50 feet shall be halted until a qualified archaeologist can assess the significance of the find. The work exclusion area may be reduced or expanded as directed by the qualified archaeologist. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the archaeologist determines that further information is needed to evaluate significance, a testing plan shall be prepared and implemented. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique	Less than significant impact.

Impact	Mitigation Measure(s)	Residual Impact
	archaeological resource), the archaeologist shall work with the City to avoid disturbance to the resources. If complete avoidance is not feasible in light of project design, economics, logistics, and/or other factors, the archaeologist shall recommend additional measures such as the preparation and implementation of a data recovery plan. All cultural resources work shall follow accepted professional standards in recording any find including submittal of standard Department of Parks and Recreation Primary Record forms and location information to the Northwest Information Center. If the find is a prehistoric archaeological site, the culturally affiliated California Native American tribe shall be notified and afforded the opportunity to monitor mitigative treatment. During evaluation or mitigative treatment, ground disturbance and construction work may continue in other parts of the project area that are distant enough from the find not to impact it, as determined appropriate by the qualified archaeologist.	
Impact CUL-3. Ground-disturbing activities associated with development facilitated by the project could result in disturbance of human remains. Compliance with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8 would ensure the impacts to human remains would be less than significant.	None required.	Less than significant.
Energy		
Impact E-1. Project construction and operation would require temporary and long-term consumption of energy resources. However, with adherence to state and local regulations, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be less than significant.	None required.	Less than significant.
Impact E-2. The energy efficiency goals, policies, and strategies contained in the Pacific Grove General Plan and the AMBAG 2045 MTP/SCS. Construction and operation of future development facilitated by the project would comply with relevant provisions of the state's CALGreen and Title 24 of the California Energy Code. Impacts would be less than significant.	None required.	Less than significant.

Impact	Mitigation Measure(s)	Residual Impact
Geology and Soils		
Impact GEO-1. The project would not 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. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-2. The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-3. The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-4. The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-5. The project would not result in substantial soil erosion or the loss of topsoil. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-6. The project would not 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. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-7. The project would not facilitate development in areas located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. impacts would be less than significant.	None required.	Less than significant.
Impact GEO-8. Development facilitated by the project would connect to municipal wastewater services and would not rely on septic systems or on-site alternative wastewater disposal systems. There would be no impact.	None required.	No impact.

Impact	Mitigation Measure(s)	Residual Impact
Impact GEO-9. Development facilitated by the proposed plan has the potential to impact paleontological resources. Impacts would be less than significant with mitigation incorporated.	**GEO-9 Paleontological Resources Analysis**. The City of Pacific Grove shall require the following specific requirements for projects that could disturb geologic units with high paleontological sensitivity (i.e., Quaternary alluvial fan deposits or Quaternary marine terrace deposits), including Sites 3, 6, 7, 10-19, 20-22, 24-28, 30-37, 42-46, 51, 52, 57, A2, A7, A9, and A11: 1. Prior to initial ground disturbance, the project applicant shall retain a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP 2010), to conduct a paleontological resources assessment (PRA), which may be part of a future project-specific environmental review document or a stand-alone report. The PRA shall determine the potential for the project to impact paleontologically sensitive sediments and the paleontological resources that may be contained therein. The PRA shall be reviewed by the City to ensure the project's compliance with this mitigation measure, SVP Guidelines, and MGMC Chapter 23.76. 2. If the PRA identifies no potential impacts to paleontological resources, then no further paleontological mitigation would be required. If the project could have a significant impact on paleontological resources, the PRA shall outline mitigation measures to reduce impacts by ensuring that all scientifically significant paleontological resources potentially encountered during construction are collected and preserved in a paleontological repository meeting SVP (2010) standards. These measures would be overseen by a Qualified Professional Paleontologist and may include, but would not be limited to: training of construction personnel, paleontological monitoring, and procedures for an unanticipated paleontological resource discovery. If construction personnel training is required, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel. Paleontological monitoring would be required for excavations, grading, trenching, or boring/drilling greater than 2 feet in diameter that occurs within previously undisturbed sediments with high paleontological sensitivity. Paleontological monitoring shall be conducted by an individual meeting the SVP (2010) definition of a Paleontological Resources Monitor. The Qualified Professional Paleontologist may recommend that monitoring be reduced in frequency or ceased entirely based on geologic observations. Such decisions shall	Less than significant.

Impact	Mitigation Measure(s)	Residual Impact
	be subject to review and approval by the City. Upon completion of ground-disturbing activities (or laboratory preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts. The report shall include a summary of the field and laboratory methods employed; an overview of project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City and, if fossil curation occurred, the designated scientific institution. In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease, and the Qualified Professional Paleontologist shall evaluate the find. If the fossil(s) is (are) not scientifically significant, then construction activity may resume. If it is determined that the fossil(s) is (are) scientifically significant, then they shall be salvaged, prepared to a curation-ready condition, and curated in a paleontological repository per SVP (2010) standards.	
Greenhouse Gas Emissions		
Impact GHG-1. Construction and operation of the proposed project would generate GHG emissions, and the project would incorporate features that align with the goals of the applicable plans, policies, and regulations related to the reduction of GHG emissions. However, even with the implementation of Mitigation Measure GHG-1, individual projects could face challenges that hinder their ability to implement Mitigation Measure GHG-1 and thus not be consistent with the 2022 Scoping Plan. Therefore, impacts would be significant and unavoidable.	**GHG-1 Greenhouse Gas Emissions Reductions.** Development facilitated by the proposed project shall incorporate GHG emissions reduction actions to demonstrate consistency with the 2022 Scoping Plan for residential and mixed-use developments. Specifically, individual projects shall incorporate the following actions, which shall be verified by the City prior to issuing a building permit for an individual project: a) Future mixed use residential and commercial developments shall be designed to support all-electric buildings and electric appliances. Natural gas connections and activation shall be permitted when alternative renewable energy sources are demonstrably infeasible for a permitted use. Compliance shall be verified by City staff on building plans prior to granting building permits. b) Provide EV charging infrastructure that, at minimum, meets California Green Building Standards Code Tier 2 voluntary measures at the time of project approval.	Significant and unavoidable.

Impact	Mitigation Measure(s)	Residual Impact
Hazards and Hazardous Materials		
Impact HAZ-1. Development facilitated by the project may result in the release of hazardous materials. However, compliance with federal, state, and regional regulations related to hazardous materials would minimize the risk of releases and exposure to these materials. Impacts would be less than significant.	None required.	Less than significant.
Impact HAZ-2. Development facilitated by the project may result in the release of hazardous materials within 0.25 mile of a school. However, compliance with regional and federal regulations related to hazardous materials would minimize the risk of releases and exposure to these materials. Impacts would be less than significant.	None required.	Less than significant.
Impact HAZ-3. Some housing sites, upzoning areas, and additional parcels are included on a list of hazardous materials sites compiled on a list pursuant to Government Code Section 65962.5. Development facilitated by the project in these areas could create a hazard to the public or the environment. However, required remediation and compliance with applicable regulations would reduce impacts to a less than significant level.	None required.	Less than significant.
Impact HAZ-4. Development facilitated by the project would not result in a safety hazard or excessive noise from the nearest airport for people residing or working in the project area. Impacts would be less than significant.	None required.	Less than significant.
Impact HAZ-5. Development facilitated by the project would not result in any physical changes that could interfere with or impair emergency response or evacuation, and the project would not result in interference with these types of adopted plans. Impacts would be less than significant.	None required.	Less than significant.
Impact HAZ-6. Several sites are located within or adjacent to a Fire Hazard Severity Zone. However, compliance with state and federal regulations and City policies would reduce the risk of loss, injury, or death involving wildland fires to a less than significant level.	None required.	Less than significant.
Hydrology and Water Quality		
Impact HYD-1. The project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. This impact would be less than significant.	None required.	Less than significant.

Impact	Mitigation Measure(s)	Residual Impact
Impact HYD-2. The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. This impact would be less than significant.	None required.	Less than significant.
Impact HYD-3. The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site. This impact would be less than significant.	None required.	Less than significant.
Impact HYD-4. The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on or off site. This impact would be less than significant.	None required.	Less than significant.
Impact HYD-5. The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This impact would be less than significant.	None required.	Less than significant.
Impact HYD-6. The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. No impact would occur.	None required.	No impact.
Impact HYD-7. The project would not risk the release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. No impact would occur.	None required.	No impact.
Impact HYD-8. The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This impact would be less than significant.	None required.	Less than significant.

Impact	Mitigation Measure(s)	Residual Impact
Land Use and Planning		
Impact LU-1. Development facilitated by the project would not physically divide an established community. Impacts would be less than significant.	None required.	Less than significant.
Impact LU-2. Implementation of the proposed project would be consistent with applicable regional and land use plans or regulations. This impact would be less than significant.	None required.	Less than significant.
Noise		
Impact NOI-1. Construction of individual development facilitated by the project would temporarily produce high noise levels, potentially affecting nearby noise-sensitive land uses. Operation of development facilitated by the project would also increase transportation noise. Impacts would be significant and unavoidable.	**NOI-1(a) Measures to Reduce Construction Noise**. To minimize noise during construction facilitated by the project, the City of Pacific Grove shall require construction contractors to implement the as many of the following measures for construction activities conducted within the City as feasible. Construction plans submitted to the City shall include construction noise analysis and identify these measures on demolition, grading, and construction plans submitted to the City. The City of Pacific Grove Building Division shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading and/or building permits. ▪ Mufflers. During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. ▪ Stationary Equipment. All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers. ▪ Equipment Staging Areas. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers. ▪ Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction in compliance with applicable safety laws and regulations. ▪ Electrically-Powered Tools and Facilities. Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities. ▪ Noise Disturbance Coordinator. The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints	Significant and unavoidable.

Impact	Mitigation Measure(s)	Residual Impact
	about construction noise. The disturbance coordinator shall determine the cause of any noise complaint and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator and the City shall be posted at the construction site. ▪ Temporary Noise Barriers. Erect temporary noise barriers when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA Leq at residential receivers, schools or other sensitive receptors during the daytime) or when the anticipated construction duration is greater than is typical (e.g., two years or greater) and there are sensitive receptors within 500 feet of the construction site. Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class 32 or higher. **NOI-1(b) Evaluate and Reduce Stationary Operational Noise.** The City shall require applicants of development projects facilitated by the project and located within 50 feet of noise-sensitive uses (including but not limited to residences, schools, and medical care facilities) to evaluate potential on-site operational noise impacts on nearby noise-sensitive uses. The project applicant shall be required to implement stationary operational noise reduction measures if noise generated by operation of the project is anticipated to exceed the following noise levels established by the City's General Plan Health and Safety Element: ▪ An hourly Leq of 50 dB or greater between 7:00 a.m. and 10:00 p.m. ▪ An hourly Leq of 45 dB or greater between 10:00 p.m. and 7:00 a.m. ▪ A maximum sound level of 70 dB or greater between 7:00 a.m. and 10:00 p.m. ▪ A maximum sound level of 65 dB or greater between 10:00 p.m. and 7:00 a.m. Examples of measures to reduce on-site noise include, but are not limited to, operational restrictions, selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers. Measures to reduce stationary operational noise shall be submitted to the City prior to issuance of building permits. Projects that are not anticipated to exceed the above noise levels shall not be required to implement stationary operational noise reduction measures.	

Impact	Mitigation Measure(s)	Residual Impact
Impact NOI-2. Construction of individual development facilitated by the project could temporarily generate groundborne vibration, potentially affecting adjacent sensitive land uses. Impacts would be less than significant with mitigation.	**NOI-2 Measures to Reduce Construction Vibration.** Prior to issuance of a building permit for development facilitated by the project requiring any of the following activities, the project applicant shall prepare a groundborne noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these construction activities. ▪ Pile driving during construction within 135 feet of fragile structures such as historical resources ▪ Pile driving during construction within 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings) ▪ Pile driving during construction within 75 feet of engineered concrete and masonry (no plaster) ▪ Use of a vibratory roller within 40 feet of fragile historical resources or 25 feet of any other structure ▪ Use of a dozer or other large earthmoving equipment within 20 feet for a fragile historical structure or 15 feet of any other structure This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The groundborne noise and vibration analysis shall include measures to ensure that vibration levels shall not exceed FTA architectural damage thresholds (e.g., 0.12 in/sec PPV for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower earthmoving equipment shall be used. If necessary, construction vibration monitoring shall be conducted to verify FTA vibration thresholds are not exceeded.	Less than significant.
Impact NOI-3. Development facilitated by the project would be located outside of noise contours associated with nearby airports. Impacts would be less than significant.	None required.	Less than significant.
Population and Housing		
Impact POP-1. The project would not directly or indirectly induce substantial unplanned growth. This impact would be less than significant.	None required.	Less than significant.

Impact	Mitigation Measure(s)	Residual Impact
Impact POP-2. Development facilitated by the project would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.	None required.	Less than significant.
Public Services and Recreation		
Impact PS-1. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered fire facilities to maintain acceptable service ratio response times or other objectives. Impacts would be less than significant.	None required.	Less than significant.
Impact PS-2. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered police facilities to maintain acceptable service ratio response times or other objectives. Impacts would be less than less than significant.	None required.	Less than significant.
Impact PS-3. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered school facilities. Impacts would be less than significant.	None required.	Less than significant.
Impact PS-4. Development facilitated by the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered library or other public facilities to maintain acceptable service objectives, and the payment of property taxes funding library or other public facilities would be required. Impacts would be less than significant.	None required.	Less than significant.
Impact PS-5. Development facilitated by the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or recreation facilities to maintain acceptable service ratios and would not increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.	None required.	Less than significant.

Impact	Mitigation Measure(s)	Residual Impact
Transportation		
Impact TRA-1. The proposed project would be consistent with applicable programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be less than significant.	None required	Less than significant.
Impact TRA-2. The project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). This impact would be less than significant.	None required.	Less than significant.
Impact TRA-3. Development facilitated by the project would comply with local construction requirements and design standards, which would minimize the potential to result in circulation hazards due to geometric design features or incompatible uses. This impact would be less than significant.	None required.	Less than significant.
Impact TRA-4. Development facilitated by the project would comply with local construction requirements and design standards which would minimize the potential to result in inadequate emergency access. This impact would be less than significant.	None required.	Less than significant.
Tribal Cultural Resources		
Impact TCR-1. No tribal cultural resources listed or eligible for listing in the CRHR or a local register, nor any determined significant by the City of Pacific Grove, were identified within or near the project area. No impact would occur.	None required.	No impact.
Utilities and Service Systems		
Impact UTIL-2. Development facilitated by the proposed project would increase demand for utility infrastructure; however, no substantial relocation or construction of utility services would be required to service development facilitated by project beyond existing conditions. Impacts would be less than significant.	None required.	Less than significant.

Impact	Mitigation Measure(s)	Residual Impact
Impact UTIL-2. Development facilitated by the project would increase demand for water supply from Cal-Am's Monterey Main System. Sufficient water supply would be available to meet all demands during normal, single-dry, and multiple dry year conditions with operation of the Monterey Peninsula Water Supply Project Ocean Desalination Plant, anticipated to be online in 2030. To address any potential shortfalls that may occur prior to operation of the Ocean Desalination Plant, Mitigation Measure UTIL-2 requires that city approval of future development under the proposed project would be contingent upon project-specific water supply verification, ensuring that projects would not be implemented without sufficient available water supply. Impacts would be less than significant with mitigation.	**UTIL-2 Water Supply Verification.** Sufficient water supply availability must be verified for all projects under the City of Pacific Grove Housing Element Update, Zoning Ordinance Amendments, and General Plan Amendments. The City shall not issue any building permits for development projects requiring potable water until a Water Verification Report has been issued by the Monterey Peninsula Water Management District (MPWMD) confirming sufficient water supply is available for the project. Project applicants shall submit a detailed accounting of all project water demands to MPWMD, for consideration in issuing a Water Verification Report. Projects meeting the definition of a "Project" under California Water Code (CWC) Section 10912 must be evaluated in a Water Supply Assessment (WSA) in accordance with CWC Section 10910(f), subject to review and approval by MPWMD. Projects that are not subject to CWC Section 10912 must be evaluated in a Residential Water Release Form & Water Permit Application, subject to review and approval by MPWMD. Water Verification Reports issued by MPWMD shall be informed by project-specific demand information provided in the respective WSA or Residential Water Release Form & Water Permit Application. The Water Verification Report shall identify whether the proposed project requires additional water credits to meet project demands, in addition to any existing water credits that may be associated with the project site(s).	Less than significant.
Impact UTIL-3. Development facilitated by the project would increase the amount of solid waste that is transported to and disposed of at the Monterey Peninsula Landfill. This solid waste would not exceed State or local standards or the capacity of local infrastructure. This impact would be less than significant.	None required.	Less than significant.
Wildfire		
Impact W-1. The proposed project would update the City of Pacific Grove's Health and Safety Element of the General Plan, including updates to policies that address emergency access, response, and preparedness. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.	None required.	Less than significant.

Impact	Mitigation Measure(s)	Residual Impact
Impact W-2. The city contains minimal slopes and experiences prevailing winds originating from the Pacific Ocean. Development facilitated by the project would adhere to the CFC and be reviewed by MFD to ensure development would not exacerbate wildfire risk due to slope, prevailing winds, or other factors. Therefore, this impact would be less than significant.	None required.	Less than significant.

1 Introduction

This document is the Draft Environmental Impact Report (DEIR) for the City of Pacific Grove (City) Housing Element Update, Zoning Ordinance Amendments, and General Plan Amendments (hereafter referred to as the "proposed project" or "project"). The "Housing Element Update" encompasses the 6th Cycle Housing Element. The "Zoning Ordinance Amendments" covers rezonings and upzonings determined to be necessary as a result of the Housing Element Update, additional rezonings proposed by the City and the inclusion of objective design standards. The "General Plan Amendments" encompass updates to the Health and Safety Element and Land Use Element of the General Plan.

This chapter discusses (1) the project and DEIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the DEIR; (4) issue areas found not to be significant; (5) the intended uses of the DEIR; (6) the lead, responsible, and trustee agencies; and (7) the environmental review process required under the California Environmental Quality Act, California Public Resources Code Section 21000, *et seq.* (CEQA). The proposed project is described in detail in Chapter 2, *Project Description*.

1.1 Environmental Impact Report Background

The City of Pacific Grove distributed a Notice of Preparation (NOP) of the DEIR for a 30-day agency and public review period starting on January 26, 2024, and ending on February 26, 2024. In addition, the City held an EIR Scoping Meeting on February 15, 2024. The meeting, held from 6:00 PM to 7:30 PM, was aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members. The meeting was held in Pacific Grove at the City Hall Council Chamber and via Zoom. In addition to verbal comments provided at the Scoping Meeting, the City received letters from four agencies, one tribal organization, and 13 members of the public in response to the NOP during the public review period. The NOP is presented in Appendix A of this DEIR, along with the NOP responses received. Table 1-1 on the following page summarizes the content of the letters and verbal comments and indicates where the issues raised are addressed in the DEIR.

1.2 Purpose and Legal Authority

The proposed project requires the discretionary approval of the City of Pacific Grove City Council; therefore, the project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines* (California Code of Regulations, Title 14, Section 15000, *et seq.*), the purpose of this DEIR is to serve as an informational document that:

> "...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This DEIR has been prepared as a Program EIR pursuant to Section 15168 of the *CEQA Guidelines*. A Program EIR is appropriate when a series of actions that can be characterized as one large project are being considered.

This DEIR is to serve as an informational document for the public and City of Pacific Grove decision makers. The process will include public hearings before the Planning Commission and City Council to consider certification of a Final EIR and approval of the proposed project.

Table 1-1 NOP Comments and DEIR Response

Commenter/ Comment Topic	Comment	How and Where It Was Addressed
Agency Comments		
Native American Heritage Commission	The proposed project is subject to the requirements and provisions under Assembly Bill (AB) 52 and Senate Bill (SB) 18 for tribal cultural resources.	Consultation required by AB 52 and SB 18 was carried out by the City of Pacific Grove. AB 52 consultation results are discussed in Section 4.15, *Tribal Cultural Resources*.
	Recommends conducting an archaeological records search and Sacred Lands File search. Recommends an archaeological survey based on the results of the records search. Requests the inclusion of specific mitigation related to archaeological resources and tribal cultural resources.	Comments are addressed in Section 4.4*, Cultural Resources*, and Section 4.15, *Tribal Cultural Resources*.
California Geological Survey	Evaluate the potential for ground shaking and surface fault rupture hazards of proposed structures.	Comments are addressed in Section 4.6, *Geology and Soils*.
	Address landslide and liquefaction hazards of proposed structures.	
	Address tsunami hazards of proposed structures.	Comments are addressed in Section 4.9, *Hydrology and Water Quality.*
California Department of Toxic Substances Control	Active and inactive mitigation and cleanup sites may restrict permissible construction activities in the project area.	Comments are addressed in Section 4.8, *Hazards and Hazardous Materials*.
	Provide further information related to the project site and areas that may fall under Department of Toxic Substances Control oversight.	
California Department of Fish and Wildlife (CDFW)	CDFW is a trustee agency and responsible agency for this project.	CDFW is listed as a responsible agency and trustee agency in Section 1.6, *Lead, Responsible, and Trustee Agencies*.
	Address special-status species.	Comments addressed in Section 4.3, *Biological Resources.*
	Address the need for future development to acquire Incidental Take Permits.	
	Recommends mitigation be included that requires botanical surveys conducted in accordance with CDFW survey protocols, including avoidance of special-status plants, establishing buffers, and consultation with CDFW.	
	Recommends mitigation be included that requires pre-activity surveys for nesting birds, including the protection of active nests, establishing buffers, biological monitoring, and notification of CDFW.	
	Include a cumulative impact analysis for biological resources.	

Commenter/ Comment Topic	Comment	How and Where It Was Addressed
	Include information on Fish and Game Code Section 1600 et seq. requirements, including the potential need for future development to obtain a Lake and Streambed Alteration Agreement.	
	Consultation with the United States Fish and Wildlife Service is necessary for potential impacts to federally-listed species.	
	Use the cumulative impact analysis to develop project alternatives that avoid or minimize biological resources impacts.	Project alternatives are addressed in Section 6, *Alternatives*.
	Filing fees must be paid upon filing of the Notice of Determination.	In accordance with the *CEQA Guidelines*, if the lead agency approves the project, a Notice of Determination will be filed and fees will be paid as required (refer to Section 1.7, *Environmental Review Process*).
Tribal Organization Comments		
Esselen Tribe of Monterey County	The project area lies within the Esselen Tribe of Monterey County's cultural and ancestral landscape and is sensitive for the tribe. Cultural resources are located in the project area.	Comments addressed in Section 4.15, *Tribal Cultural Resources*
Public Comments		
Steven Lilley	A detailed timeline of the Housing Element, General Plan, and EIR should be provided.	This comment does not pertain to the analysis of the DEIR.
Jaine Haines	Requests inclusion of baseline population growth information to quantify the project's growth-inducing impacts.	Historical population data is provided in Section 4.12, *Population and Housing*, and growth-inducing impacts are addressed in Chapter 5, *Other CEQA-Required Discussions.*
	Assess the project's environmental impacts resulting from an increased need for parking spaces.	Transportation-related impacts are addressed in Section 4.14, *Transportation*. It should be noted that the provision of parking is not considered to be an environmental impact under CEQA.
	Requests analysis of the project's impacts on Parks and Recreation Element Goal 1 resulting from rezoning open space land.	Comments are addressed in Section 4.13, *Public Services and Recreation*.
	Requests description of the project's impacts on the City's water and sewage systems, solid waste disposal, and other public services.	Water, wastewater, and solid waste are addressed in Section 4.16, *Utilities and Service Systems*, and other public services are addressed in Section 4.13, *Public Services and Recreation*.
	Recommends consultation with the Pacific Grove Heritage Society Board of Directors regarding scenic resource impacts from the addition of 225 accessory dwelling units. The commenter also expresses concern related to historic districts and historical resources.	Scenic resources are addressed in Section 4.1, *Aesthetics*. Historical resources and districts are addressed in Section 4.4, *Cultural Resources*.

Commenter/ Comment Topic	Comment	How and Where It Was Addressed
	Requests an update to the current General Plan to adopt a Noise Element. The commenter requests that the Noise Element address the effects of noise on harbor seals, noise generated during construction from granite excavation, and noise from pickleball courts.	This comment does not pertain to the analysis of the DEIR. It should be noted that noise is addressed in the Health and Safety Element of the General Plan, which is being partially updated as part of the proposed project (refer to Chapter 2, *Project Description*).
	Requests a consistency analysis regarding rezoning Site 58 from U to R4, as related to the terms of the conservation easement for the Pacific Grove Monarch Butterfly Ecological Reserve.	This site is no longer being considered for rezoning; please refer to Chapter 2, *Project Description*, for the current list of proposed sites to be rezoned or upzoned.
	Requests an update to the current General Plan to include the City's Climate Action and Adaptation Plan.	This comment does not pertain to the analysis of the DEIR. The City General Plan's Health and Safety Element is being updated as part of the proposed project, including to ensure compliance with Senate Bill 379; please refer to Chapter 2, *Project Description*.
Jane Haines	Address conflicts with 1994 General Plan Transportation Element Policies 11, 14, and 19. Quantify existing parking availability and analyze parking impacts.	Potential conflicts with local land use policies are addressed in Section 4.10, *Land Use and Planning*. It should be noted that the provision of parking is not considered to be an environmental impact under CEQA.
	Consideration of additional alternatives that eliminate Sites 52 and 56, and designate Site 11 for a parking structure. The commenter suggests that a site be considered at Sinex Avenue (currently a portion of George Washington Park).	Sites 52 and 56 were removed from the Site Inventory; refer to Chapter 2, *Project Description*, for the current list of sites considered in this DEIR. Project alternatives are addressed in Chapter 6, *Alternatives*.
David Dilworth	Expresses concern for local animal species, plants, and trees, including the Monterey pine forest, and animals associated with the Carmel River.	Potential impacts to biological resources are addressed in Section 4.3, *Biological Resources.*
	Expresses concern for water quality and supply.	Water quality is addressed in Section 4.9, *Hydrology and Water Quality*. Water supply is addressed in Section 4.16, *Utilities and Service Systems*.
	Expresses concern related to traffic congestion and emergency response and evacuation.	Comments are addressed in Section 4.14, *Transportation*. It should be noted that traffic congestion (associated with Level of Service thresholds) is no longer considered an environmental impact under CEQA.
	Expresses concern related to existing lack of parking.	This comment does not pertain to the analysis of the DEIR. The provision of parking is not considered to be an environmental impact under CEQA.
Mike Gibbs	The commenter thanks David Dilworth.	This comment does not pertain to the analysis of the DEIR.

Commenter/ Comment Topic	Comment	How and Where It Was Addressed
Nancy Parsons	Expresses concerns related to habitat loss and endangered species.	Potential biological resource impacts are addressed in Section 4.3, *Biological Resources*.
	Expresses concern related to water supply availability.	Water supply is discussed in Section 4.16, *Utilities and Service Systems*.
	Expresses concern related to traffic congestion, air quality, and evacuation.	Comments are addressed in Section 4.14, *Transportation*, and Section 4.2, *Air Quality*. It should be noted that traffic congestion is no longer considered an environmental impact under CEQA.
	Expresses concern for the funding of infrastructure and water pollution.	Infrastructure is discussed in Section 4.16, *Utilities and Service Systems*. Water quality is addressed in Section 4.9, *Hydrology and Water Quality*.
	Expresses concern related to recreation, open space, and schools.	Comments are addressed in Section 4.13, *Public Services and Recreation*.
	Expresses concern related to wildfire.	Wildfire is discussed in Section 4.17, *Wildfire*.
Andrew Kubica	Suggests the addition of various sites within the city.	Refer to Chapter 2, *Project Description*, for the list of sites considered in this DEIR. Project alternatives are addressed in Chapter 6, *Alternatives*.
	Requests public transportation be added.	Public transportation is discussed in Section 4.14, *Transportation*.
	Requests sewer capacity and public services be expanded.	Wastewater and public utilities are addressed in Section 4.16, *Utilities and Service Systems*.
Marcia Wright	Requests the removal of Site 56 (1025 Lighthouse Avenue) and Site 52 (1004 David Avenue) from the Site Inventory. Suggests the addition of the Mission Linen property at 801 Sunset Drive.	The referenced sites were removed from or added to the Site Inventory; refer to Chapter 2, *Project Description*, for the current list of sites considered in this DEIR.
	Affordability should be spread across the housing sites.	This comment does not pertain to the analysis of the DEIR. The proposed affordability scenario for each housing site is provided in the draft Housing Element.
	Requests analysis of impacts to monarch butterflies, including from light and noise.	Comments are addressed in Section 4.3, *Biological Resources*.
	Requests a detailed discussion of water supply availability, including moratoriums and overdraft of the Seaside Aquifer, and a discussion of water quality.	Comments are addressed in Section 4.9, *Hydrology and Water Quality,* and Section 4.16, *Utilities and Service Systems*.
	Expresses concern related to wildfire hazards and fire insurance.	Comments are addressed in Section 4.17, *Wildfire*. It should be noted that socioeconomic issues, such as the ability to obtain fire insurance, are not considered environmental impacts under CEQA.

Commenter/ Comment Topic	Comment	How and Where It Was Addressed
	Requests the City ask the California Department of Housing and Community Development for reports forecasting new industries and businesses in the city that would necessitate housing.	This comment does not pertain to the analysis of the DEIR.
	Requests that the Pacific Gas and Electric Company provide statistics related to blackouts.	Electricity usage is discussed in Section 4.16, *Utilities and Service Systems*.
Luke Coletti	Requests the DEIR include an analysis of land use impacts as related to Senate Bill 35 and Senate Bill 423.	Land use impacts are discussed in Section 4.10, *Land Use and Planning*.
Claudia Sawyer	Provides comments related to historic preservation.	Historical resources are addressed in Section 4.4, *Cultural Resources*.
	Asks about form-based codes and objective design standards.	Please refer to Chapter 2, *Project Description*, regarding project components.
	Requests that hazards be mitigated, including from lead, asbestos, and mold.	Hazardous materials are addressed in Section 4.8, *Hazards and Hazardous Materials*.
	Provides comments related to generator noise.	Comments are addressed in Section 4.11, *Noise*.
	Requests that circulation issues be addressed.	Comments are addressed in Section 4.14, *Transportation*.
Margaret Thum	Expresses concern related to impacts to wildlife.	Comments are addressed in Section 4.3, *Biological Resources*.
	Expresses concern related to traffic congestion impacts.	Comments are addressed in Section 4.14, *Transportation*. It should be noted that traffic congestion is no longer considered an environmental impact under CEQA.
	Expresses concern related to utility infrastructure and water moratorium.	Comments are addressed in Section 4.16, *Utilities and Service Systems*.
Janet Gray	Requests the removal of Site 52, David Avenue School.	The referenced site was removed from the Site Inventory; refer to Chapter 2, *Project Description*, for the current list of sites considered in this DEIR.
	Expresses concern related to traffic congestion and increased vehicle trips.	Comments are addressed in Section 4.14, *Transportation*. It should be noted that traffic congestion is no longer considered an environmental impact under CEQA.
	Expresses concern related to noise and aesthetics.	Comments are addressed in Section 4.11, *Noise*, and Section 4.1, *Aesthetics*.
	Expresses concern related to habitat destruction and wildlife.	Comments are addressed in Section 4.3, *Biological Resources*.
Scoping Meeting Comments		
Public Services and Utilities	Concerns about the strain on local infrastructure and services, including schools, public services, water supply, electricity, and recreation.	Comments are addressed in Section 4.13, *Public Services and Recreation,* and Section 4.16, *Utilities and Service Systems*.

Commenter/ Comment Topic	Comment	How and Where It Was Addressed
Transportation and Circulation	Concerns about roadway capacity, increased traffic congestion, and parking demand from new development. Requests for mitigation strategies, including improved walkability, alternative transportation, and updates to Circulation Element policies.	Comments are addressed in Section 4.14, *Transportation*. It should be noted that the provision of parking is not considered an environmental impact under CEQA. Similarly, traffic congestion is no longer considered an environmental impact under CEQA.
Aesthetics	Concern about aesthetics.	Comments are addressed in Section 4.1, *Aesthetics*.
Historic Resources	Concern about historic buildings.	Comments are addressed in Section 4.4, *Cultural Resources*.
Biological Resources	Concerns related to wildlife, including monarch butterflies.	Comments are addressed in Section 4.3, *Biological Resources*.
Noise	Concerns about increased noise levels from additional traffic and backup generators.	Comments are addressed in Section 4.11, *Noise*.
Greenhouse Gas Emissions	Concern about greenhouse gas emissions from new development on undeveloped land.	Comments are addressed in Section 4.7, *Greenhouse Gas Emissions.*
Wildfire	Concern about wildfire risk.	Comments are addressed in Section 4.17, *Wildfire*.
Population Growth	Concern about buildout and historic growth in the city.	Comments are addressed in Section 4.12, *Population and Housing*.

1.3 Scope and Content

This DEIR addresses impacts that may be potentially significant. The following issues have been studied in detail in this DEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

In preparing the DEIR, the City made use of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Chapter 7, *References*.

The alternatives analysis of the DEIR (Chapter 6) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives chapter identifies the “environmentally superior”

alternative among the alternatives assessed. The alternatives evaluated include the CEQA required "No Project" alternative and two alternative development scenarios for the project area.

The level of detail contained throughout this DEIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based:

> "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure."

1.4 Issues Not Studied in Detail in the DEIR

Two issue areas from the environmental checklist are addressed in Section 4.18, *Effects Found Not to be Significant*. As indicated therein, there is no substantial evidence that significant impacts would occur in these issue areas:

- Agriculture and Forestry Resources
- Mineral Resources

1.5 Intended Uses of this DEIR

This DEIR is an informational document for use in the City's review and consideration of the proposed project. This document is a Program EIR. Section 15168(a) of the *CEQA Guidelines* states that:

> A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in a chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria, to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

As a programmatic document, this DEIR presents and discloses a region-wide assessment of the environmental impacts of the proposed project. The information and analysis in this DEIR will be used by the Pacific Grove Planning Commission and City Council, as part of intergovernmental consultations, and by trustee agencies and the general public.

The proposed Housing Element Update, Zoning Amendments, and General Plan Amendments will guide subsequent actions taken by the City in its review of new development projects and the establishment of new and/or revised City-wide or area-specific programs. This Program EIR serves as a first-tier environmental document under CEQA, supporting second-tier environmental documents for projects with detailed designs that have been developed for implementation within the City. Analysis of site-specific impacts of individual projects is not the intended use of a Program EIR. Specific projects are not currently defined to the level that would allow for such an analysis at this time. Individual and specific environmental analysis of each project will be undertaken as necessary

in the future by the City prior to each project being considered for approval. Therefore, the City, acting as the lead agency, would be able to prepare subsequent environmental documents that incorporate by reference the appropriate information from this Program EIR regarding secondary effects, cumulative impacts, broad alternatives, and other relevant factors. If the City finds that implementation of a later activity would have no new effects and that no new mitigation measures would be required, that activity would require no additional CEQA review. Where subsequent environmental review is required, such review would focus on significant effects specific to the project or its site that have not been considered in this Program EIR.

1.6 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. The City of Pacific Grove is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. Responsible agencies include the California Department of Housing and Community Development, California Department of Forestry and Fire Protection, and the California Board of Forestry. The DEIR will also be submitted to these agencies for review and comment. Agencies that may have approval authority over future development facilitated by the project include California Department of Transportation, CDFW, Monterey Bay Air Resources District, and Central Coast Regional Water Quality Control Board.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. CDFW is a trustee agency with regard to fish and wildlife of the state, designated rare or endangered native plants, and to game refuges, ecological reserves, and other areas administered by the department (*CEQA Guidelines* Section 15386).

1.7 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below. The steps are presented in sequential order.

1. **Notice of Preparation (NOP).** After deciding that an EIR is required, the lead agency (City of Pacific Grove) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Sections 21092 and 21092.2). The NOP must be posted in the County Clerk's office for 30 days.
2. **DEIR Prepared.** The DEIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion (NOC) and Notice of Availability (NOA).** The lead agency must file an NOC and NOA with the State Clearinghouse when it completes a Draft EIR. The lead agency must place the NOA in the County Clerk's office for at least 30 days (Public Resources Code Section 21091) and send a copy of the NOA to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; or c) direct mailing to owners and occupants of contiguous properties

(*CEQA Guidelines* Section 15087). The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Section 21092.5). The minimum public review period for a Draft EIR is 30 days. When a project involves a state agency approval or is of sufficient statewide, regional, or areawide significance, the public review period must be 45 days (Public Resources Code Section 21091).

4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency, and the decision making body reviewed and considered the information in the Final EIR prior to approving a project; and c) the Final EIR reflects the lead agency's independent judgment and analysis (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision (*CEQA Guidelines* Section 15093).
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (*CEQA Guidelines* Section 15097).
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094, Public Resources Code Sections 21108 and 21152). If the lead agency is a local agency, it must file the NOD with the County Clerk and State Clearinghouse. If the lead agency is a state agency, it only needs to file the NOD with the State Clearinghouse. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

2 Project Description

The proposed project analyzed in this Draft Environmental Impact Report (DEIR) is the City of Pacific Grove Housing Element Update, Zoning Ordinance Amendments, and General Plan Amendments (hereinafter referred to as the "project" or "proposed project"). The "Housing Element Update" encompasses the 6th Cycle Housing Element. The "Zoning Ordinance Amendments" covers rezonings and upzonings determined to be necessary as a result of the Housing Element Update, additional rezonings proposed by the City, and the inclusion of objective design standards. The "General Plan Amendments" encompass updates to the Health and Safety Element and Land Use Element of the General Plan. This chapter of the DEIR describes the key characteristics of the project, including the project proponent/lead agency, the geographic extent of the project, project objectives, required approvals, and the types and extent of development facilitated by the project.

2.1 Project Location

The City of Pacific Grove encompasses approximately 2.9 square miles (or approximately 1,830 acres) on the Monterey Peninsula in northern Monterey County (Figure 2-1). Pacific Grove is bordered by the Pacific Ocean and Monterey Bay to the north and west; the City of Monterey to the east; and the Del Monte Forest (a census-designated place) to the south (Figure 2-2). Pacific Grove is located approximately 15 miles to the southwest of Salinas and 50 miles to the south of San José. State Route 1 and Highway 68 provide regional access to the city, with local roadways (including Lighthouse Avenue and David Avenue) providing local access within the city.

The project area includes all areas within the city limits, as shown in Figure 2-2. Because potential new development facilitated by the project would be focused on the housing sites identified in the Housing Element, in upzoning areas, and on additional parcels not included in the Housing Element Site Inventory, the DEIR includes a particular emphasis on those sites and parcels, as depicted in Figure 2-3. The numbered sites in Figure 2-3 correspond to the Housing Element Site Inventory numbering convention.

2.2 Project Proponent

The City of Pacific Grove (City) is both the project proponent and the California Environmental Quality Act (CEQA) lead agency for the proposed project's EIR. The City's Community Development Department, located at 300 Forest Avenue, 2nd Floor, Pacific Grove, California 93950, directed preparation of this DEIR with the assistance of Rincon Consultants, Inc.

Figure 2-1 Regional Location

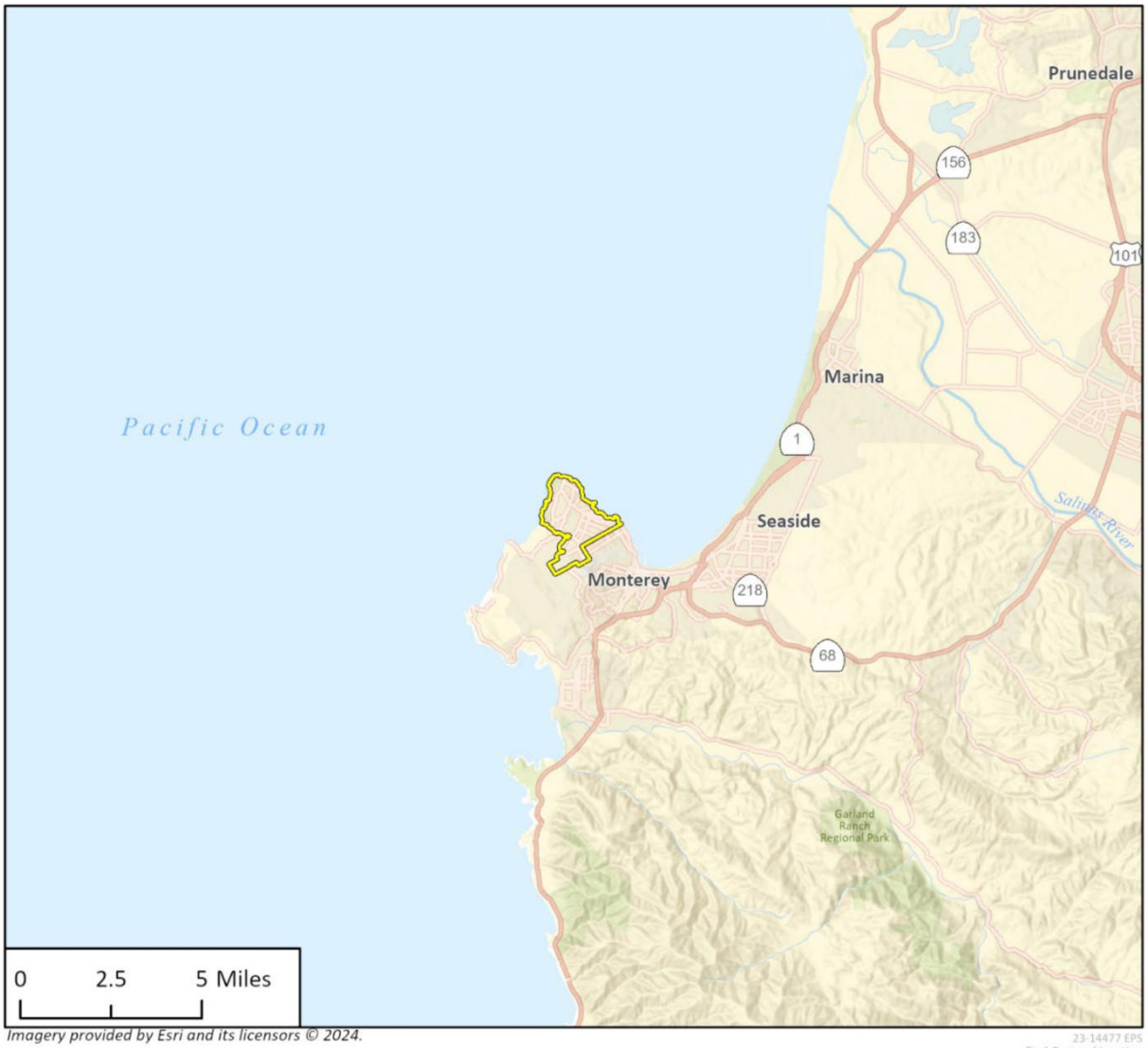
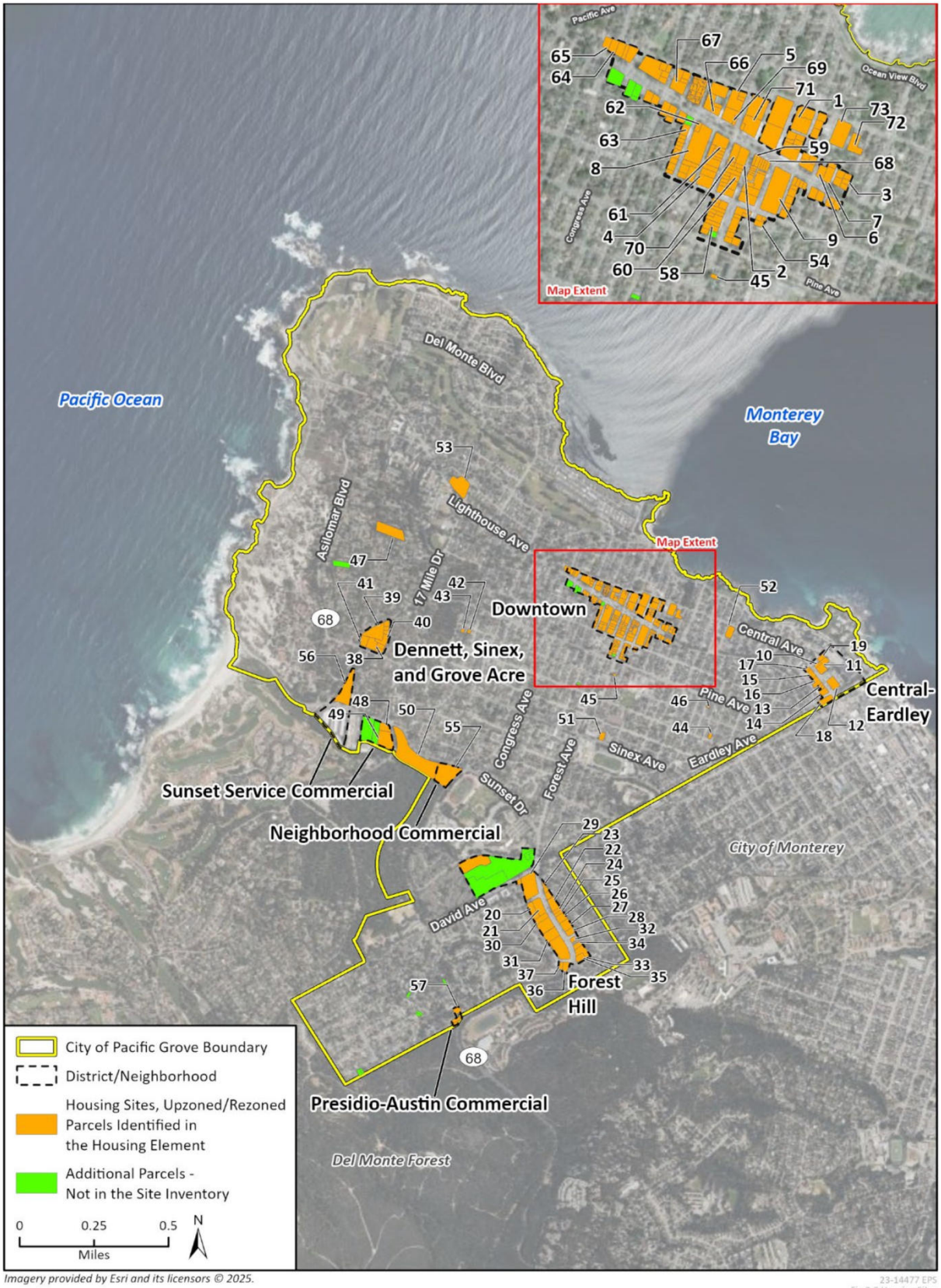


Figure 2-2 Project Area



Figure 2-3 Housing Sites, Upzoning and Rezoning Areas, and Additional Parcels



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23-14477 EPS
Fig 2-3 Housing Sites

2.3 Project Objectives

The project includes the following objectives:

- Provide capacity to meet the state-required Regional Housing Needs Allocation (RHNA) for the 6th Cycle Housing Element planning period of 2023-2031, including providing a buffer of 20 percent of the remaining RHNA for lower-[1] and moderate-income units to ensure no net loss.
- Ensure that the growth facilitated by the Housing Element is achievable, through associated amendments to the Zoning Code and/or Land Use Element of the General Plan.
- Disperse housing sites throughout the City to ensure that no single neighborhood or area is overburdened or impacted.
- Preserve historic, single-family neighborhoods.
- Improve fair housing conditions in the city by implementing meaningful actions. Provide for fair and equal housing opportunities for all persons, regardless of protected characteristics, including but not limited to, age, ancestry, sex, gender, gender expression, sexual orientation, religion, disability, family status, race, creed, color, or national origin.
- Continue existing and develop new programs and policies to meet the projected affordable housing need of extremely low, very low, low, and moderate-income households.
- Bring the General Plan into conformance with recently enacted state housing law, including Assembly Bill (AB) 1398, AB 747, Senate Bill (SB) 99, and SB 379; as well as update the City's Health and Safety Element to meet state requirements for general plan safety elements.
- Identify housing policies and programs that enable the development of additional units and the preservation of existing units, that reduce governmental constraints to building housing, and that affirmatively further fair housing.
- Encourage the development of by-right low-income housing for 6th Cycle housing sites proposed for rezoning and existing 4th and 5th Cycle housing sites that are reused in the 6th Cycle, increasing the overall availability of affordable housing.
- Identify appropriate housing sites and provide housing development opportunities in specified areas with the potential to accommodate additional housing or are proximate to jobs, transportation, shopping and schools, and the accompanying zoning required to accommodate housing development.

2.4 Existing Land Uses, General Plan Land Use Designations, and Zoning Designations

Pacific Grove is an established coastal community, primarily developed with residential neighborhoods and distinct historic architecture. Single-family residential land uses dominate most of the area in the central and southern parts of the city. Commercial uses and multi-family residential uses are concentrated along Lighthouse Avenue, which runs generally east-west in the northern portion of the city, and along Forest Avenue, which runs generally north-south in the southern and eastern portions of the city. Open space and dispersed single-family residences are located on the city's perimeter along the Pacific Ocean and Monterey Bay. The city's current General Plan land use designations and zoning are shown in Figure 2-4 and Figure 2-5.

[1] "Lower-income" includes both the very low and low income categories.

Figure 2-4 Existing General Plan Land Use Designations

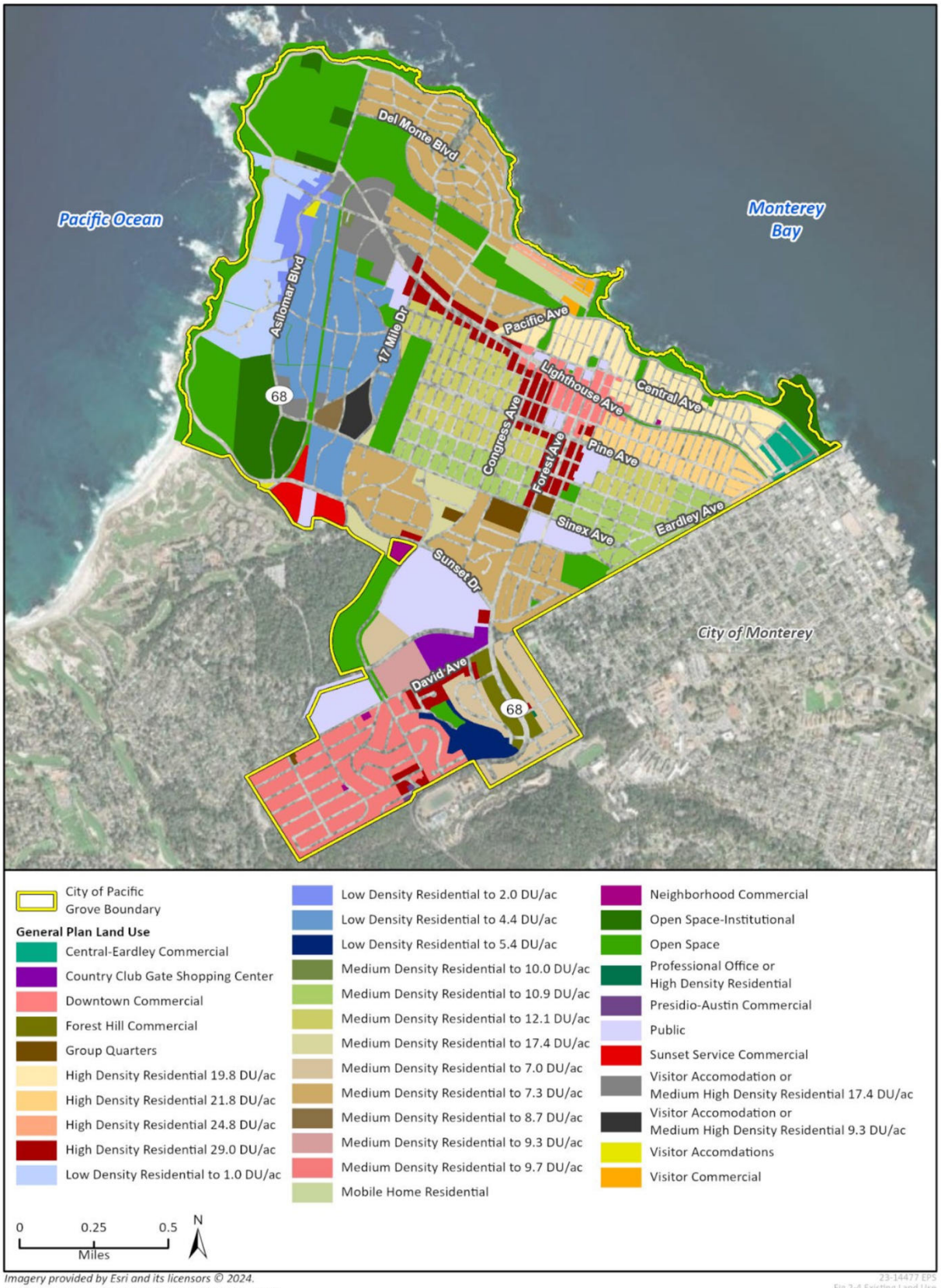
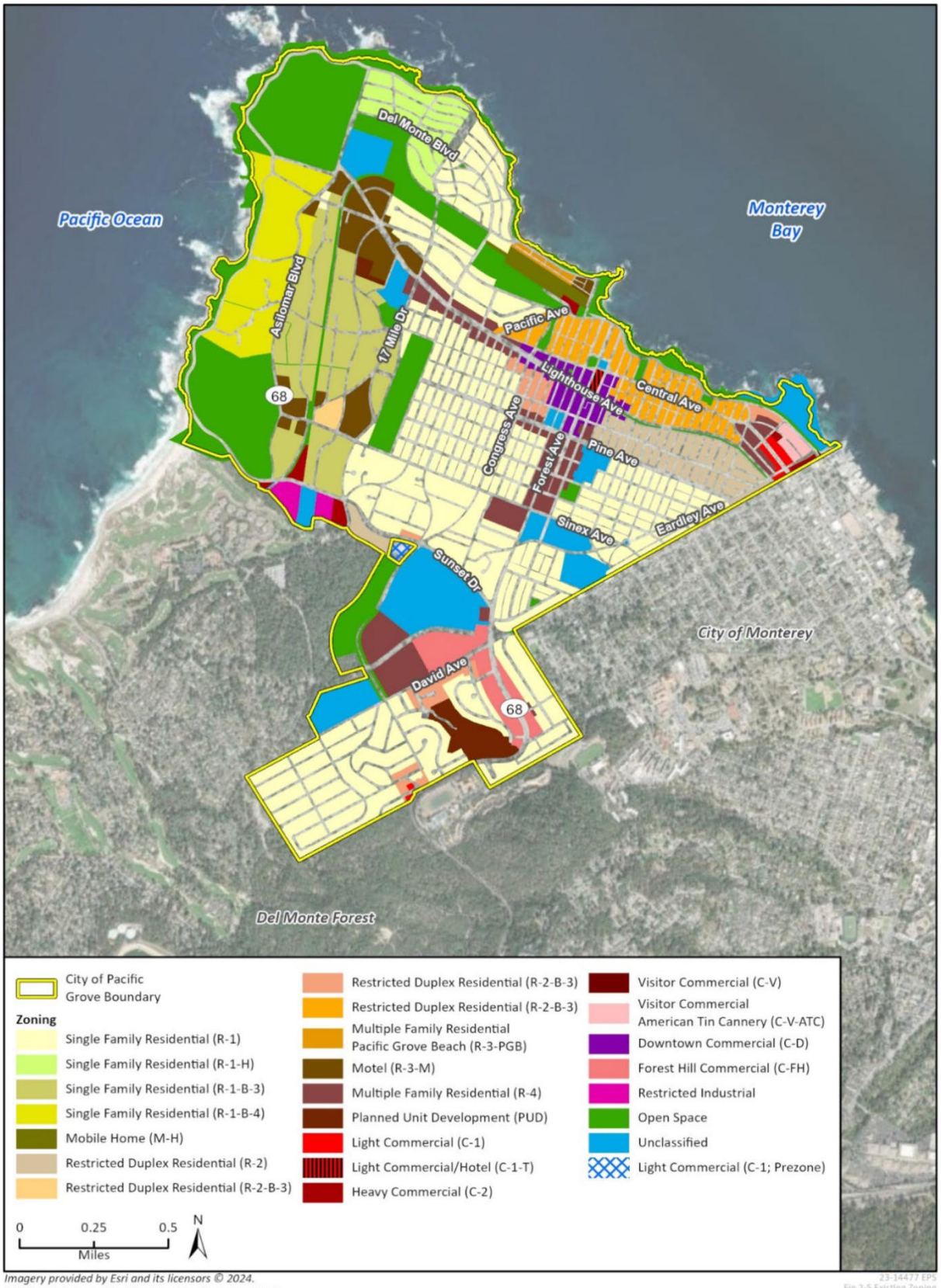


Figure 2-5 Existing Zoning



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Additional data provided by City of Pacific Grove, 2024.

23-14477 EPS
Fig 2-5 Existing Zoning

The housing sites identified in the Housing Element Update, associated upzoning areas and identified rezoning sites, and additional parcels for environmental analysis that are not included in the Site Inventory (Appendix A to the Housing Element, referred to therein as Compiled Site Inventory) but are studied in this DEIR are located throughout the city and are focused in several neighborhood districts, including the Downtown, Central-Eardley Commercial, Forest Hill, Dennett Street, Sinex Avenue, and Grove Acre Avenue, and areas zoned Light Commercial (C-1), Heavy Commercial (C-2), and Restricted Industrial (I) in the Sunset Service Commercial (SSC), Neighborhood Commercial (NC), and Presidio-Austin Commercial (PAC) Districts (Figure 2-3). These existing districts, and their specific existing General Plan land use designations and zoning designations, are described further in Chapter 3, *Environmental Setting*.

2.4.1 Surrounding Land Uses

To the north and west, Pacific Grove is bordered by Monterey Bay and the Pacific Ocean, and much of the city's northern and western boundaries consist of coastlines and beaches. To the southeast, Pacific Grove is bordered by residential and commercial uses within the City of Monterey, including the Cannery Row area on the city's southeastern boundary. To the south and southwest, Pacific Grove is bordered by the Presidio of Monterey and single-family residential uses, open space, and golf courses within the Del Monte Forest.

2.5 Existing Housing Development

As of 2022, there were a total of 8,195 housing units in Pacific Grove. As shown in Table 2-1, the majority (58 percent) of the units were single-family detached. Multi-family housing made up about 34 percent of the housing stock while mobile homes comprised less than 2 percent of units. Over the past decade, Pacific Grove has not experienced significant additions to the housing stock due to the high value of existing housing and limited suitable locations for new housing and redevelopment. The City's Housing Element Annual Progress Reports show the total number of housing units has increased by 184 units between 2014 and 2022.

Table 2-1 Housing Unit Types In Pacific Grove (2022)

Unit Type	Number	Percentage
Single Detached	4,734	57.8%
Single Attached	511	6.2%
Two to Four	1,104	13.5%
Five Plus	1,703	20.8%
Mobile Homes	143	1.7%
Total	**8,195**	**100.0%**

Source: California Department of Finance 2022

Pacific Grove has not experienced much new housing development in recent years. Nine percent of Pacific Grove's housing units were built in the past 30 years (after 1990), while more than 50 percent of housing stock dates from before 1950 (United States Census Bureau 2020). Most of the city's housing units are over 50 years old, with older units concentrated around the Downtown area.

2.6 Project Characteristics

The proposed project consists of the following components:

- Updating and adopting the City's Housing Element
- Amending the City's Zoning Code and zoning map to:
  - Increase the maximum allowed development density and establish a minimum residential density of the Downtown Commercial (C-D) Zoning Districts and Forest Hill Commercial (C-FH) Zoning Districts ("upzoning")
  - Remove the requirement that maximum allowed development density in C-1 and C-2 zones outside the Coastal Zone are equal to that of the nearest General Plan residential land use category ("upzoning")
  - Rezone the Dennett, Sinex, and Grove Acre District to allow higher density residential development ("rezoning")
  - Rezone one housing site (Site 50) to allow higher density residential development ("rezoning")
  - Update the mixed-use and residential development standards which constrain housing from meeting maximum densities (e.g., reduce parking requirements for multi-family housing and establish appropriate development standards to achieve the increased maximum allowable densities in the C-D and C-FH Zoning Districts)
  - Include objective design standards for multi-family residential and mixed-use development
  - Address administrative provisions including amendments to permitting processes to support residential streamlining requirements including establishing a process to allow for by right processing of projects that include a specified number of affordable housing units
  - Incorporate state mandated affordable housing requirements including use requirements for single room occupancy housing, parking standards for supportive housing and emergency shelters, use requirements for low barrier navigation centers, compliance standards for employee housing, use standards for large residential care facilities, and objective standards for reasonable accommodation
  - Update development standards for accessory dwelling units (ADU) to comply with state ADU law
  - Develop a local density bonus program to offer incentives beyond those required by state density bonus law
- Amend the City's General Plan Land Use Element and land use map to ensure consistency with the Housing Element Update and zoning amendments
- Amend the City's Health and Safety Element to comply with recent state legislation

These project components are discussed further below.

2.6.1 Housing Element Update

The draft 6th Cycle Housing Element is available on the City's website: www.cityofpacificgrove.org/HousingElement.

As required by state law, the Housing Element includes the following components:

- An **Introduction** that discusses the City's vision for meeting the housing needs of its residents, the statutory framework, the Housing Element requirements, its relationship to other elements, and a discussion of public participation.
- A **Community Profile** that offers demographic information, including the city's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations.
- An analysis of **Housing Needs and Constraints**, which discusses the resources and limitations related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs and the availability of financing for home acquisition.
- A discussion of **Housing Resources** which includes a discussion of Pacific Grove's RHNA allocation, how the allocation is already being met, and by what means the remaining allocation will be addressed, along with the housing site inventory, and the affordability, suitability, and availability analysis.
- An assessment of the **Affirmatively Furthering Fair Housing** obligation that summarizes fair housing issues, assesses the City's fair housing enforcement for new development, and compares Pacific Grove to Monterey County as a whole.
- A **Housing Plan** with goals and programs to conserve and improve the conditions of the existing housing stock, provide adequate housing throughout the city, consider housing for people with special needs, ensure fair housing needs are met, and implement community-wide sustainability that balances social, environmental, and economic needs while protecting natural resources and attending to social inequalities.
- **Appendices** that summarize the residential site inventory (Appendix A), an assessment of Affirmatively Furthering Fair Housing (Appendix B), a review of the past accomplishments of the 5th Cycle Housing Element (Appendix C), and a review of public engagement and input (Appendix D).

Regional Housing Needs Allocation and Buffer

According to state law, a housing element must address the City's fair share of the regional housing need and specific state statutory requirements and must reflect the vision and priorities of the local community. In October 2022, the Association of Monterey Bay Area Governments (AMBAG) adopted a RHNA plan, allocating 1,125 units for Pacific Grove (refer to Table 2-2), of which 599 units must be affordable to low-income or very low-income households (AMBAG 2022).

Table 2-2 City of Pacific Grove Regional Housing Needs Allocation

	Income Category*			
	Very Low (31-50%) and Low (51-80%)	Moderate (81-120%)	Above Moderate (above 120%)	Total Housing Units
RHNA Housing units	599	142	384	1,125

*Percentage of area median income

Source: City of Pacific Grove 2023

The California Department of Housing and Community Development (HCD) requires local jurisdictions to identify sufficient housing sites to cover the jurisdiction's 6th Cycle RHNA. HCD also recommends that jurisdictions provide additional buffer capacity above the RHNA. The "No Net Loss" law (Government Code Section 65863) requires maintenance of sufficient sites to meet the RHNA for all income levels throughout the planning period. The recommendation from HCD is to adopt a housing Site Inventory with a buffer of at least 15 to 30 percent over the allocated RHNA, in case constraints limit building on any given site. The Housing Element Update includes a 20 percent buffer for very low, low, and moderate-income units. The 20 percent buffer is applied to the remaining RHNA for the very low-, low-, and moderate-income categories after accounting for pipeline projects and ADUs, which are referred to as RHNA credits, anticipated to be developed during the 6th Cycle. This is described further below.

Meeting the Regional Housing Needs Allocation Plan Objectives

To meet the objectives of the 6th Cycle RHNA and provide sufficient capacity for housing development, the Housing Element specifies sites for residential development and identifies sites to increase permitted residential densities to meet affordability requirements, in part by increasing the allowed development density of certain Zoning Districts or by rezoning specific housing sites.

The Housing Element in and of itself does not develop housing. It is a plan to provide for the possibility of housing, supported by consistent zoning standards. The Housing Element assumes that not all housing would realistically be built, based on previous development history in Pacific Grove, as housing development is mainly accomplished by the private sector and depends upon factors the City does not control, including financial resources, market trends, and other factors. To provide the most conservative analysis, this DEIR assesses the highest range of development potential, meaning it assumes that all housing units accommodated in the Housing Element might be built during the 8-year planning period. This scenario assumes that future development occurs at a rate higher than it has historically in the City.

The Housing Element Update integrates and updates supporting socioeconomic, demographic, and household data, and is specifically intended to accommodate the City's RHNA plus buffer. Residential developments approved but not yet occupied ("pipeline projects") can be credited towards the City's RHNA for the 6th Cycle Housing Element, provided the City can demonstrate the units can be built by the end of the 6th Cycle's planning period. Similarly, units within completed projects which have received a certificate of occupancy since June 30, 2023, can also be credited towards the RHNA. This allocation will be met with the following resources.

Accessory Dwelling Units and Pipeline Projects

ADU and junior ADUs anticipated to be built between 2023 and 2031 are credited towards the City's RHNA pursuant to Government Code Section 65583.1. The City of Pacific Grove Building Division permitted one ADU in 2019, 20 ADUs in 2020, 40 ADUs in 2021, 43 ADUs in 2022, and 34 ADUs in 2023, for an average of 28 ADUs per year.

On February 16, 2022, the City of Pacific Grove amended its ADU Ordinance to establish a ministerial approval process for ADUs, which streamlines the approval process by requiring compliance with applicable objective standards. The Site Inventory conducted for the Housing Element conservatively uses the average number of ADUs permitted from 2019 to 2023 to establish ADU trends for the 6th Cycle. Between 2019 and 2023 an average of 28 ADUs were permitted each year. Assuming 28 building permits would be issued per year, the City has assumed a total of 224 ADUs would be constructed between June 2023 and December 2031.

The Association of Bay Area Governments, the regional planning agency for nine San Francisco Bay Area counties, conducted an analysis of ADU affordability and concluded approximately 30 percent of ADUs are affordable to very low-income households, 30 percent affordable to low-income households, 30 percent affordable to moderate income households, and 10 percent affordable to above-moderate income households (Association of Bay Area Governments 2022). Due to the proximity of Pacific Grove to the Association of Bay Area Governments region and similarly high housing costs, the Housing Element assumes that 60 percent of ADUs would be affordable to lower-income households, 30 percent to moderate income households, and 10 percent to above moderate-income households.

There is one active housing project in the city which would include 10 housing units. Therefore, accounting for pipeline projects as well as projected ADUs, the City of Pacific Grove has a remaining RHNA of 891 units. Table 2-3 shows the remaining RHNA plus the 20 percent buffer after accounting for planned and approved projects and projected ADUs. The City must demonstrate its ability to meet the remaining housing needs through the identification of sites suitable for housing development.

Table 2-3 Progress Toward Meeting RHNA

	Income Category *			
	Very Low (31-50%) and Low (51-80%)	Moderate (81-120%)	Above Moderate (above 120%)	Total Housing Units
Total RHNA	599	142	384	1,125
Pending and Approved Projects	1	0	9	10
Estimated ADUs	134	68	22	224
Remaining RHNA	**464**	**74**	**353**	**891**
20% Buffer for Very Low-, Low-, and Moderate-Income Categories	93	15	0	108
Remaining RHNA + 20% buffer	**557**	**89**	**353**	**999**

*Percentage of area median income

Source: City of Pacific Grove 2024

Residential Site Inventory

To accommodate the remaining RHNA plus the 20 percent buffer for very low-, low-, and moderate-income categories (999 units), strategic sites in the city were selected as suitable locations for future housing. Several constraints were considered when identifying each site, including vacancy and utilization of sites, environmental concerns, utility or infrastructure access, historic resources, feasibility of redevelopment during the next planning period, and realistic capacity assumptions. To establish realistic unit assumptions for identified sites, the City looked at recent projects in the city and neighboring communities around the Monterey Peninsula area (as seen in Chapter 2 of the Housing Element Update) that have similar market demands as Pacific Grove. Due to the limited number of trends in the city and region, and to ensure the Site Inventory represents a realistic buildout, the inventory primarily assumes a site buildout of up to 70 percent of the maximum allowed density, except where specific site conditions such as public ownership or developer interest exist. It should be noted that the analysis provided in this DEIR assumes a buildout of up to 100 percent of the maximum density, in order to provide a conservative analysis. The buildout analyzed throughout the DEIR is described further in Section 2.7, *Growth Projections.* The remainder of this section describes the Site Inventory and Housing Element Update as currently proposed.

Site selection ultimately resulted in the selection of the following site types:

- Single-family and multi-family residential
- Commercial
- Office conversions
- Churches
- Parking Lots
- Vacant sites

Seventy-three (73) sites were identified amongst these site types (refer to Figure 2-3 for the location of these sites). These sites are described further below based on their geographic area in the city.

DOWNTOWN DISTRICT AND OFFICE CONVERSIONS

Nine (9) sites (Sites 1 through 9) were identified in the Downtown District, which can accommodate a total of 149 housing units. Of these, 87 units would be affordable to lower-income households. These sites are primarily located along Lighthouse Avenue and Forest Avenue and are zoned as Downtown Commercial (C-D). These sites vary in size from 0.05 acre to 1.16 acres. As part of the project, the City would implement programs to promote the combination of small parcels in the Downtown District, including providing technical assistance to interested developers and property owners and ensuring a ministerial approval process for lot consolidations. In addition, the project would amend the Zoning Code to allow a maximum density of 45.0 dwelling units per acre (DU/ac) in the C-D zoning district, compared to the currently allowed maximum density based on the nearest General Plan residential land use, up to 30 DU/ac (ranges from 19.8 DU/ac to 29.0 DU/ac). . To account for partial redevelopment of these commercial sites, the Housing Element Update conservatively assumed each site would be developed to 80 percent of the maximum allowed density, except for sites owned by the City of Pacific Grove, for which 90 percent of the maximum allowed density is assumed.

Sixteen (16) sites with existing two-story commercial structures were identified for housing development (referred to as office conversion sites). These sites (Sites 58 through 73) have vacant or underutilized spaces on the second floor, and could accommodate a total of 83 housing units through second-story conversions. These sites are located primarily along Lighthouse Avenue and Grand Avenue and are zoned as Downtown Commercial (C-D), Multiple-Family Residential (R-3-P.G.R.), or Multiple-Family Residential (R-4), with a maximum density of 45.0 DU/ac for the C-D zone, 19.8 DU/ac for the R-3-P.G.R. zone, and 29.0 DU/ac for the R-4 zone. Housing sites in the Downtown District, including office conversions, are shown in Figure 2-6 and in Table 2-4.

Figure 2-6 Proposed Housing Sites Within and Near the Downtown District



Table 2-4 Downtown District and Office Conversion Sites

Site	Site Address	Current Zoning	Proposed Zoning	Current Land Use	Proposed Land Use	Coastal Zone or Historic Resources Inventory	Proposed Affordability
1	161 Fountain Ave; 148 15th St	C-D	C-D*	D	D	No	MI only
2	561 Lighthouse Ave; 210 and 214 Grand Ave	C-D	C-D*	D	D	No	AMI only
3	166 12th St	C-D	C-D*	D	D	No	AMI only
4	226 Forest Ave	C-D	C-D*	D	D	No	AMI only
5	168 Forest Ave	C-D	C-D*	D	D	No	AMI only
6	490 Lighthouse Ave	C-D	C-D*	D	D	No	AMI only
7	480 Lighthouse Ave	C-D	C-D*	D	D	No	AMI only
8	601 Lighthouse Ave	C-D	C-D*	D	D	No	LI only
9	525 and 531 Lighthouse Ave	C-D	C-D*	D	D	No	LI only
58	311 Forest Ave	C-D	C-D*	D	D	No	AMI only
59	209 Grand Ave	C-D	C-D*	D	D	HRI	AMI only
60	222 Grand Ave	C-D	C-D*	D	D	No	AMI only
61	581 Lighthouse Ave	C-D	C-D*	D	D	No	AMI only
62	205 17th St	C-D	C-D*	D	D	HRI	AMI only
63	208, 210 17th St	C-D	C-D*	D	D	No	AMI only
64	716 Lighthouse Ave	C-D	C-D*	D	D	HRI	AMI only
65	718 Lighthouse Ave	R-4	R-4	HDR 29.0	HDR 29.0	No	AMI only
66	604 Lighthouse Ave	C-D	C-D*	D	D	No	AMI only
67	650 Lighthouse Ave	C-D	C-D*	D	D	No	AMI only
68	541 Lighthouse Ave	C-D	C-D*	D	D	HRI	AMI only
69	588 and 590 Lighthouse Ave	C-D	C-D*	D	D	HRI (588 Lighthouse)	AMI only
70	575 Lighthouse Ave	C-D	C-D*	D	D	HRI	AMI only
71	562 Lighthouse Ave	C-D	C-D*	D	D	HRI	AMI only
72	146 12th St	R-3-PGR	R-3-PGR	HDR 19.8	HDR 19.8	HRI	AMI only
73	141 4th St	R-3-PGR	R-3-PGR	HDR 19.8	HDR 19.8	HRI	AMI only

Zone Districts: C-D = Commercial Downtown; R-4 = Multiple-Family Residential; R-3-PGR = Multiple Family Residential, Pacific Grove Retreat

Land Use Designations: D = Downtown Commercial; HDR = High Density Residential; * = indicates a modification to the land use or zoning designation to increase density

HRI = Historic Resources Inventory

Affordability Options: MI = Moderate Income; AMI = Above Moderate Income; LI = Low Income

CENTRAL-EARDLEY COMMERCIAL DISTRICT

Ten (10) sites (Sites 10 through 19) were identified in the Central-Eardley Commercial (CEC) District, and these sites would accommodate a total of 66 housing units. These sites are located along Central Avenue in the northeastern portion of the city and are zoned as Light Commercial (C-1), Heavy Commercial (C-2), and Multiple-Family Residential (R-4). CEC sites vary in size from 0.09 acre to 0.85 acre. Currently, maximum density for parcels zoned C-1 or C-2 in the CEC District corresponds to the maximum density of the nearest residential land use category; the CEC District is adjacent to the High Density Residential (up to 19.8 DU/ac) land use designation, which allows for residential development up to a maximum density of 19.8 DU/ac. As part of the project, the City would amend the Zoning Code to allow a maximum density of 30 DU/ac for parcels zoned C-1 or C-2 outside the Coastal Zone in the CEC District, compared to the currently allowed maximum density of 19.8 DU/ac. Parcels zoned C-1 or C-2 within the Coastal Zone would not be upzoned and would remain at their current density. To account for partial redevelopment of these commercial sites, the Housing Element Update conservatively assumed each site would be developed to 70 percent of the maximum allowed density. Housing sites in the CEC District are shown in Figure 2-7 and Table 2-5.

Table 2-5 Central-Eardley Commercial District Sites

Site	Site Address	Current Zoning	Proposed Zoning	Current Land Use	Proposed Land Use	Coastal Zone or Historic Resources Inventory	Proposed Affordability
10	168 Central Ave	C-1	C-1	CEC	CEC	CZ	AMI only
11	160 Central Ave	C-1/C-2	C-1/C-2	CEC	CEC	CZ	AMI only
12	100 and 120 Central Ave	C-1	C-1	CEC	CEC	CZ	AMI only
13	127 Central Ave	C-1	C-1*	CEC	CEC	No	AMI only
14	105 and 109 Central Ave; Evans Ave	C-1/R-4	C-1/R-4*	CEC	CEC	No	AMI only
15	167 Central Ave	C-1	C-1*	CEC	CEC	No	AMI only
16	155 and 159 Central Ave	C-1/R-4	C-1/R-4*	CEC	CEC	No	AMI only
17	173 Central Ave	C-1/R-4	C-1/R-4*	CEC	CEC	No	AMI only
18	95 Central Ave	C-1	C-1*	CEC	CEC	No	LI and AMI
19	119 Dewey Ave	C-2	C-2	CEC	CEC	CZ	AMI only

Zone Districts: C-1 = Light Commercial; C-2 = Heavy Commercial; R-4 = Multiple-Family Residential

Land Use Designations: CEC = Central-Eardley Commercial; * = indicates a modification to the land use designation or zoning to increase density

CZ = Coastal Zone

Affordability Options: AMI = Above Moderate Income; LI = Low Income

Figure 2-7 Proposed Housing Sites Within and Near the Central-Eardley Commercial District



FOREST HILL COMMERCIAL DISTRICT

Eighteen (18) sites (Sites 20 through 37) were identified in the Forest Hill Commercial District, and these sites would accommodate 347 housing units, 256 of which would be affordable to lower-income households. These sites are located along Forest Avenue in the southeastern portion of the city and vary from 0.16 acre to 2.46 acres in size. These sites are currently developed with commercial and residential uses. All the Forest Hill sites are currently zoned as Forest Hill Commercial (C-FH). Currently, maximum density for the C-FH zone corresponds to the maximum density of the nearest residential land use category; the CFH District is adjacent to the High Density Residential (up to 29.0 DU/ac) and Medium Density Residential (up to 7.0 DU/ac) land use designation, which allows for residential development up to a maximum density of 29.0 and 7.0 DU/ac, respectively. The project would amend the Zoning Code to allow a maximum density of 45 DU/ac in the C-FH zoning district, compared to the currently allowed maximum density of 7.0 to 29.0 DU/ac. To account for partial redevelopment of these commercial sites, the Housing Element Update conservatively assumed each site would be developed to 70 percent of the maximum allowed density of 45 DU/ac. Housing sites in the Forest Hill District are shown in Figure 2-8 and Table 2-6.

Table 2-6 Forest Hill Commercial District Sites

Site	Site Address	Current Zoning	Proposed Zoning	Current Land Use	Proposed Land Use	Coastal Zone or Historic Resources Inventory	Proposed Affordability
20	2749 Forest Hill Blvd	C-FH	C-FH*	C-FH	C-FH	No	LI only
21	1146 and 1152 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	LI only
22	1125, 1129, 1133, and 1137 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	LI and AMI
23	1107, 1117, and 1123 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	AMI only
24	1141 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	AMI only
25	1149 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	AMI only
26	1157 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	LI only
27	1193 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	LI only
28	1199 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	AMI only
29	1124 and 1140 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	LI only
30	1160 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	LI only
31	1180 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	LI and MI
32	1201 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	AMI only
33	1219 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	LI only
34	1247 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	AMI only
35	1225 Forest Ave; Stuart Ave	C-FH	C-FH*	C-FH	C-FH	No	AMI only
36	1224 Forest Ave	C-FH	C-FH*	C-FH	C-FH	No	AMI only
37	Ransford Ave	C-FH	C-FH*	C-FH	C-FH	No	AMI only

Zone Districts and Land Use Designations: C-FH = Forest Hill Commercial; * = indicates a modification to the land use or zoning designation to increase density

Affordability Options: LI = Low Income; AMI = Above Moderate Income; MI = Moderate Income

Figure 2-8 Proposed Housing Sites Within the Forest Hill Commercial District



DENNETT, SINEX, AND GROVE ACRE NEIGHBORHOOD

Four (4) sites (Sites 38 through 41) were identified in the Dennett, Sinex, and Grove Acre Neighborhood, and these sites would accommodate 67 housing units, 59 of which would be affordable to lower-income households. These sites are located between Dennett Street, Sinex Avenue, and Grove Acre Avenue in the western portion of the city and vary from 0.51 acre to 1.52 acres in size. These sites are currently developed with single-family residential uses. All the Dennett, Sinex, and Grove Acre Neighborhood sites are currently zoned as R-2-B-3. The project would amend the Zoning Code to rezone the Dennett Street, Sinex Avenue, and Grove Acre Avenue Neighborhood from R-2-B-3 to R-3 and amend the General Plan to allow a maximum density of 29.0 DU/ac in the Dennett, Sinex, and Grove Acre Neighborhood, compared to the currently allowed maximum density of 8.7 DU/ac. The Housing Element Update conservatively assumed each site would be developed to 70 percent of the maximum allowed density of 29.0 DU/ac. Housing sites in the Dennett, Sinex, and Grove Acre Neighborhood are shown in Figure 2-9 and Table 2-7.

Table 2-7 Dennet, Sinex, and Grove Acre Neighborhood Sites

Site	Site Address	Current Zoning	Proposed Zoning	Current Land Use	Proposed Land Use	Coastal Zone or Historic Resources Inventory	Proposed Affordability
38	1120 and 1114 Sinex Ave	R-2-B-3	R-3	MDR 8.7	HDR 29.0	No	LI and MI
39	611, 637, and 659 Dennett St	R-2-B-3	R-3	MDR 8.7	HDR 29.0	No	LI only
40	710 and 720 Grove Acre Ave	R-2-B-3	R-3	MDR 8.7	HDR 29.0	No	LI and MI
41	1126 Sinex Ave and 679 Dennett St	R-2-B-3	R-3	MDR 8.7	HDR 29.0	No	LI and MI

Zone Districts: R-2-B-3 = Duplex- Residential; R-3 = Multiple-Family Residential

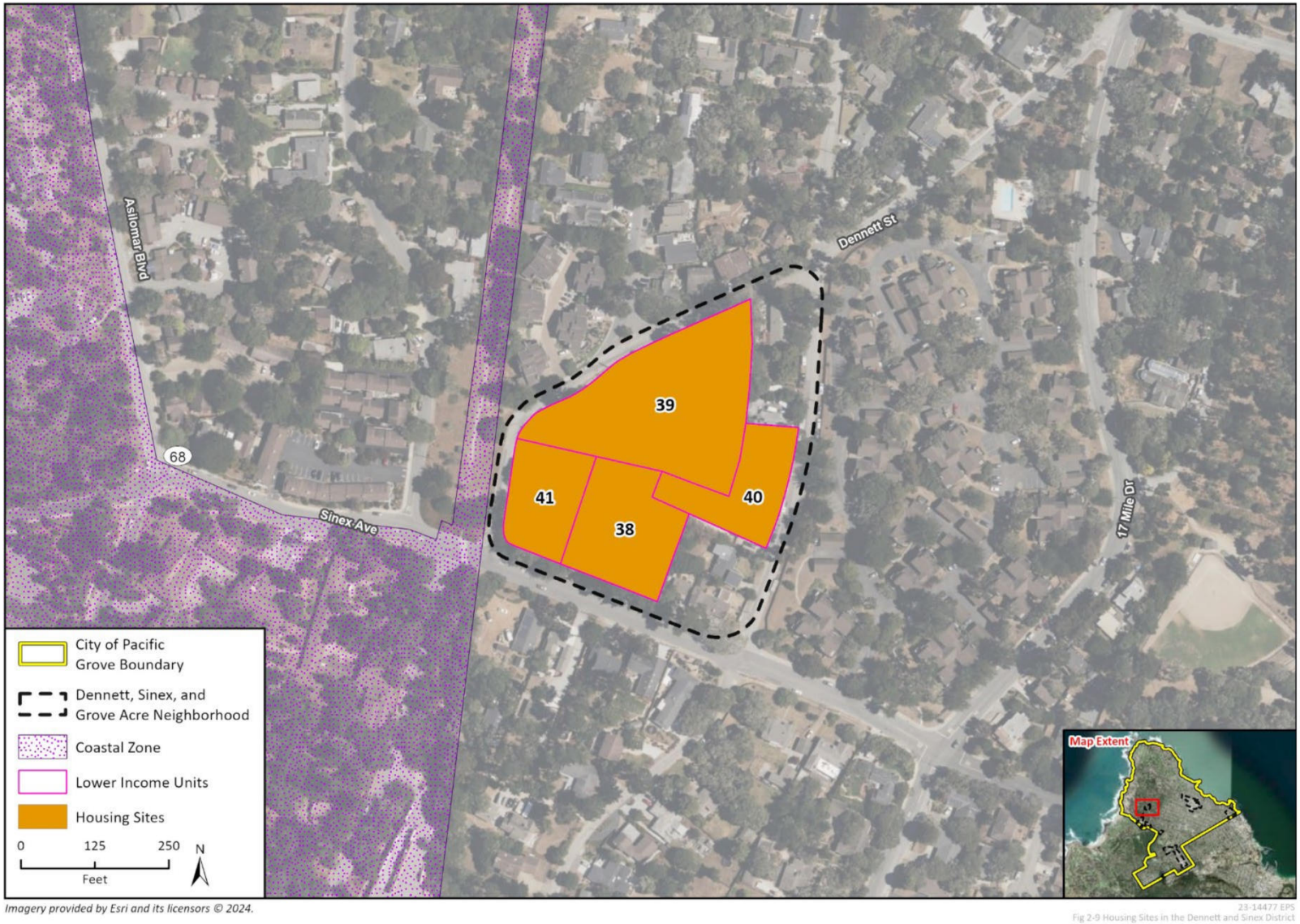
Land Use Designations: MDR = Medium Density Residential; HDR = High Density Residential

Affordability Options: LI = Low Income; MI = Moderate Income; AMI = Above Moderate Income

OTHER AREAS

Sixteen (16) sites were identified on vacant and underutilized parcels in other parts of the city, on parcels with residential and commercial zoning. These sites (Sites 42 through 57) would accommodate 287 housing units, of which 149 units would be affordable to lower income households. Four of these sites (Sites 48, 49, 55, and 57) would be upzoned to accommodate housing development. The project would amend the Zoning Code to allow a maximum density of 30 DU/ac in the C-1 and C-2 zoning district located outside the Coastal Zone, compared to the current allowed maximum density based on the nearest General Plan residential land use, up to 30 DU/ac. Parcels zoned C-1 or C-2 within the Coastal Zone would not be upzoned and would remain at their current density. The Housing Element Update conservatively assumes each upzoned site would be developed to 70 percent of the maximum allowed density of 30 DU/ac. One site (Site 50) would be rezoned from Restricted Duplex Residential District (R-2) to Multiple Family Residential (R-3) to accommodate housing development. The project would amend the General Plan to change the land use designation of Site 50 from Medium Density Residential 12.1 to High Density Residential 29.0. The Housing Element Update conservatively assumes the rezoned site would be developed to 70 percent of the maximum allowed density of 29.0 DU/ac, consistent with the capacity assumptions of other residentially zoned sites in the Site Inventory.

Figure 2-9 Proposed Housing Sites Within the Dennett, Sinex, and Grove Acre Neighborhood



The sites in the other areas of the city are located throughout the city and most sites vary in size from 0.04 acre to 2.91 acres, with one site (Site 50) encompassing 5.76 acres. Housing sites in other areas of the city are shown in Figure 2-10 and Table 2-8.

Table 2-8 Other Area Sites

Site	Site Address	Current Zoning	Proposed Zoning	Current Land Use	Proposed Land Use	Coastal Zone or Historic Resources Inventory	Proposed Affordability
42	503 Chestnut St	R-1	R-1	MDR 12.1	MDR 12.1	No	AMI only
43	506 Walnut St	R-1	R-1	MDR 12.1	MDR 12.1	No	AMI only
44	514 6th St	R-1	R-1	MDR 12.1	MDR 12.1	No	AMI only
45	411 Grand Ave	R-4	R-4	HDR 29.0	HDR 29.0	No	AMI only
46	418 8th St	R-4	R-4	MDR 12.1	MDR 12.1	No	AMI only
47	304 Grove Acre Ave	R-1-B-3	R-1-B-3	LDR 4.4	LDR 4.4	No	AMI only
48	2184 Sunset Dr	C-2	C-2*	SSC	SSC	No	LI only
49	17 Mile Dr	C-2	C-2*	SSC	SSC	No	LI and AMI
50	915 Sunset Dr	R-2	R-3	MDR 17.4	HDR 29.0	No	LI, MI, AMI
51	522 Fountain Ave	R-1	R-1	MDR 10.9	MDR 10.9	No	AMI only
52	136 8th St	R-3-PGR	R-3-PGR	HDR 19.8	HDR 19.8	No	AMI only
53	1030 Lighthouse Ave	R-3-M	R-3-M	HDR 29.0	HDR 29.0	HRI	AMI only
54	305 Fountain Ave	R-4	R-4	HDR 29.0	HDR 29.0	No	AMI only
55	801 Sunset Dr	C-1	C-1*	NC	NC	No	LI only
56	970 Sunset Dr	C-2	C-2	SSC	SSC	CZ	MI only
57	1236 Presidio Blvd	C-1	C-1*	PAC	PAC	No	MI and AMI

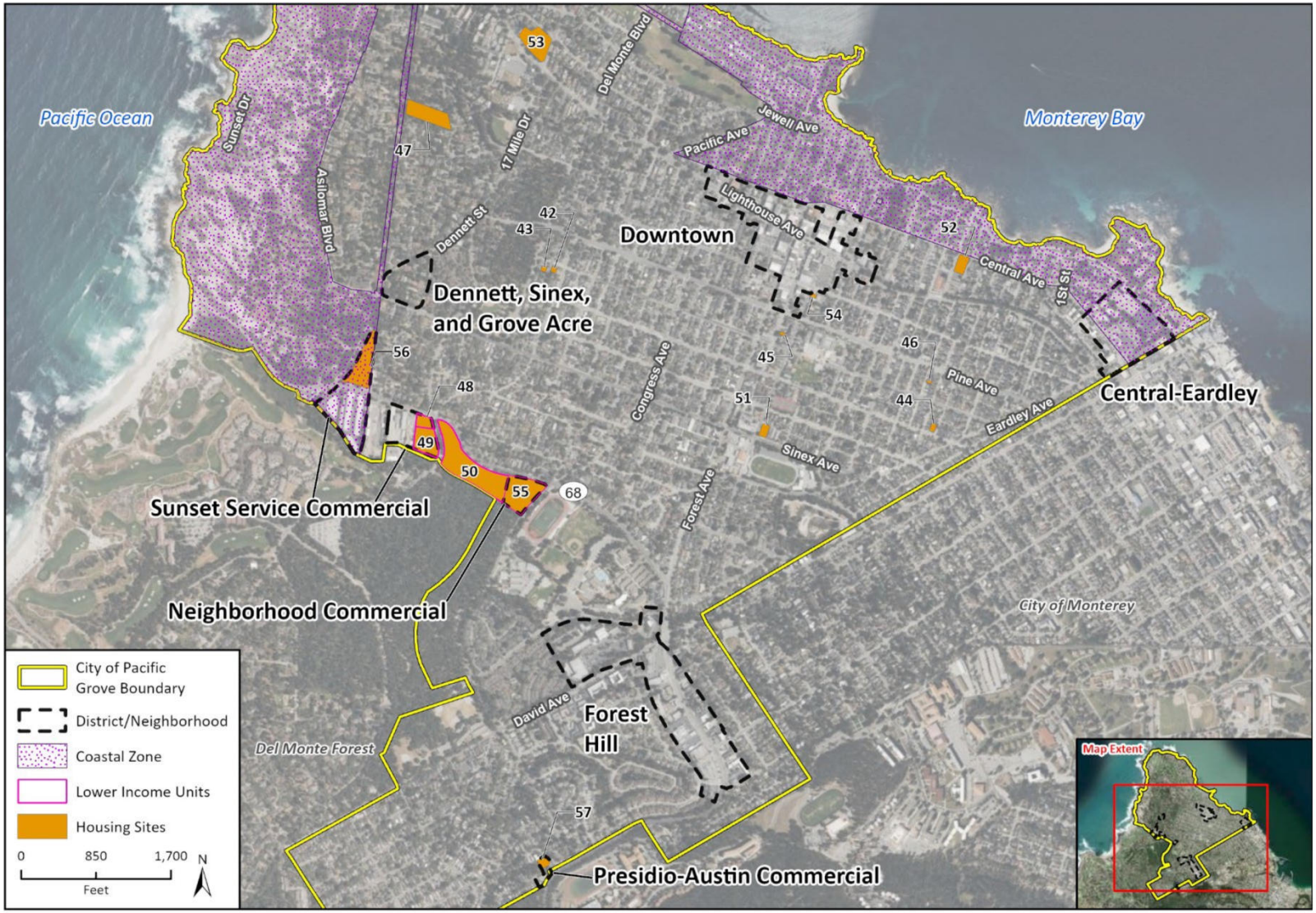
Zone Districts: R-1, R-1-B-3 = Single-Family Residential; R-2 = Duplex Residential; R-3, R-3-M = Multiple-Family Residential; R-3-PGR = Multiple-Family Residential, Pacific Grove Retreat; R-4 = Multiple Family Residential/Professional Office District; C-1 = Light Commercial; C-2 = Heavy Commercial, * = indicates a modification to the land use or zoning designation to increase density

Land Use Designations: LDR = Low Density Residential; MDR = Medium Density Residential; HDR = High Density Residential; SSC = Sunset Service Commercial; NC = Neighborhood Commercial; PAC = Presidio-Austin Commercial

CZ = Coastal Zone; HRI = Historic Resources Inventory

Affordability Options: LI = Low Income; MI = Moderate Income; AMI = Above Moderate Income

Figure 2-10 Proposed Housing Sites in Other Areas



2.6.2 Additional Parcels for Environmental Analysis

To allow for flexibility and ensure a thorough environmental analysis, 15 additional parcel groups are analyzed in this DEIR (referred to herein as "additional parcels"), although actions related to these parcels are not proposed at this time, and may occur at a later date at the City's discretion. This approach is meant to accommodate potential future modifications to the Site Inventory to include some or all of the 15 additional parcels. The 15 additional parcels are located on vacant and underutilized parcels throughout the city, including parcels with Single-Family Residential (R-1 and R-1-B-3), C-D, C-FH, and I zoning that are not included in the Site Inventory but are included in this DEIR.[2] These additional parcels have the potential to accommodate additional housing development under their current and proposed land use and zoning designations. These additional parcels are included in the DEIR analysis to ensure that, in the event that one or more of the housing sites is removed from the Housing Element at a later date (which may occur as a result of future comments from HCD) or in the event that one or more of the housing sites is developed at a lower capacity than assumed in the Housing Element, the City may take action to add some or all of the 15 additional parcels into the Site Inventory. The 15 additional parcels included in the DEIR analysis but not the Site Inventory are shown in Figure 2-11 and Table 2-9, and the buildout associated with these additional parcels is reflected in Section 2.7, *Growth Projections*.

Table 2-9 Additional Parcels for Environmental Analysis

Site	Site Address	Current Zoning	Proposed Zoning	Current Land Use	Proposed Land Use	Coastal Zone or Historic Resources Inventory	Proposed Affordability
A1	420 Crocker Ave	R-1-B-3	R-1-B-3	LDR 4.4	LDR 4.4	No	AMI only
A2	17th St and Junipero Ave	R-1	R-1	MDR 12.1	MDR 12.1	No	AMI only
A3	Buena Vista Ave (Del Monte)	R-1	R-1	MDR 9.7	MDR 9.7	No	AMI only
A4	Buena Vista Ave (Del Monte)	R-1	R-1	MDR 9.7	MDR 9.7	No	AMI only
A5	1114 Funston Ave	R-1	R-1	MDR 9.7	MDR 9.7	No	AMI only
A6	1112 Funston Ave	R-1	R-1	MDR 9.7	MDR 9.7	No	AMI only
A7	1051 Benito Ave	R-1	R-1	MDR 9.7	MDR 9.7	No	AMI only
A8	1040 Benito Ave	R-1	R-1	MDR 9.7	MDR 9.7	No	AMI only
A9	1014 Benito Ave	R-1	R-1	MDR 9.7	MDR 9.7	No	AMI only
A10	2160 Sunset	I	I*	SSC	SSC	No	LI and MI
A11	200 Country Club Gate	C-FH	C-FH*	CCG	CCG	No	AMI only
A12	701 Lighthouse Ave	C-D	C-D*	D	D	No	MI and AMI
A13	685 and 687 Lighthouse Ave	C-D	C-D*	D	D	No	MI and AMI
A14	617 Lighthouse Ave	C-D	C-D*	D	D	No	MI and AMI
A15	318 Grand Ave	C-D	C-D*	D	D	No	MI and AMI

Zone Districts: R-1, R-1-B-3 = Single-Family Residential; C-D = Downtown Commercial; C-FH = Forest Hill Commercial; I = Industrial, * = indicates a modification to the land use or zoning designation to increase density, which may occur at a later date

Land Use Designations: MDR = Medium Density Residential; SSCH = Sunset Service Commercial; CCG = Country Club Gate Shopping Center; D = Downtown Commercial

Affordability Options: LI = Low Income; MI = Moderate Income; AMI = Above Moderate Income

[2] The C-D and C-FH zoned sites would be modified by the proposed upzoning of C-D and C-FH zoning districts under the Housing Element; however, the specific sites identified in these zones as "additional parcels" are not currently included in the Site Inventory.

Figure 2-11 Additional Parcels for Environmental Analysis (Not Included in the Housing Element Site Inventory)



2.6.3 Zoning Amendments

The following section describes the amendments to the City's Zoning Code that would occur under the proposed project.

Upzoning and Rezoning

When a local jurisdiction cannot demonstrate that sufficient vacant or underutilized sites exist with the appropriate zoning to adequately meet its RHNA, a "rezoning program" must be put into place. A rezoning program ensures that there are enough sites with sufficient densities to address the housing need identified through the RHNA. The project includes rezoning Sites 38 through 41 and Site 50 (Housing Sites) and increasing the maximum allowed development density (or "upzoning") of all parcels in the city zoned as C-D, C-FH, C-1, and C-2 (Zoning Districts proposed for upzoning) that are outside the Coastal Zone to allow residential development to accommodate the RHNA. While some housing sites in the Site Inventory are zoned as C-D, C-FH, C-1, C-2, and R-2-B-3, the zoning amendments would apply to all parcels in the C-D, C-FH, C-1, C-2, and R-2-B-3 Zoning Districts. Accordingly, the project would increase the maximum development density of other parcels throughout the city with the same base zoning (C-D, C-FH, C-1, C-2, and R-2-B-3), not only housing sites. These zoning amendments are a component of the proposed project, and their direct or indirect impacts on the environment are analyzed in this DEIR.

Additionally, the proposed project also includes the additional parcels, which are not currently included in the Site Inventory (refer to Section 2.6.2 for further information). Additional parcels zoned I and located outside of the Coastal Zone (including Site A10) would potentially be upzoned to allow for a greater housing unit development density.

Table 2-10 summarizes the sites that would be rezoned as part of the project, and sites that would be allowed to develop at an increased density as a result of the proposed Zoning Code amendments (upzoned).

Table 2-10 Summary of Zoning Changes

Site(s)	Current Zoning	Zone Change?	Current Maximum Density (DU/ac)	Proposed Maximum Density (DU/ac)
Housing Sites				
1-9, 58-64, 66-71	C-D	No	Equal to the nearest General Plan residential land use category, up to 30.0	45
10-19	C-1, C-1/R-4, C-1/C-2, C-2	No	Equal to the nearest General Plan residential land use category, up to 30.0	30
20-37	C-FH	No	Equal to the nearest General Plan residential land use category, up to 30.0	45
38-41	R-2-B-3	**Yes**, R-3	8.7	29
48-49, 55, 57	C-1, C-2	No	Equal to the nearest General Plan residential land use category, up to 30.0	30
50	R-2	**Yes**, R-3	17.4	29
Zoning Districts Proposed for Upzoning				
C-D Zone	C-D	No	Equal to the nearest General Plan residential land use category, up to 30.0	45
C-FH Zone	C-FH	No	Equal to the nearest General Plan residential land use category, up to 30.0	45

Site(s)	Current Zoning	Zone Change?	Current Maximum Density (DU/ac)	Proposed Maximum Density (DU/ac)
C-1 and C-2 Zones (outside of the Coastal Zone)	C-1, C-2	No	Equal to the nearest General Plan residential land use category, up to 30.0	30
R-2-B-3 Zone	R-2-B-3	**Yes**, R-3	8.7	29
Additional Parcels Not in the Site Inventory				
A10 and sites zoned I (outside of the Coastal Zone)[1]	I	No	Equal to the nearest General Plan residential land use category, up to 30.0	30
A11	C-FH	No	Equal to the nearest General Plan residential land use category, up to 30.0	45
A12-A15	C-D	No	Equal to the nearest General Plan residential land use category, up to 30.0	45

See the Housing Element for the full list of housing sites including addresses and General Plan land use designation.

Zoning codes: C-D = Downtown Commercial; C-1 = Light Commercial; C-2 = Heavy Commercial; C-FH = Forest Hill Commercial; R-2-B-3 = Duplex Residential; R-3 = Multiple Family Residential; R-2 = Duplex Residential District; I = Restricted Industrial

DU/ac = dwelling units per acre

[1] There are two total I-zoned parcels located outside of the Coastal Zone, one of which is Site A10. The other parcel (located at 2136 Sunset Drive) is not anticipated to redevelop based on the existing development on the site, but would also potentially be upzoned.

Source: City of Pacific Grove 2024

Figure 2-12 shows the housing sites that are proposed to be rezoned as part of the project. Upzoning areas would include sites in the C-D, C-FH, C-1, C-2, I, and R-2-B-3 Zoning Districts, located outside of the Coastal Zone, as shown in Figure 2-12. Section 2.7, *Growth Projections*, includes an estimate of potential buildout associated with the proposed changes to the C-D, C-FH, C-1, C-2, I, and R-2-B-3 Zoning Districts, as analyzed in this DEIR.

Multi-Family Residential Objective Design Standards

The project would also include amending the City's Zoning Code to include objective design standards for multi-family residential and mixed-use development. Pursuant to SB 35, the Streamlined Affordable Housing Act (2016), local jurisdictions are required to approve qualified housing projects based on objective regulatory standards. Additionally, SB 330, the Housing Crisis Act (2019), prohibits imposing or enforcing new design standards established on or after January 1, 2020, that are not objective.

Objective design standards, as opposed to subjective standards, are defined under state law as "standards that involve no personal or subjective judgement by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official prior to submittal" (California Government Code Sections 65913.4 and 66300). An objective design standard can be verified by referencing established criteria. An example of an objective design standard is "primary colors shall be used on at least 60 percent of the building surface." This is different than a subjective design standard, which could be "colors of the building surface shall be consistent with existing development." The latter, subjective design standard would require judgement from a public official, whereas the use of primary colors on the building surface can be objectively verified by both the public official and the development applicant.

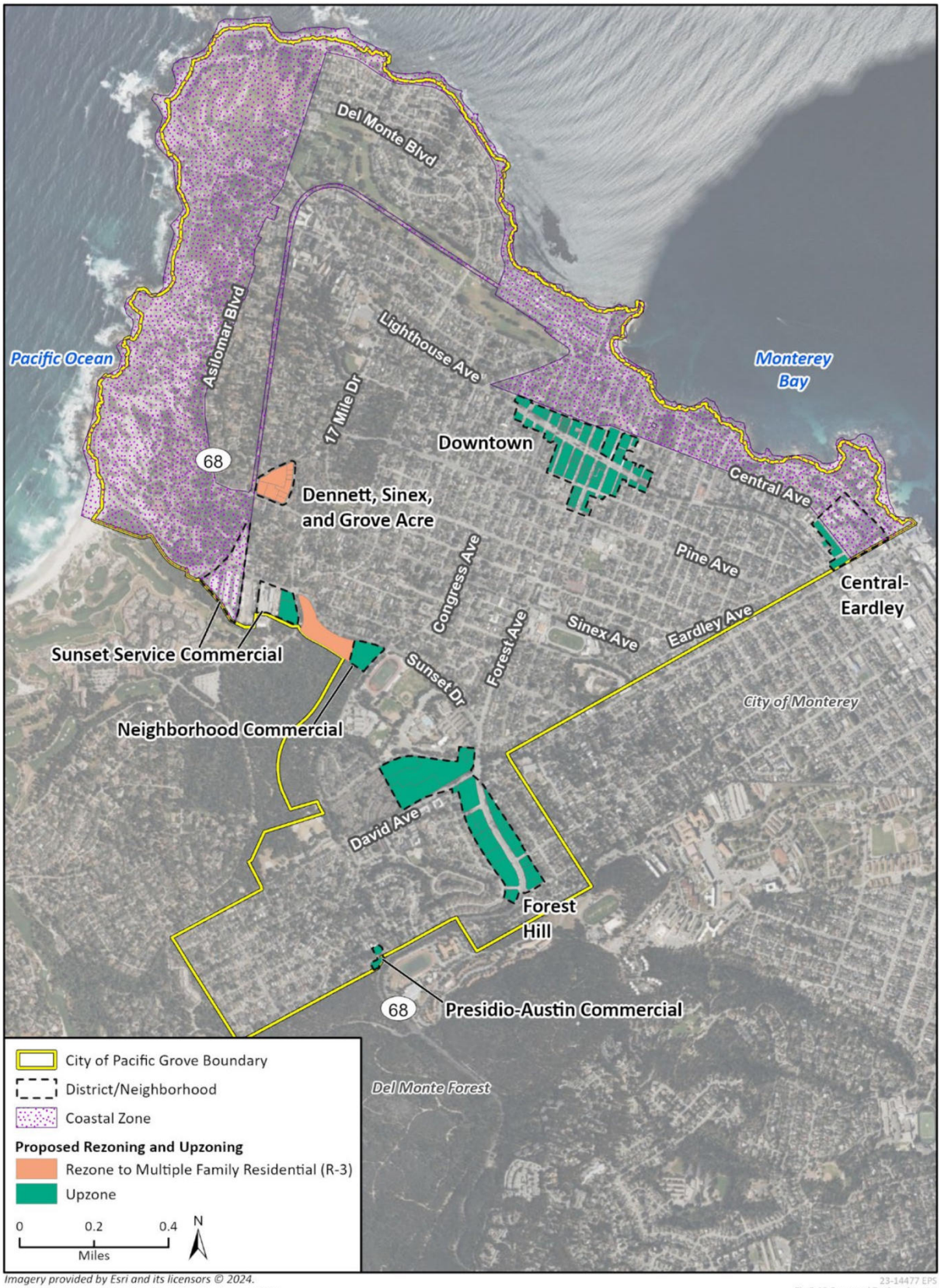
The City of Pacific Grove will develop objective design standards for multi-family residential and mixed-use development. The project would include amending the City's Zoning Code to include these standards. The proposed objective design standards would include revisions to the maximum allowable height and site coverage allowance of several zoning districts, revisions to the minimum open space and yard size requirements of several zoning districts, and revisions to residential and commercial parking dimensions and parking requirements. The creation of objective design standards does not facilitate specific development projects; rather, the standards would apply to future multi-family residential and mixed-use development in Pacific Grove.

Other Changes to the Zoning Code

The project would include amending the City's Zoning Code to facilitate implementation of housing programs included in the 6th Cycle Housing Element that support the development of affordable housing, remove governmental constraints to the development of housing, and ensure the City's zoning and development standards are in compliance with state law. The project would include the following zoning amendments:

- Provide for by-right approval for housing projects that include at least 20 percent of units for lower income households on sites previously identified to meet the 4th and 5th cycle lower-income RHNA, consistent with AB 1397.
- Establish land use policies and development standards to facilitate the redevelopment of shopping centers.
- Establish development incentives to promote the development of affordable housing on large lots.
- Maintain consistency between the City's ADU polices and state ADU laws, including AB 2533, SB 1211, and SB 1077.
- Revise development standards, including parking and height regulations, in relation to higher density housing.
- Establish written procedures for the processing of SB 35 projects.
- Revise allowed uses in specific residential, commercial, and industrial zones to allow single-room occupancy (SRO) housing, supportive housing, emergency shelters, Low Barrier Navigation Centers, employee housing, and residential care facilities as required by state law and establish development standards for these uses that are consistent with state requirements.
- Remove subjective language and/or establish objective findings of approval for use permits and reasonable accommodation requests.
- Establish a local density bonus program that offers incentives for affordable housing development beyond those required by the state.

Figure 2-12 Proposed Upzoning and Rezoning



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Additional data provided by City of Pacific Grove, 2024.

23-14477 EPS
Fig 2-12 Proposed Zoning changes

2.6.4 General Plan Amendments

The proposed project includes amendments to the following elements of the General Plan, which are necessary as a result of the preparation of the 6th Cycle Housing Element. These amendments are not comprehensive updates to the elements, but rather, are revisions specifically to ensure compatibility with the Housing Element Update, as well as revisions for compliance with state laws.

Land Use Element and Land Use Map Amendments

The Land Use Element, adopted as part of the City's 1994 General Plan, is a guide for the City as it considers future development within Pacific Grove. It designates the distribution and general location of land uses, such as residential, retail, institutional, industrial, open space, recreation, and public uses. The Land Use Element also addresses the permitted density and intensity of the various land use designations as reflected on the City's General Plan Land Use Map.

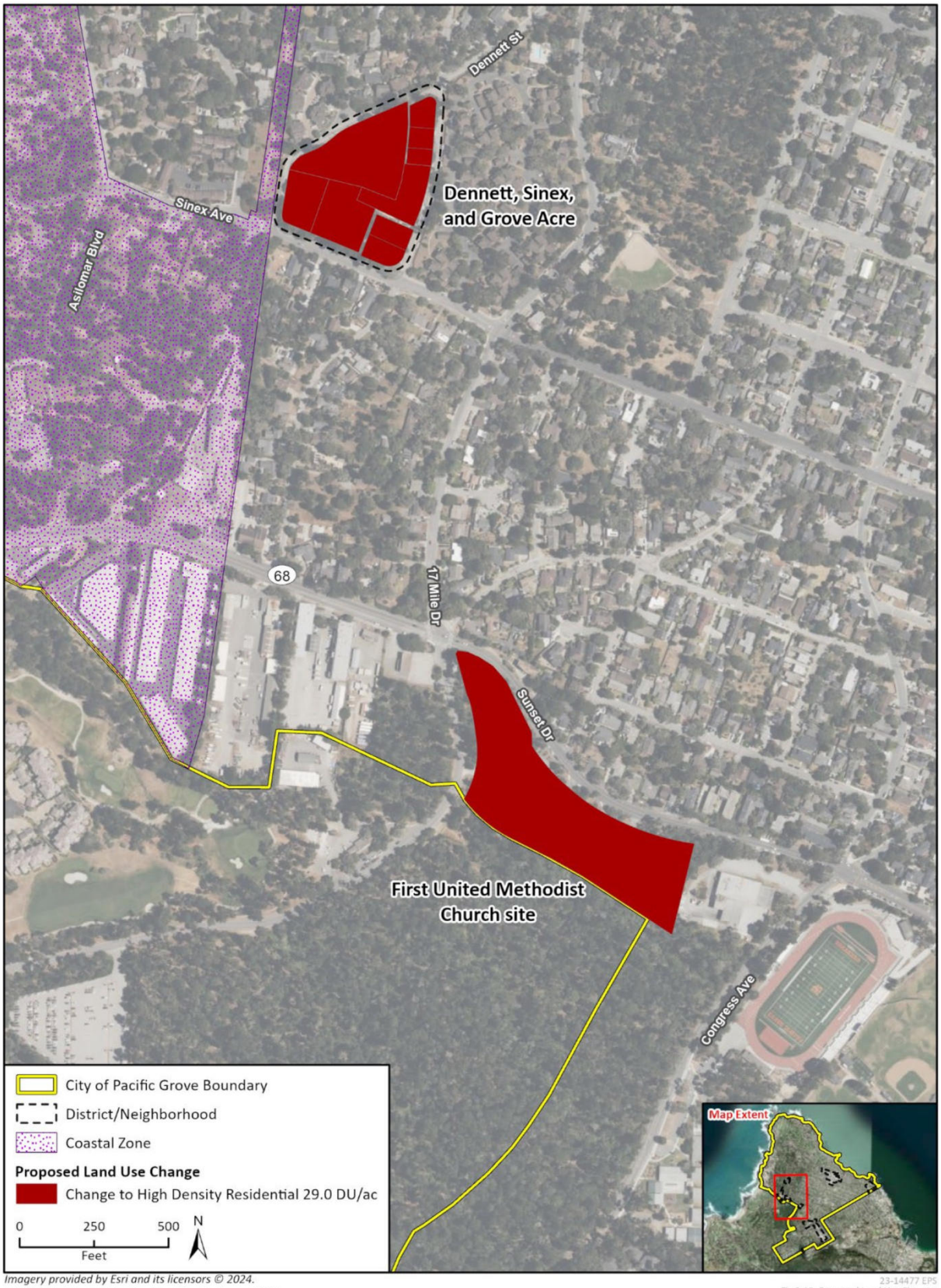
Proposed updates to the Land Use Element would include:

- Revisions to the Downtown (D), Central-Eardley Commercial (CEC), Forest Hill Commercial (C-FH), Sunset Service Commercial (SSC), Visitor Commercial (VC), Neighborhood Commercial (NC), and Presidio-Austin Commercial (PAC) General Plan land use designations to increase density, consistent with zoning amendments and the Housing Element Update described in Sections 2.6.3 and 2.6.1, respectively.
- Revisions to the General Plan Land Use Map to reflect changes to the land use designation of Sites 38 to 41 (Dennett, Sinex, and Grove Acre Neighborhood) and Site 50, which would change to High Density Residential 29.0, consistent with zoning amendments and the Housing Element Update described in Sections 2.6.3 and 2.6.1, respectively
- Revisions to policies of the Land Use Element to enable the implementation of and ensure consistency with the Housing Element Update described in Section 2.6.1.
- Revisions to text and tables discussing land use patterns and land use by area.
- Revisions to buildout analysis provided in the Land Use Element to reflect existing housing units.[3]

Proposed revisions to the City's Land Use Element are shown in Appendix B. Amendments to the Land Use Element would not facilitate specific development projects; rather, the amendments would enable the implementation of and ensure consistency with and implementation of the Housing Element Update. Figure 2-13 shows the sites that are proposed to have their General Plan land use designations changed. Section 2.7, *Growth Projections*, includes an estimate of potential buildout associated with the proposed changes to the C-D, C-FH, SSC, NC, PAC General Plan land use designations and Dennett, Sinex, and Grove Acre Neighborhood, as analyzed in this DEIR.

[3] While the project would involve revisions to the number of housing units included in the buildout analysis presented in the Land Use Element, the project would not alter the overall buildout assumptions of the Land Use Element or General Plan.

Figure 2-13 Sites with Proposed Changes to the General Plan Land Use Designations



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Additional data provided by City of Pacific Grove, 2024.

23-14477 EPS
Fig 2-13_Proposed Land Use Changes

Health and Safety Element Amendments

The City's Health and Safety Element, adopted as part of the 1994 General Plan, inventories and assesses major hazards that may affect Pacific Grove, including seismic and geologic hazards, erosion, fire, flooding, and noise. The Health and Safety Element includes policies and programs that intend to minimize risks associated with identified hazards and address the city's emergency response services (fire and police departments). As described in Section 2.8.2, Health and Safety Element, AB 747, SB 99, and SB 379 have mandated the inclusion of additional assessments and measures associated with emergency evacuation and climate change, including identification of emergency evacuation routes and capacity and preparation of a climate change vulnerability assessment. The proposed updates to the City's Health and Safety Element address the requirements of these bills.

Proposed updates to the Health and Safety Element would include:

- Updated background information and maps to reflect existing conditions.
- Identification of evacuation routes and capacity pursuant to AB 747 and SB 99.
- Inclusion of a climate change vulnerability assessment pursuant to SB 379.
- Updated and revised policies pertaining to climate change, fire hazards, flooding, and emergency response and preparedness.

Proposed revisions to the City's Health and Safety Element are shown in Appendix C. At the time of preparation of this DEIR, the proposed revisions to the Health and Safety Element have not yet been finalized. Final revisions are subject to review and approval by the California Board of Forestry and subsequent adoption by the City of Pacific Grove. This process is anticipated to be completed prior to certification and adoption of the Final EIR. Amendments to the Health and Safety Element would not facilitate specific development projects; rather, the amendments would include the assessment of evacuation routes and capacity and a climate change vulnerability assessment to comply with state law. The amendments would support future City planning efforts and would continue to minimize risks associated with identified hazards.

2.7 Growth Projections

As described in Section 2.6.1, *Housing Element Update,* the project in and of itself does not develop housing – it is a plan to provide for the possibility of housing, supported by consistent zoning standards. It is assumed that not all housing would realistically be built, based on previous development history in Pacific Grove, as housing development is mainly accomplished by the private sector and depends upon factors the City does not control, including financial resources, market trends, and other factors. However, for the purposes of this CEQA analysis, this program-level DEIR analyzes all the possible potential growth facilitated by the project.

As shown in Table 2-11, this DEIR will analyze a net increase of 2,335 new housing units and 292,578 commercial square feet.[4] As described in Section 2.6.1, *Housing Element Update,* the Site Inventory represents a "realistic" buildout, primarily assuming site residential buildout of up to 70 percent of

[4] The proposed upzoning described in Section 2.6.3 would increase residential density allowable on all C-D, C-FH, C-1, C-2, I, or R-2-B-3 zoned parcels; allowable commercial density would not increase. However, these parcels are not fully built out under current conditions, meaning additional commercial development could occur. Should these sites be redeveloped, it is possible that commercial square footage could also increase up to the maximum currently allowed. As such, to provide a comprehensive and conservative analysis, the EIR assumes full buildout that could occur on these parcels.

the maximum allowable density, except where specific conditions exist. In contrast, the growth projections provided in Table 2-11 and analyzed throughout this DEIR assume a residential buildout of up to 100 percent of the maximum density. Growth projections analyzed in this DEIR reflect varying levels of commercial buildout based on recent market and redevelopment trends in the city and region. This approach allows for a more conservative and comprehensive analysis. As such, the DEIR will use these figures to calculate and determine potential environmental impacts. In addition, because the DEIR assumes a residential buildout of up to 100 percent of the maximum density, the DEIR evaluates additional housing units facilitated by Housing Element programs beyond those needed to meet the RHNA, including units facilitated by Program 10, Enhanced Housing Mobility Options, and Program 21, Affirmatively Furthering Fair Housing. Programs 10 and 21 have objectives to facilitate the development of 75 and 25 additional residential units, respectively, not included in units needed to meet the RHNA. While the exact quantity and location of units facilitated by Program 10 and Program 21 are not currently known, the development of additional housing units is analyzed in this DEIR because of the conservative maximum buildout assumptions.

Table 2-11 Growth Potential Analyzed in the DEIR

Characteristic	Existing[1]	Anticipated Buildout Facilitated by the Project[2]	Net Increase (Project Minus Existing)[3]
Housing Units	160 units	2,495 units	2,335 units
Commercial Area	988,673 square feet	1,281,251 square feet	292,578 square feet
Population	14,966 people	19,916 people[4]	4,950 people[4]

[1] Summary of baseline conditions, including the number of housing units and commercial square footage currently within the housing sites and upzoning areas, and Pacific Grove's current (2024) population.

[2] The anticipated increase in residential and commercial development that could be facilitated by the rezoning and upzoning under the proposed project. Refer to Appendix D for specific buildout assumptions.

[3] The net increase in residential development that could be facilitated by the rezoning and upzoning and net increase in commercial development that could be facilitated by redevelopment (gross increase minus existing housing units and commercial area).

[4] Population was calculated using an average of 2.12 persons per household (California Department of Finance 2024).

Note: These growth projections were determined by calculating the existing housing units and commercial area within the housing sites and upzoning areas, and multiplying the housing sites' and upzoning areas' parcel area by the allowable density in its Zoning District. These growth projections do not match the growth projections in the Site Inventory, which assume a smaller development yield. The intent of this greater growth projection for the purposes of this DEIR analysis is to ensure a conservative and comprehensive analysis is provided.

Source: Rincon Consultants 2024

As of 2024, Pacific Grove had a population of 14,966 and 8,252 housing units (California Department of Finance 2024). The project would provide capacity for up to 2,335 new housing units with an associated population increase of 4,950 people.[5] This would bring the total number of housing units in the city to 10,587 and the city's population to 19,916.

Table 2-11 lists the total increase in new development and population. This lists the maximum development anticipated as a result of the project. It should be noted that the analysis provided in this DEIR assumes a buildout of up to 100 percent of the maximum residential density, which is greater than the buildout calculations in the Site Inventory, in order to provide a conservative analysis. However, it is important to note that not all housing and commercial development would realistically be built, and this represents a conservative estimate to guide environmental analysis.

[5] Pacific Grove has an average of 2.12 persons per household (California Department of Finance 2024). The net increase of 2,713 housing units multiplied by an average of 2.12 persons per household equals approximately 5,752 people.

2.8 State Requirements

The following sections describe state housing law and general plan requirements that apply to the proposed project.

2.8.1 Housing Element

The housing element is one of the state-mandated elements of the General Plan, and it identifies the City's housing conditions and needs, and establishes the goals, objectives, and policies that comprise the City's housing strategy to accommodate projected housing needs, including the provision of adequate housing for low income households and for special-needs populations (e.g., unhoused people, seniors, single-parent households, large families, and persons with disabilities). The City's 5th Cycle Housing Element was approved in March 2016 and outlines the City's housing goals from 2015 to 2023.

State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The Housing Element Update identifies sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups defined under state law (California Government Code Section 65583); analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons. The project includes an update of the City of Pacific Grove Housing Element as part of the 6th Cycle planning period, which spans 2023-2031.

State law requires that all housing element updates include the following components:

- An assessment of the City's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations.
- An analysis of resources and constraints related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction and labor costs, and restricted financing availability.
- Identification of the City's quantified objectives for the City's 2023-2031 RHNA and inventory of sites determined to be suitable for housing.
- Identification of "Opportunities for Conservation in Residential Development" related to energy conservation in residential development.
- A review of the 5th Cycle housing element to identify progress and evaluate the effectiveness of previous policies and programs.
- A housing plan to address the City's identified housing needs, including housing goals, policies, and programs to facilitate the 6th Cycle planning goals.

The Housing Element addresses the 2022 AMBAG RHNA. On October 12, 2022, AMBAG adopted the 6th Cycle final RHNA, which includes a "fair share" allocation for meeting regional housing needs for each community in the AMBAG region.

2.8.2 Health and Safety Element

The safety element is also one of the state-mandated elements of the General Plan. The safety element identifies risks to life and property resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards. The safety element may also identify locally relevant safety issues, such as emergency response, and hazards and hazard abatement provisions to guide

local decisions related to zoning, subdivisions, and entitlement permits. The safety element should also contain general hazard and risk reduction strategies. The City's Health and Safety Element was adopted as part of the 1994 General Plan.

Recent state legislation has mandated the inclusion of additional assessments and measures associated with emergency evacuation and climate change. Approved in 2019, AB 747 requires each jurisdiction to review and update as necessary the safety element of its general plan to identify evacuation routes and capacity, safety, and viability under a range of emergency scenarios. This requirement is echoed in the County of Monterey Multi-Jurisdictional Hazard Mitigation Plan (2022), of which the City of Pacific Grove was a participating jurisdiction. Also approved in 2019, SB 99 requires jurisdictions, upon the next revision of the housing element on or after January 1, 2020, to review and update the safety element to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. In accordance with SB 379, safety elements must also include a climate change vulnerability assessment, adaptation and resilience goals, policies, objectives, and implementation measures to address vulnerabilities, and comprehensive hazard mitigation and emergency response strategy.

2.8.3 Land Use Element

The land use element is also one of the state-mandated elements of the General Plan. The land use element outlines the distribution, location, and extent of different land uses, including residential, commercial, industrial, agricultural, and open space uses. It is closely tied to the housing element and safety element as it ensures land use decisions support housing needs and incorporate safety considerations like hazard mitigation and disaster resilience. In addition, housing elements are required to include an analysis of land use controls and their potential impact on housing development. Changes to land use policies required to meet RHNA requirements and address constraints to the development of housing may necessitate amendments to the land use element.

2.9 Required Approvals

With recommendations from the City's Planning Commission, the City Council would need to take the following discretionary actions in conjunction with the proposed plan:

- Certification of the Final EIR
- Adoption of the 2023-2031 Housing Element
- Adoption of changes to the Land Use Element, Land Use Map, and Health and Safety Element of the General Plan
- Approval of amendments to zoning regulations, including rezoned sites and amendments to the City's zoning map[6]

The project would also require the following:

- Review and certification of the adopted 2023-2031 Housing Element Update by HCD to determine compliance with state law, and submittal of written findings to the City.

The updated Health and Safety Element will also be subject to review and approval from the California Department of Forestry and Fire Protection and Board of Forestry, prior to adoption of the updated Health and Safety Element by the City.

[6] Please note that rezoning of the additional parcels would occur at a later date as a separate action, and modifications to the additional parcels would not occur at this time; however, this EIR includes the additional parcels and the future proposed changes to provide a conservative analysis.

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3 Environmental Setting

This chapter provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Chapter 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The project area consists of the City of Pacific Grove, located on the Monterey Peninsula in northern Monterey County. Pacific Grove is located approximately 15 miles to the southwest of Salinas and 50 miles to the south of San José. Pacific Grove is bordered by the Monterey Bay and Pacific Ocean to the north and west; the City of Monterey to the east; and the Del Monte Forest (a census-designated place) to the south. Figure 2-1 in Chapter 2, *Project Description,* shows the location of the project area in the region.

Cities and communities in the region around Pacific Grove include Monterey, Seaside, Sand City, and Del Rey Oaks to the east and north; the City of Carmel-by-the-Sea to the southeast; and the communities of Del Monte Forest and Pebble Beach to the southwest. Major roadways that provide access to Pacific Grove include State Route (SR) 1, which travels north-south along the coast of Monterey County, and SR-68, which travels between Salinas and the Monterey Peninsula. The Mediterranean climate of the region and the coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months.

3.2 Project Area Setting

The City of Pacific Grove encompasses approximately 2.9 square miles (or 1,830 acres). The project involves housing sites, upzoning and rezoning areas, and additional parcels which are concentrated in the Downtown District, Central-Eardley Commercial District, and Forest Hill Commercial District in Pacific Grove. The housing sites, upzoning and rezoning areas, additional parcels, and districts are shown in Figure 2-3 in Chapter 2, *Project Description.*

Pacific Grove is characterized by its historic downtown and residential neighborhoods, urban forests and stands of trees, Monarch butterfly habitat, rugged coastline, and dramatic coastal views. The city has nearly continuous unobstructed views of the ocean, and few structures exist seaward of Ocean View Boulevard or Sunset Drive as most of the shoreline is in public ownership with public access. The city contains a range of inland and coastal habitat types, and wildlife contributes to the visual and cultural identity of Pacific Grove. Monterey pine, Monterey cypress, and coast live oak trees are located throughout the city, and Monarch butterflies, black-tailed deer, harbor seals, and sea otters can often be seen. Historic buildings also contribute to the setting and character of Pacific Grove, and the City's Historic Resources Inventory lists over 1,350 historic structures. Several portions of the city along the shoreline are located within the Coastal Zone, and are often characterized by rocky coastline, bluffs, beaches, trees, and coastal vegetation. Major roadways throughout Pacific Grove include Lighthouse Avenue, which travels northwest-southeast and provides access to downtown; Central Avenue, which travels northwest-southeast in the northern portion of the city; Ocean View Boulevard, which travels along Pacific Grove's northern coastline; and Sunset Drive, which travels along Pacific Grove's western coastline.

Existing land uses in Pacific Grove consist primarily of single-family residential neighborhoods, which make up approximately half of the city by area. The city's commercial and multi-family residential uses are concentrated along Lighthouse Avenue in the northern portion of the city, which includes the Downtown District; the northeastern portion of the city near Cannery Row, which includes the Central-Eardley Commercial District; and in the southeastern portion of the city along Forest Avenue, which includes the Forest Hill Commercial District. The housing sites are mostly located within or near these districts, and the upzoning areas consist of the Downtown District and the Forest Hill Commercial District. These districts primarily contain one- to two-story commercial uses, including restaurants, retail, and offices; some multi-family residential uses; and are generally surrounded by single family residential areas.

3.3 Existing Land Uses, General Plan Land Use Designations, and Zoning Designations within the Project Area

3.3.1 Downtown Commercial District

Existing Land Use

Downtown Pacific Grove is the historic and commercial center of the city, with ground-level retail, commercial spaces, and limited residential uses. The Downtown Commercial District (Figure 2-6, which also depicts proposed housing sites within/near this District) consists of relatively small lots occupied by one- and two-story structures. Civic buildings, including City Hall, Pacific Grove Police Department, Pacific Grove Fire Station 14, Pacific Grove Public Library, Pacific Grove Museum of Natural History, and Pacific Grove Youth Center are located in close proximity the Downtown Commercial District.

General Plan Land Use Designations

General Plan land use designations within the Downtown Commercial District consist of Downtown Commercial, which provides for retail and service uses, offices, restaurants, and multi-family residential uses above the ground floor. City Hall has a Public land use designation, which provides for government-owned facilities and schools.

Zoning Designation

Zoning within the Downtown Commercial District mostly consists of the Commercial-Downtown (C-D) zone. The C-D zone allows housing above ground-level retail, upper floor residential, heights of up to 40 feet, no setbacks, and 100 percent lot coverage. The C-D zone allows single-family units and up to seven multi-family dwelling units by-right, with eight or more units requiring a Use Permit. Maximum density in the C-D District corresponds to the maximum density of the nearest General Plan residential land use category, up to 30 dwelling units per acre.

3.3.2 Central-Eardley Commercial District

Existing Land Use

The Central-Eardley Commercial (CEC) District (Figure 2-7, which also depicts proposed housing sites within/near this District) is a transitional area on the eastern boundary of Pacific Grove, bordering

the City of Monterey. The CEC District separates Monterey's Cannery Row and Lighthouse Avenue commercial areas from residential areas in Pacific Grove. The corridor serves as an eastern gateway to Pacific Grove with retail, commercial uses, restaurants, and offices, servicing both visitors and residents. The corridor has some residential uses along Central Avenue and to the west, which contain a range of existing housing types from single-family residential to small scale multi-family. Single-story commercial buildings largely line the corridor with some multi-story office buildings interspersed throughout. The CEC District includes the American Tin Cannery, currently occupied with retail uses, which is the site of an approved, though not yet constructed, hotel project (refer to Chapter 3, *Environmental Setting*).

General Plan Land Use Designations

The CEC District has a General Plan land use designation of Central-Eardley Commercial, which allows for retail and service uses, offices, restaurants, some residential uses, and similar and compatible uses.

Zoning Designation

The CEC District is mostly zoned Light Commercial (C-1) and Heavy Commercial (C-2) under the City's existing Zoning Code. These Zoning Districts allow for a mix of commercial and residential uses, heights of up to 40 feet, no setbacks, and 90 percent lot coverage. The C-1 and C-2 zones allow single-family units and up to seven multi-family dwelling units by-right, with eight or more units requiring a Use Permit. Maximum density in the CEC District corresponds to the maximum density of the nearest General Plan residential land use category, up to 30 dwelling units per acre.

3.3.3 Forest Hill Commercial District

Existing Land Use

Forest Hill is a commercial corridor in southern Pacific Grove, near the boundary with the city of Monterey. The Forest Hill Commercial District (Figure 2-8, which also depicts proposed housing sites within/near this District) extends from Stuart Avenue to north of David Avenue and includes commercial uses along Forest Hill Avenue and the Country Club Gate (CCG) Shopping Center. The Forest Hill Commercial District contains a mixture of retail, office, and multi-family residential uses. The corridor is auto-oriented with shopping centers, major grocery store chains, and associated large surface parking lots, and is primarily surrounded by single-family and multi-family residential uses as well as Pacific Grove Elementary School and Pacific Grove High School to the north of the CCG Shopping Center.

General Plan Land Use Designations

The Forest Hill Commercial District has a General Plan land use designation of Forest Hill Commercial and CCG Shopping Center. The Forest Hill Commercial land use designation allows for retail and service uses, grocery stores, restaurants, offices, public and quasi-public uses, and similar and compatible uses. The Forest Hill Commercial District is also governed by the Forest Hill Specific Plan (1998), which reiterates the Forest Hill Commercial land use designation from the City General Plan for the District.

Zoning Designation

The Forest Hill Commercial District is zoned Forest Hill Commercial (C-FH) under the City's existing Zoning Code. This zone allows housing and retail uses, heights of up to 35 feet, 10-foot rear setbacks (5-foot side setbacks adjacent to residential uses), and 75 percent lot coverage. Currently, maximum density in the C-FH zone corresponds to the maximum density of the nearest General Plan residential land use category, up to 30 dwelling units per acre.

3.3.4 Dennett, Sinex, and Grove Acre Neighborhood

Existing Land Use

The Dennett, Sinex, and Grove Acre Neighborhood (Figure 2-9, which also depicts proposed housing sites within/near this Neighborhood) is a residential neighborhood in the western portion of Pacific Grove. This Neighborhood is bounded by Dennett Street to the north and west, Sinex Avenue to the south, and Grove Acre Avenue to the east, and primarily contains single-family residential uses. The Neighborhood is surrounded by motels to the west, multi-family residential uses to the west, east, and north, and single-family residential uses to the north, east, and south.

General Plan Land Use Designations

The Dennett, Sinex, and Grove Acre Neighborhood has a General Plan land use designation of Medium Density Residential 8.7, which allows for single-family, duplex, and multi-family residential, public and quasi-public, and similar compatible uses.

Zoning Designation

The Dennett, Sinex, and Grove Acre Neighborhood is zoned Multiple-Family Residential (R-2-B-3) under the City's existing Zoning Code. This zone allows single-family and duplex housing, heights of up to 30 feet, 20-foot front setbacks, 20- to 25-foot rear setbacks, 3- to 10-foot side setbacks, and 60 percent lot coverage. Currently, maximum density in the R-2-B-3 zone is 8.7 dwelling units per acre.

3.3.5 Sunset Service Commercial District

Existing Land Use

The Sunset Service Commercial (SSC) District (Figure 2-10, which also depicts proposed housing sites within/near this District) is Pacific Grove's only remaining industrial and heavy commercial area, located in the southwestern portion of the city, on both sides of Sunset Drive, east of 17 Mile Drive, and along the city's boundary with the Del Monte Forest. The SSC District is divided into two areas, with a public works parcel south of Sunset Drive separating the two areas. The SSC District extends from 17 Mile Drive to Asilomar Avenue, and contains a mixture of retail, office, motel, and light industrial uses. The area is primarily surrounded by public uses in between portions of the SSC District, single-family and multi-family residential uses to the north, and the Links at Spanish Bay Golf Course to the south.

General Plan Land Use Designations

The SSC District has a General Plan land use designation of Sunset Service Commercial, which provides for retail, service, and light industrial uses.

Zoning Designation

The SSC District is zoned C-2 and Restricted Industrial (I) under the City's existing Zoning Code. These zones allow service commercial and light manufacturing uses, heights of up to 40 feet, 10-foot rear setbacks (5- to 10-foot side setbacks adjacent to residential zones), and 90 percent lot coverage. The C-2 zone allow single-family units and up to seven multi-family dwelling units by-right, with eight or more units requiring a Use Permit. The I zone allows single-family and multi-family units with a Use Permit. Currently, maximum density in the C-2 and I zones correspond to the maximum density of the nearest General Plan residential land use category, up to 30 dwelling units per acre.

3.3.6 Neighborhood Commercial District

Existing Land Use

The Neighborhood Commercial (NC) District (Figure 2-10, which also depicts proposed housing sites within/near this District) is a commercial land use designation scattered throughout Pacific Grove, specifically located at the corner of Shafter and Buena Vista Avenues, at Congress Avenue and Sunset Drive, and on David Avenue west of Patterson Lane. The NC District consists of a mortuary on Lighthouse Avenue, a vacant commercial building on Lighthouse Avenue, and single-family residential uses in the Del Monte Park neighborhood.

General Plan Land Use Designations

The NC District has a General Plan land use designation of Neighborhood Commercial, which provides for locally-oriented retail and service uses that are consistent with historical uses of properties within the NC District.

Zoning Designation

The NC District is zoned C-1, Multiple-Family Residential (R-3-P.G.R.), and Single-Family Residential (R-1) under the City's existing Zoning Code. The C-1 zone allows for a mix of commercial and residential uses, heights of up to 40 feet, no setbacks, and 60 percent lot coverage. The C-1 zone has a maximum density that corresponds to the maximum density of the nearest General Plan residential land use category. The R-3-P.G.R. zone allows for single-family and multi-family residential uses and bed and breakfast inns, heights of up to 30 feet, 5- to 12-foot rear setbacks, 8-foot front setbacks, 3- to 10-foot side setbacks, and 90 percent lot coverage. The R-3-P.G.R. zone has a maximum density of 19.8 dwelling units per acre. The R-1 zone allows for single-family residential uses, heights of up to 25 feet, 10- to 15-foot rear setbacks, 15-foot front setbacks, 10-foot side setbacks, and 60 percent lot coverage. The R-1 zone has a maximum density of 10.9 dwelling units per acre.

3.3.7 Presidio-Austin Commercial District

Existing Land Use

The Presidio-Austin Commercial (PAC) District (Figure 2-10, which also depicts proposed housing sites within/near this District) is a commercial area in the southern portion of Pacific Grove, within the Del Monte Park neighborhood, west of Presidio Boulevard and north of Highway 68, bordering the Presidio of Monterey and the unincorporated area of Monterey County (i.e., the Del Monte

Forest). The PAC District consists of single-story commercial uses and is primarily surrounded by single-family and multi-family residential uses and the Del Monte Forest.

General Plan Land Use Designations

The PAC District has a General Plan land use designation of Presidio-Austin Commercial, which provides for a mix of retail and service commercial uses, offices, multi-family residential uses, public and quasi-public uses, and similar and compatible uses.

Zoning Designation

The PAC District is zoned C-1 under the City's existing Zoning Code. The C-1 zone allows for a mix of commercial and single-family and multi-family residential uses, heights of up to 40 feet, no setbacks, and 60 percent lot coverage. The C-1 zone has a maximum density that corresponds to the maximum density of the nearest General Plan residential land use category.

3.3.8 Additional Parcels for Environmental Review

Existing Land Use

The DEIR analysis includes 15 additional parcels (Figure 2-11, which also depicts proposed housing sites) that are not included in the Housing Element. These additional parcels are scattered throughout the city and include vacant parcels in Low and Medium Density Residential neighborhoods as well as parcels with existing commercial uses in the Downtown and Forest Hill Commercial Districts and industrial uses in the SSC District.

General Plan Land Use Designations

The 15 additional parcels have General Plan land use designations of Low Density Residential 4.4, Medium Density Residential 9.7, Medium Density Residential 12.1, Downtown Commercial, Forest Hill Commercial, and Sunset Service Commercial. The Low Density Residential 4.4 land use designation provides for single-family homes, secondary residential units ("second units"), public and quasi-public uses, and similar and compatible uses. The Medium Density Residential 9.7 and Medium Density Residential 12.1 land use designations provide for single-family, duplex, and multi-family residential units, public and quasi-public uses, and similar and compatible uses. The Downtown Commercial, Forest Hill Commercial, SSC Districts are described above.

Zoning Designation

The 15 additional parcels are zoned Single-Family Residential (R-1 and R-1-B-3), C-D, C-FH, and I zoning under the City's existing Zoning Code. The R-1 zone is described under Section 2.3.8; the C-D zone is described under Section 2.3.2; the C-FH zone is described under Section 2.3.4; and the I zone is described under Section 2.3.6. The R-1-B-3 zone allows for single-family residential uses, heights of up to 25 feet, 20-foot front and rear yard setbacks, and 40 percent lot coverage.

3.4 Cumulative Development

In addition to the specific impacts of individual projects, the California Environmental Quality Act (CEQA) requires Environmental Impact Reports (EIRs) to consider potential cumulative impacts of a proposed project. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative

impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. *CEQA Guidelines* Section 15130(b) presents two possible approaches for analyzing cumulative impacts:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency; or
- A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

For a conservative approach, the cumulative analyses included in each of the environmental analysis areas in Chapter 4 of this DEIR will consider buildout of local planning documents as well as past, present, and reasonably anticipated future individual development projects throughout Pacific Grove and within one mile of the city on the Monterey Peninsula. Local planning documents include the current City of Pacific Grove General Plan as well as those applicable to the nearby city of Monterey and adjacent areas of unincorporated Monterey County, specifically the Del Monte Forest area. Applicable plans include:

- City of Monterey General Plan (adopted 2005, amended 2019)
- City of Monterey Lighthouse Specific Plan (adopted and amended 2016)
- City of Monterey New Monterey Area Plan (adopted 1991)
- County of Monterey Del Monte Forest Land Use Plan (adopted and amended 2012)

Currently planned and pending projects in Pacific Grove and within one mile of the city in surrounding areas are listed in Table 3-1 and shown in Figure 3-1. Planned and pending projects that do not increase the number of residential units or square footage of non-residential uses are not included in this list. These projects are considered in the cumulative analyses in Chapter 4, *Environmental Impact Analysis*.

Table 3-1 Cumulative Projects List

Project No.	Project Name	Project Location	Proposed Development	Status
City of Pacific Grove[1]				
1	American Tin Cannery Hotel and Commercial Project	125 Ocean View Boulevard	225-room hotel with restaurant and bars, conference facilities, and other amenities; 20,000 square feet of retail; subgrade parking	Coastal Development Permit approved by the California Coastal Commission
2	PG Kimpton Hotel Project	157 Grand Avenue	102-room hotel with restaurant and outdoor dining	Under construction
3	420 La Calle Corte Residential Project	420 La Calle Corte	Construction of a new single-family residence and relocation of existing residence within parcel	Environmental review complete and project approved; construction not started
4	Tabak Residence	1239 Surf Avenue	Construction of an ADU and additions to an existing residence	Project approved; building permit pending
5	Wilson Residence	985 Piedmont Avenue	One new residence	Under construction
City of Monterey[2]				
6	300 Cannery Row Project	300 Cannery Row	Conversion of existing building to eight condominiums and 8,500 square feet of retail	Planning permit approved; currently in review with Coastal Commission
7	480 Cannery Row Project	480 Cannery Row	51 multi-family residential units, 87,362 square feet of commercial use, 30,000 square feet of restaurant use	Received planning permits; coastal permit for small-scale desalination denied
8	704 Foam Street Project	704 Foam Street	Demolition of existing building and construction of four detached single family units	Planning permits in review; environmental review pending
9	600 Irving Avenue Project	600 Irving Avenue	Construction of addition to existing structure for five residential units	Planning permits approved; water allocation pending
10	601 Lighthouse Avenue Project	601 Lighthouse Avenue	Conversion of existing building to four apartments, 3,345 square feet of retail, 914 square feet of office	Under construction
11	419 Wave Street Project	419 Wave Street	Conversion of warehouse to retail use	Under construction
12	457 Wave Street Project	457 Wave Street	Construction of two new buildings for four condominiums	Building permit incomplete
Del Monte Forest				
No projects involving substantial development (i.e., more than four housing units, 1,000 sf of commercial use, or 10 hotel rooms).				

[1] City of Pacific Grove 2024

[2] City of Monterey 2025

Figure 3-1 Cumulative Projects



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4 Environmental Impact Analysis

This chapter discusses the possible environmental effects of the City of Pacific Grove Housing Element Update, Zoning Ordinance Amendments, and General Plan Amendments ("project" or "proposed project") for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A "significant effect" as defined by the *CEQA Guidelines* Section 15382:

> "…means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

The assessment of each issue area begins with a discussion of the environmental setting related to the issue area, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved pursuant to *CEQA Guidelines* Section 15093.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the significance threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings if the project is approved under *CEQA Guidelines* Section 15091.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could itself have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Chapter 3, *Environmental Setting*.

The Executive Summary of this DEIR summarizes all impacts and mitigation measures that apply to the proposed project.

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4.1 Aesthetics

The analysis in this section describes the current visual conditions in and around Pacific Grove and evaluates the potential aesthetic and visual impacts of buildout under the proposed project, including potential impacts on scenic vistas, scenic resources, and visual character and quality, as well as potential impacts related to light and glare.

4.1.1 Setting

a. Existing Visual Conditions

Pacific Grove is a small coastal community located on the Monterey Peninsula, bordered by Del Monte Forest to the southwest, City of Monterey to the southeast, Monterey Bay to the northeast, and the Pacific Ocean to the northwest. The City is characterized by its historic buildings, quaint neighborhoods, urban forests and stands of trees, Monarch butterfly habitat, rugged coastline, and dramatic ocean views. Pacific Grove's scenic resources within the Coastal Zone include nearly continuous unobstructed views of the sea and sea life in the Bay. Year-round residents and visitors enjoy the recreation trail and the sandy beaches at Lovers Point. Scenic resources are publicly visible from not only areas in the Coastal Zone but also from areas on Monterey Bay and across the Bay. Few structures exist seaward of Ocean View Boulevard or Sunset Drive, and most of the shoreline is in public ownership with public access provided in many areas by a system of heavily used recreation trails along a major portion of the coastline. The two main vehicular entrances to the city are State Route (SR) 68 (also referred to as "Holman Highway") from the south and Lighthouse Avenue (through Monterey) from the southeast.

Scenic Resources and Vistas

Neither the current Pacific Grove General Plan nor the City's Municipal Code define visual resources within the city. However, what is considered "scenic" can generally be considered the environmental setting (i.e., scenic and visual qualities) within the public viewsheds that provide scenic value. Scenic resources typically include natural open spaces, unique mature trees, unique topographic formations, natural landscapes, and aspects of the built environment such as parks, trails, cultural resources, and architecturally significant buildings.

A viewshed is defined as the limits of what the viewer can see looking out from the limits of the proposed project. For the purposes of this DEIR, the perspective of the viewer from public areas looking toward or from within these scenic resources is considered the viewshed. Using key features of the landscape as framing devices, viewsheds provide examples of what the viewer might see from anywhere within the scenic resource and are representative of what might be affected by a given project when the proposed project is implemented. For example, an area's topography can contribute to aesthetic value through the creation of view corridors and/or scenic vistas consisting of ridgelines and mountains that can form a community's visual backdrop. Viewsheds can also include a range of resources (including natural and man-made elements), and thus natural and man-made environments can be considered important scenic resources.

Pacific Grove's Coastal Zone, as identified by the Pacific Grove Local Coastal Program (LCP), includes approximately 458 acres of land. The Coastal Zone also extends offshore three nautical miles from the mean high tide line, and the Coastal Commission retains jurisdiction in that area and oversees

the issuance of Coastal Development Permits for development within that zone (City of Pacific Grove 2020). Vegetation in this coastal zone includes wetland habitat and scattered mature trees.

The Pacific Grove LCP Land Use Plan (LUP) designates areas within the Coastal Zone by the City as having special scenic significance; however, it is also the policy of the City to consider and protect the visual quality of all scenic areas that are part of the public viewshed, whether specifically designated as a resource of public importance or not. Designated scenic resources within Pacific Grove's Coastal Zone include: all public view areas along Pacific Grove's shoreline; all areas seaward of Ocean View Boulevard and Sunset Drive; Lighthouse Reservation lands; Asilomar Conference Ground dune lands visible from Sunset Drive; lands fronting on the east side of Sunset Drive; the Asilomar Dunes residential area; and the forest-front zone between Asilomar Boulevard and the crest of the high dune (from the north side of Pico Avenue intersection to Sinex Avenue) (City of Pacific Grove 2020).

Scenic resources identified in Pacific Grove's LCP, shown on Figure 4.1-1, represent a preliminary mapping of visually sensitive areas. Other scenic resources may be identified to be present based on existing conditions at the time proposed development is considered. Views from each of these areas are described below:

- **Area I: Point Cabrillo.** Scenic views of the Pacific Ocean and Point Cabrillo are provided by view areas located north of Ocean View Boulevard and a viewpoint on Dewey Avenue. The Monterey Bay Coastal Trail skirts the shoreline just north of Ocean View Boulevard.
- **Area II: Pacific Grove Retreat.** Scenic views of the Pacific Ocean and shoreline are provided by view areas located north of Ocean View Boulevard and viewpoints located along Central Avenue. Berwick Park and the Monterey Bay Coastal Trail follow the shoreline and Ocean View Boulevard.
- **Area III: Lovers Point.** Scenic views of the Pacific Ocean and Lovers Point are provided by view areas located north of Ocean View Boulevard, and viewpoints along the roadway. Lovers Point Beach, Lovers Point Park, and the Monterey Bay Coastal Trail are located north of Ocean View Boulevard.
- **Area IV-A: Ocean View Area.** Scenic views of the Pacific Ocean and Otter Point are provided by view areas located north of Ocean View Boulevard and the Perkins Park Vista Point. Perkins Park, Otter Point, a viewpoint for Kissing Rock, Pacific Grove Marine Gardens Park, and the John Denver Memorial are connected by a network of small walking paths and trails north of Ocean View Boulevard.
- **Area IV-B: Point Pinos.** Scenic views of the Pacific Ocean and Point Pinos are provided by view areas located north of Ocean View Boulevard and two viewpoints on the golf course proximate to Point Pinos Lighthouse Reservation. Point Pinos Lighthouse Reservation, the golf course, and Point Pinos Lighthouse are located south and east of Ocean View Boulevard. The Great Tidepool, rocky outcrops off the coastline, and access to the shoreline are located north and west of Ocean View Boulevard.
- **Area V: Union Pacific Right-of-Way.** This subarea follows the Union Pacific Railroad (UPRR) right-of-way from Area III, northwest through Point Pinos Lighthouse Reservation lands and golf course, then continues south-southwest along Railroad Way before terminating at Sunset Drive. Viewpoints within the Lighthouse Reservation provide views of the manicured golf green and distant ocean.
- **Area VI: Asilomar.** Scenic views of the Pacific Ocean, Asilomar State Beach, and dune lands are provided by view areas and viewpoints located north of Asilomar Avenue and Sunset Drive. Asilomar Trail follows Sunset Drive along the coastline. Asilomar State Marine Reserve, the Asilomar Conference Grounds and Spanish Bay are also visible in this subarea.

Figure 4.1-1 Local Coastal Program Land Use Plan – Scenic Areas



Scenic Highways

California's Scenic Highway Program designates scenic highways with the intention of protecting these corridors from change that would diminish the aesthetic value of adjacent lands. A highway is designated as an official scenic highway when the local governing body (city or county) applies to the California Department of Transportation (Caltrans) for scenic highway approval, and Caltrans determines that the eligible scenic highway qualifies for official status (Caltrans 2025). Scenic highways must have an approved Corridor Protection Program and remain in compliance to maintain designated scenic highway status.

According to the Caltrans State Scenic Highway Mapping System, State Route (SR-) 1 is the nearest designated state scenic highway to the city, approximately 1.75 miles southeast. SR-68, from SR-1 to Asilomar Avenue, is eligible for state scenic highway designation but has not been officially designated (Caltrans 2019). Both highways are shown on Figure 2-1 and Figure 2-2 in Chapter 2, *Project Description.*

Visual Character

Pacific Grove is an established coastal community, primarily developed with residential neighborhoods and distinct historic architecture. Single family residential land uses dominate most of the area in the central and southern parts of the city. Commercial uses and multi-family residential uses are concentrated along Lighthouse Avenue, which runs generally east-west in the northern portion of the city, and along Forest Avenue, which runs generally north-south in the southern and eastern portions of the city. Open space and dispersed single-family residences are located on the city's perimeter along the Pacific Ocean and Monterey Bay. The elevated hillside areas of Pacific Grove and views toward the ocean and Monterey Bay from both high and low elevations provide for scenic vistas or viewpoints with Monterey Bay as the focal point. Pacific Grove is largely characterized by its sweeping coastal views and the presence of large, mature Monterey cypress and pine trees (Figure 4.1-2a, Photograph 1 and 2).

The City designates seven areas of unique physical and visual quality with respect to three factors which give them visual character: dominant landscape or seascape features, topography, and predominant land use. Three of these areas are dominated visually by the natural landscape and community green space: (1) the coastal corridor; (2) forested lands; and (3) lawns and golf course (City of Pacific Grove 1994). The remaining four areas are visually dominated by the urban or built environment: (4) the historic commercial core; (5) the historic residential core; (6) non-historic commercial; and (7) non-historic residential areas (City of Pacific Grove 1994). The visual characteristics of these areas are listed below:

1. **Coastal Corridor.** This subarea is visually dominated by the shoreline, and extends approximately four miles west along Ocean View Boulevard from the city boundary near David Avenue to Point Pinos and continues south along Sunset Drive to the southern end of the Asilomar State Beach and Conference Grounds. This subarea includes coastal dunes, which extend up to 0.25 mile inland; commercial areas; residential areas; and Pacific Grove Golf Links. (See Figure 4.1-2a, Photograph 2)
2. **Forested Lands.** This subarea includes coastal coniferous forests which provide a visual contrast to the open coastal corridor present along the shoreline and add dimension to the landscape. Tree stands and denser, low-lying vegetation create a lush, forest-like character. (See Figure 4.1-2a, Photograph 1)

3. **Lawns and Golf Course.** This subarea includes facilities such as Pacific Grove Golf Links, the cemetery, school playing fields, and parks such as Jewell Park, Berwick Park, Caledonia Park, and Lovers Point Park which provide an important open-space element to the City. (See Figure 4.1-2a, Photograph 4)
4. **Historic Commercial Core.** Pacific Grove's Downtown District is located along Lighthouse Avenue, between Cypress Avenue and 12th Street, and on Forest Avenue between Central Avenue and Pine Avenue. The visual character of the Downtown District is dominated by one- to three-story commercial buildings, many of which were built during the early 1900s. (See Figure 4.1-2b, Photograph 5)
5. **Historic Residential Core.** The historic residential area contained residences constructed during the late 1800s and early 1900s and is generally bounded by Junipero Avenue, 1st Street, Ocean View Boulevard, Pacific Avenue, and Alder Street. The visual character of this subarea is defined by densely packed, well-maintained homes along narrow streets. Many large, mature trees, most notably Monterey cypress, Monterey pine, and coast live oak, grow throughout the historic residential district. (See Figure 4.1-2b, Photograph 6)
6. **Non-Historic Commercial.** Pacific Grove has four non-historic commercial areas, two of which are located at the city's major entrances: one at the northeast corner of the city and is bounded by Eardley Avenue, Ocean View Boulevard, Dewey Avenue, and Central Avenue (see Figure 4.1-2a, Photograph 3), and one at the southern entrance to the city on Forest Avenue . A third, smaller commercial district is located along Sunset Drive between 17 Mile Drive and Asilomar Avenue. The last, and smallest, commercial district is located along Presidio Boulevard and Austin Avenue near the Presidio Boulevard entrance to the city from SR-68. (See Figure 4.1-2b, Photograph 7)
7. **Non-Historic Residential.** This subarea covers the majority of Pacific Grove's residential area, and includes most of the residential development south of Junipero Avenue and west of Alder Street, and the residential development both north and south of Pacific Grove Golf Links. These areas offer a rich diversity of housing that is generally well-maintained, landscaped, and attractive with varying architectural styles. (See Figure 4.1-2b, Photograph 8)

Figure 4.1-2a Existing Visual Character



Photograph 1. SR-68 gateway leading into Pacific Grove, looking southwest. (Rincon 2025)



Photograph 2. Coastal corridor along Ocean View Boulevard near Point Pinos Lighthouse Reservation, looking west. (Rincon 2025)



Photograph 3. Gateway to Pacific Grove at the intersection of Central Avenue and Eardley Avenue, looking west. (Rincon 2025)



Photograph 4. Lawns and golf course amidst sand dunes at the intersection of Ocean View Boulevard, Lighthouse Avenue, and Sunset Drive, looking northwest. (Rincon 2025)

Gateways

Gateways are aesthetic markers that visually define the entrance points to the city. They can include details specific to the city such as monuments, art works, or signs that announce the key points of ingress and egress, usually on major roadways. Gateways are important for a community as they help create a sense of place by visually and aesthetically calling attention to important events, persons, and places that speak to the sense of the city's identity by visual means. The city contains two primary gateway areas, as described below.

- **Central-Eardley Commercial (CEC) District.** This gateway is located at the eastern-most point of the City of Pacific Grove boundary. The CEC District separates Monterey's Cannery Row and Lighthouse Avenue commercial areas from residential areas in Pacific Grove. The corridor is currently developed with retail, commercial uses, restaurants, and offices, servicing both visitors and residents. The corridor has some residential uses along Central Avenue and to the west, which contain a range of existing housing types from single-family residential to small scale multi-family. (See Figure 4.1-2a, Photograph 3)
- **Forest Hill Commercial District.** The gateway is located in the southern portion of the city. The Forest Hill Commercial District extends from Stuart Avenue to north of David Avenue, and contains a mixture of retail, office, and multi-family residential uses. The corridor is vehicle-oriented with shopping centers, major grocery store chains, and associated large surface parking lots, and is primarily surrounded by single family and multi-family residential uses. (See Figure 4.1-2b, Photograph 7)

Gateways add to the city structure and provide one approach to reflecting the City's vision for a cohesive visual relationship among the landscape, long-established neighborhood development, and new housing, employment, retail, recreation, arts, and other uses for residents and visitors alike.

Figure 4.1-2b Existing Visual Character



Photograph 5. Historic commercial core at the intersection of Fountain Avenue and Lighthouse Avenue, looking south. (Rincon 2025)



Photograph 6. Historic residence at Pine Avenue and 11th Street, looking north. (Rincon 2025)



Photograph 7. Non-historic commercial development at the intersection of Forest Avenue and David Avenue, looking north. (Rincon 2025)



Photograph 8. Non-historic residences at the intersection of Ripple Avenue and 17 Mile Drive, looking east. (Rincon 2025)

Light and Glare Conditions

For the purpose of this analysis, light refers to light emissions (brightness) generated by a source of light. Existing development and motor vehicles in Pacific Grove produce light and glare. Stationary sources of light include exterior building lighting, lighted signage, exterior parking lot lighting, building security lighting, and streetlights; moving sources of light include the headlights of vehicles driving on roadways.

Glare is defined as focused, intense light emanating directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Glare also refers to the discomfort or impairment of vision experienced when a person is exposed to a direct or reflected view of a light source, causing objectionable brightness that is greater than that to which the eyes are adapted. Reflective surfaces are associated with buildings that have expanses of polished or glass surfaces, light-colored pavement, and the windshields of parked cars. General sources of glare in Pacific Grove include reflected sunlight from the Pacific Ocean, building windows, automobile windows, and from glass building façades.

4.1.2 Regulatory Setting

a. State Regulations

California Coastal Act

Section 30251, *Scenic and Visual Qualities,* of the California Coastal Act (CCA) mandates that scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government is required to be subordinate to the character of its setting.

California Coastline Preservation and Recreation Plan

The California Coastline Preservation and Recreation Plan (published in 1971, reprinted in 1972) was prepared by the California Department of Parks and Recreation to assist the Department and other agencies in determining future preservation and recreation needs along the California coastline. The plan provides recommendations regarding coastal activities and developments undertaken by most public and private agencies that will in some way enhance or detract from the natural beauty, ecological stability and recreation potential of natural resources along California's coastline.

Caltrans Scenic Highways

Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way, which traverses an area of exceptional scenic quality. Suitability for designations as a state scenic highway is based on the vividness, intactness, and unity of their view corridors (Caltrans 2023):

- **Vividness** is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer.
- **Intactness** is the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions (e.g., buildings, structures, equipment, grading).
- **Unity** is the extent to which development is sensitive to and visually harmonious with the natural landscape.

As discussed in Section 4.1.1, *Setting*, SR-1 is the only state-designated scenic highway in the project area.

Housing Crisis Act (SB 330, 2019)

The Housing Crisis Act of 2019 (SB 330) seeks to accelerate housing production by eliminating some of the most common entitlement impediments to the creation of new housing. These may include delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. On September 16, 2021, SB 8 was signed into law which made some clarifications and updated SB 330, extending the Housing Crisis Act from January 1, 2025 to January 1, 2030.

b. Local Regulations

City of Pacific Grove General Plan

The Pacific Grove General Plan (City of Pacific Grove 1994) designates two scenic drives in the city: Ocean View Boulevard and Sunset Drive between Ocean View Boulevard and Asilomar Avenue. Existing city General Plan goals and policies related to aesthetics and visual character are identified below. These goals and policies are shown to demonstrate where policies or existing regulations are in place to help guide land use decisions and/or mitigate environmental concerns.

Land Use Element

Goal 1. Provide for orderly, well-planned, and balanced development consistent with the historic nature of Pacific Grove, the capacity of the City's infrastructure, and ability to assimilate new growth.

- **Policy 1.** Seek to preserve Pacific Grove's traditional "hometown" qualities.
- **Policy 1.5**. Protect Pacific Grove's residential character by prohibiting the short-term (less than 30 consecutive calendar days) rental of residential property in residential zoning districts, except to the extent such use is allowed in the Coastal Zone under the Local Coastal Program. The Pacific Grove Municipal Code shall be consistent with this Policy.
- **Policy 2.** Ensure that new development is compatible with adjacent existing development.
- **Policy 3.** Balance a property owner's ability to develop with the desirability of maintaining neighborhood character.
- **Policy 4.** Continue to preserve Pacific Grove's character and regulate development so as not to overburden the City's infrastructure.

- **Policy 9.** Strive to preserve significant public view corridors.
- **Policy 13.** Assure that new commercial development is designed to avoid the appearance of strip development.

Goal 5. Enhance the appearance of Downtown.

- **Policy 21**. Upgrade the visual quality of streets in the Downtown.
- **Policy 22.** Review and revise height and story limits to maintain compatibility of new and remodeled buildings with the existing character of Downtown.
- **Policy 26.** Provide for retention of the commercial/industrial uses in the Sunset Drive commercial district, while addressing the scenic qualities of this area.
    - **Program AA.** Consider amending the Zoning Ordinance to eliminate uses incompatible with General Plan policy regarding the Sunset Service Commercial Area.[1]

Urban Structure and Design Element

Goal 1. Emphasize and promote the overall visual attractiveness of Pacific Grove.

- **Policy 1.** Develop a cohesive and aesthetically pleasing urban structure for Pacific Grove.
- **Policy 2.** Continue to require citywide architectural review for all new structures, and for exterior changes to existing structures.
    - **Program A.** Review and improve architectural review guidelines to implement the policies of this General Plan.
    - **Program B.** While recognizing the individuality of existing neighborhoods within the city, develop design standards that encourage new structures and additions to contribute to the existing scale and character of the area, while allowing for creativity in design.
- **Policy 3.** Improve the visual quality of Pacific Grove's major boulevards.
- **Policy 4.** Enhance city entrances and major commercial nodes.

Goal 2. Enhance the relationship between the city and the Pacific Ocean and Monterey Bay.

Goal 3. Maintain and enhance the quality of the city's landscape and streetscape.

- **Policy 8.** Endeavor to protect the tree canopy created by mature trees by planting replacement trees.
- **Policy 9.** Use street trees to enhance and soften the visual character of major streets within the city.
- **Policy 11.** Reduce the visual chaos that results from overhead wires, light poles, and a high density of commercial signs.
    - **Program K.** Underground all utilities in entry areas that are particularly scenic or provide important views into Pacific Grove.
    - **Program L.** Develop a street lighting program emphasizing adequate public safety, minimum glare, and aesthetics.

[1] Under the proposed project, this policy would be updated to allow for increased flexibility of development standards in the Sunset Service Commercial Area. Refer to Chapter 2, *Project Description.*

Parks and Recreation Element

Goal 2. Designate adequate land for developing parks and recreation facilities.

- **Policy 4**. Protect sensitive habitats, natural landforms, and scenic resources in planning for recreation facilities and for open space, taking into account the carrying capacity of the areas.

Natural Resources Element

Goal 3. Preserve public visual access to the ocean.

- **Policy 3.** Actively promote tree planting to maintain and renew the urban forest.

City of Pacific Grove Local Coastal Program

The Pacific Grove LCP, including the Land Use Plan and Implementation Plan, was certified by the California Coastal Commission in March 2020. The plan contains background information and policies addressing the city's scenic resources along the coastline. The LCP contains policies directly related to preserving and protecting the scenic value of the coastline in Pacific Grove by addressing height limits, lighting fixtures, and development standards for development in the Coastal Zone. Relevant LCP policies are listed below. Section 4.10, *Land Use and Planning*, includes discussion on overall project consistency with the LCP.

- **Policy SCE-1.** Public views to and along the shoreline shall be protected and enhanced, and alteration of natural landforms shall be minimized.
- **Policy SCE-2.** Preserving and enhancing the scenic qualities of the Coastal Zone is a priority in all City actions and decisions. Development that could adversely impact public views and scenic coastal areas shall only be allowed where it protects, preserves, and, if feasible, enhances such scenic and visual qualities.
- **Policy SCE-3.** Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses or are locally important historic areas.
- **Policy SCE-4.** The portion of Pacific Grove's Coastal Zone designated as having special scenic significance (i.e. scenic public view areas or scenic public view points) includes all areas designated on Figure 4, Scenic Areas [incorporated herein as Figure 4.1-1], including all public view areas along Pacific Grove's shoreline; areas seaward of Ocean View Boulevard and Sunset Drive; Lighthouse Reservation lands and Point Pinos Lighthouse; Asilomar Conference Ground dune lands visible from Sunset Drive; the Asilomar Dunes residential area; lands fronting the east side of Sunset Drive and the forest-front zone between Asilomar Avenue and the crest of the high dune (from the north side of Pico Avenue intersection to Sinex Avenue); public street ends along Central Avenue and other areas in which future study may support special scenic significance designation. The City will consider and protect the visual quality of these special scenic areas as a resource of public importance.
- **Policy SCE-5.** The City will designate scenic areas of the Coastal Zone, including those areas described in Policy SCE-3, as areas having special scenic significance requiring the imposition of project-specific development standards designed to protect these scenic areas (refer to Figure 4, Scenic Areas [incorporated herein as Figure 4.1-1]).

  Development standards for such special scenic significance areas shall include, but not be limited to, special siting and design criteria including height and story limitations, bulk and scale limitations, screening and landscaping requirements, natural materials and color requirements,

minimizing lighting that spills into nighttime public views, avoiding glares from windows and reflective surfaces, requirements to prepare landscaping plans utilizing drought tolerant and native plants that protect and enhance scenic resources; minimizing land coverage, grading, and structure height; and maximizing setbacks from adjacent open space areas. Clustering to maximize open space views may also be considered.

Development within visually prominent settings, including those identified on Figure 4 [incorporated herein as Figure 4.1-1], and on all parcels that abut Ocean View Boulevard and Sunset Drive, shall be sited and designed to avoid blocking or having a significant adverse impact on significant public views, including by situating buildings, access roads, and related development in a manner and configuration that maximizes public viewshed protection, and through such measures as height and story limitations, and bulk and scale limitations. Clustering development to maximize open space views may also be considered.

- **Policy SCE-8.** The City will encourage redevelopment, rehabilitation, or relocation of existing structures in scenic view areas to improve visual appearance and to attract visitors to the City's coastline.
- **Policy SCE-9.** Trees that are a visually integral part of the coastline and contribute to the scenic views in the Coastal Zone shall be protected or, when necessary to remove, including due to disease or danger to existing structures, replanted to ensure their continued scenic utility.
- **Policy DES-1.** All new development shall be consistent with requirements of the certified Local Coastal Program, including the certified Land Use Designations figure.
- **Policy DES-3.** The height limit for commercial development in Land Use Plan Areas I and III will vary, but in no case shall structures be more than 40 feet high. Minor exceptions to such height limit may be allowed for mechanical appurtenances that do not impact public views. Detached commercial signs shall be of a size, location, and appearance such that they do not detract from the area's scenic qualities and cause visual clutter and blight.
- **Policy DES-4.** Development standards for scenic areas, including those identified in Figure 4, [incorporated herein as Figure 4.1-1] shall minimize land coverage, grading, and structure height, and provide for setbacks from adjacent public open space areas.
- **Policy DES-6.** New lighting fixtures shall be mounted at low elevations and fully shielded to direct lighting downward, and away from the shoreline. Lighting along walkways should be mounted on low bollards or ground buttons. Lighting shall be focused on targeted use areas, and floodlighting shall be prohibited. Exterior lighting fixtures should complement the architectural style of structures. Lighting shall be limited to that necessary to provide for public safety, and shall be sited and designed to limit glares and light spill off-site.

Forest Hill Specific Plan

The Forest Hill Specific Plan, adopted in 1998, supplements the General Plan and provides additional policy direction for development in the existing commercial area at the southern boundary of the city limits (City of Pacific Grove 1998). The area represents about one quarter of the commercial land area available in Pacific Grove and is one of two entrances to the City. The Specific Plan sets forth and implements design review process criteria and Building and Site Design Guidelines for the Forest Hill Commercial Area to provide direction for the appearance and function of development along Forest Avenue. In addition, the plan includes policies that seek to protect, maintain, and enhance the visual character of the Forest Hill Specific Plan area. Relevant policies are included below.

- **Policy 2.1.** Maintain significant natural and topographical features as valuable physical and visual resources.
- **Policy 2.2**. Preserve buildings and sites of architectural and historical merit.
- **Policy 2.3**. Encourage development to conform to natural contours and to reduce the amount of grading needed.
- **Policy 2.5.** Avoid development that conflicts with water use policies and view shed protection.
- **Policy 2.7**. Maintain a harmonious relationship between commercial development and the surrounding natural and constructed (residential) environment.
- **Policy 3.1**. Enhance and unify the appearance of Forest Avenue with new street trees, street furniture, medians, and other streetscape improvements, as appropriate.
- **Policy 3.2.** Create a defined street edge and narrow the perceived width of Forest Avenue with street trees, sidewalks, buildings placed close to the street, and other streetscape amenities, as appropriate.
- **Policy 3.3.** Adopt guidelines for development along Forest Avenue that will improve the appearance of the streetfront for motorists and pedestrians, diminish the view of parked cars, and improve the visual interest and appearance of buildings, and diminish the overall image of asphalt along Forest Avenue.
- **Policy 3.8.** Create a gateway at the south end of the Forest Hill Commercial Area welcoming people to the City of Pacific Grove.
- **Policy 3.12.** Develop a "rear buffer" treatment at the rear of commercial properties that back up to residential uses that diminishes noise, glare, and other nuisances that can disturb residents.

The Forest Hill Specific Plan also provides restrictions on light, including, "Lighting (whether mounted on buildings or free-standing) should not create glare into adjacent residential property. Cut-off light fixtures should be used to direct light away from residences."

Pacific Grove Municipal Code

Pacific Grove Municipal Code Chapter 23.90 implements the LUP. Ordinance 23.90.160 provides development requirements which protect scenic resources and visual character within scenic areas, such as enforcing site-specific visual analysis, exterior lighting plans, and landscaping plans. Site-specific visual analysis would include identification of public views, development height, areas of tree or vegetation removal, architectural materials, and visual simulations to minimize development impacts on scenic views and visual resources. As part of a lighting plan, lighting must be designed to minimize light spill, and use shielded or downward-facing fixtures; ensure lighting is minimally visible from coastal beaches, bluffs, and offshore locations; and ensure anti-reflective and anti-glare finishes are used for elevations visible from public viewpoints. Landscape plans would include specifications for landscaping that may impact public views and ensure that plantings do not encroach on public views; obstruct public views to and of the ocean and shoreline; are consistent and blend with natural surroundings; and are drought tolerant. As part of the landscape plan, trees that contribute to the scenic coastal character should be retained.

Pacific Grove Municipal Code Chapter 23.42 designates the Open Space or "O" District to provide a special zone for those areas which are set aside for scenic vistas, forest preserves, public recreational, waterfront, or beach areas, public parks, or similar open space. Chapter 23.70 establishes procedures for City site plan review and architectural review to protect and enhance visual character in the community. Chapter 23.76 establishes historic evaluation criteria and

requirements related to historic preservation within Pacific Grove, including those to enhance and maintain the aesthetic character of historic structures. Chapter 20 establishes limitations on illuminated signage to minimize excessive light and glare.

Trees and the Urban Forest

Pacific Grove Municipal Code Section 12.20.020(a) designates five categories of protected trees:

1. All native trees, including Monterey cypress and Monterey pine trees that are six inches or greater in trunk diameter when measured at 54 inches above native grade, are protected trees.
2. All trees on private property 12 inches or greater in trunk diameter.
3. All trees in or within 100 yards of designated monarch butterfly sanctuaries. Designated monarch sanctuaries within the City include the Monarch Grove Sanctuary and George Washington Park.
4. All trees on public property 6 inches or greater in trunk diameter, and all Street Trees, regardless of size.
5. Designated trees, including all trees that are otherwise protected and will be impacted as a result of development, including pruning and impacts to critical root zones.

Substantial pruning or removal of any protected tree requires a permit. A tree removal permit application, fee, and written Tree Report, as specified in the Urban Forestry Standards, are required (Pacific Grove Municipal Code Section 12.60.010). Development permit applications including designated tree removal are required to include a tree resource assessment performed by a qualified professional, if deemed necessary by the City arborist (Pacific Grove Municipal Code Section 12.30.010).

City of Pacific Grove Site Plan Review Committee

The purpose of the Site Plan Review Committee (SPRC) is to encourage well-designed multifamily residential, commercial, and industrial development. The Pacific Grove Municipal Code outlines the roles and responsibilities of the SPRC and the review process in Section 23.70.050. The SPRC's review does not apply to single-family residences outside of the coastal zone, but studies the siting of proposed construction and its impact upon the existing topography and natural vegetation, and the relationship of proposed construction to existing public and private improvements in the immediate area. It does not act on architectural aspects (see Architectural Review Board, below). The SPRC encourages the elimination of unnecessary grading, and endeavors to retain the natural character of the site, including the preservation of trees.

The SPRC ensures that site plans conform to a logical plan of site development; have adequate parking facilities, driveways, entrances, and exits; provide an appropriate arrangement, location, and design of required open spaces and recreational facilities; and incorporate other pertinent project features, so that development will not be detrimental to vehicular or pedestrian traffic on adjacent streets, will provide adequate light and air, will provide adequate access for firefighting equipment and, in general, will provide a desirable and well-designed facility. The SPRC also reviews and approves lot line adjustments. The City Manager appoints staff to the SPRC, which consists of a chief planner, city engineer, fire chief, and chief building official, or their representatives (City of Pacific Grove 2025a). As stated in Pacific Grove Municipal Code Section 23.70.050(c), "the site plan review committee is the decision-making authority for reviews and comments on the following permits and activities: (1) Siting and lot coverage in the coastal zone. (2) Projects of $50,000 or

more. The SPRC shall review and comment on any structure or site work valued at $50,000 or more, as determined by the chief building official, including the structural alteration, or addition to, existing structures or works," and "no building permit shall be issued for structures subject to the provisions of this section until the SPRC has completed its deliberations."

City of Pacific Grove Architectural Review Board

The Architectural Review Board consists of five members, all of which have two or more years of professional experience in the building industry, architecture, landscape architecture, engineering, design, or drafting. The Board grants architectural approval where required by City zoning laws in order to promote the orderly and harmonious development of the City and to protect the City's architectural heritage. (City of Pacific Grove 2025b). The Board also performs other duties relating to architectural review services, such as those required by the General Plan (Urban Structure/Design Element Program A) to review and approve updates to the Architectural Review Guidelines for the City, including those for single-family residences (City of Pacific Grove 2017).

Pacific Gas and Electric Light-Emitting Diode Streetlight Upgrade Project

The City adopted the Pacific Gas and Electric (PG&E) Light-Emitting Diode (LED) Streetlight Upgrade Project in April 2018 as part of an energy efficiency incentive program sponsored by the U.S. Department of Energy and the California Public Utilities Commission. The Streetlight Upgrade Project replaced approximately 514 of the City's existing High Pressure Sodium streetlights with energy-efficient LED fixtures, with the purpose of reducing energy consumption; reducing greenhouse gas emissions and other air pollutants from non-renewable electrical generating facilities; reducing operational costs; avoiding the use of toxic substances, such as mercury and lead, which are contained in some other types of light fixtures; aiming fixtures downward to specifically illuminate defined areas on the ground; and include shielding as needed in order to reduce glare on adjacent properties (City of Pacific Grove 2018a, 2018b). The Streetlight Upgrade Project's implementation of shielded fixtures with focused illumination achieved the General Plan's Urban Structure/Design Element Program L to develop a street lighting program with emphasis on aesthetics and minimizing glare.

4.1.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The assessment of aesthetic impacts involves qualitative analysis that is informed by the goals of applicable land use plans and generally accepted, industry-wide design standards. Different viewers react to views and aesthetic conditions differently, and this analysis considers the existing character of the city and the goal to weave together the visual character of the landscape, the current development, and new development to account for the visual aspects of Pacific Grove that make it unique and provide a "sense of place" for residents and visitors. This section evaluates the anticipated changes to the city's visual environment that could result from buildout of the proposed project, based on the goals, policies, and characterizations of aesthetic resources in the 1994 Pacific Grove General Plan and the 2020 LCP. It is important to underscore that the proposed project does not contain specific development proposals, but sets goals and policies that will guide projects as they are conceived, proposed, and implemented. This analysis therefore focuses on land use

changes envisioned under the proposed project, and the aesthetic impacts in terms of the arrangement of built development and open space; density and intensity of development; and height, massing, and other key aspects that define aesthetic environmental concerns, according to the thresholds of significance discussed below. This evaluation is limited to public views, as impacts to private views do not constitute an environmental impact under CEQA. Photographs of the city were reviewed in preparation of this analysis, along with Google Earth imagery and other online visual sources.

Scenic Vistas and Scenic Resources

The evaluation of potential impacts to scenic vistas and scenic resources is based on review of the project area and surrounding environment. In determining the level of significance, this analysis focuses on the nature and magnitude of visual change in relationship to scenic vistas and scenic resources, the number of public vantage points from where this change would be visible, and the number of viewers who would be affected by this change. In addition, this analysis considers viewer sensitivity as a function of the visibility of resources in the landscape, the proximity of the viewers to the visual resource, elevation of the viewers relative to the visual resource, frequency and duration of views, numbers of viewers, and types and expectations of individuals and viewer groups.

Visual Character

Public Resources Code Section 21071 defines an urbanized area as:

1. An incorporated city that has either:
    a. A population of at least 100,000 persons, or
    b. A population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.
2. An unincorporated area that is both:
    a. Completely surrounded by one or more incorporated cities and both of the following criteria are met:
        i. The population of the unincorporated area and the population of the surrounding incorporated city or cities equals at least 100,000 persons
        ii. The population density of the unincorporated area at least equals the population density of the surrounding city or cities.
    b. Located within an urban growth boundary and has an existing residential population of at least 5,000 persons per square mile. For purposes of this subparagraph, an “urban growth boundary” means a provision of a locally adopted general plan that allows urban uses on one side of the boundary and prohibits urban uses on the other side.

Pursuant to Public Resources Code Section 21071, Pacific Grove is in a non-urbanized area because the City has a population of 14,966, which, even when combined with the population of the contiguous cities of Monterey (27,106) and Seaside (30,197) does not meet the population requirements (100,000) for an urbanized area (California Department of Finance 2024). Impacts on visual character or quality are evaluated relative to visual conditions under buildout, as determined by existing experiences from public viewpoints in and around the project area. Given that the proposed project would facilitate development in a non-urbanized area, the impact discussion of visual character and views is focused on degradation of the existing visual character or quality of public views of the project area and its surroundings.

Light and Glare

The analysis of light and glare impacts focuses on the nature and magnitude of changes in light and glare conditions associated with implementation of the proposed project on the project area and surroundings. If proposed and existing light and glare conditions are similar, then the visual compatibility would be high. If the proposed light and glare conditions strongly contrast with existing light and glare conditions or conflict with applicable policies and guidelines, then light and glare compatibility would be low, and significant impacts may result.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on aesthetics if it would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially damage scenic resources, including, but not limited to, unique mature trees, unique rock outcroppings, and historic buildings within a State scenic highway;
3. Substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that 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; and/or
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project have a substantial adverse effect on a scenic vista?

Impact AES-1 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD FACILITATE THE DEVELOPMENT OF NEW STRUCTURES THAT COULD AFFECT SCENIC VISTAS IN THE PROJECT AREA. HOWEVER, COMPLIANCE WITH THE POLICIES IN THE PROPOSED OBJECTIVE DESIGN STANDARDS AND THE PACIFIC GROVE GENERAL PLAN, LCP, AND MUNICIPAL CODE WOULD ENSURE THE PROTECTION OF SCENIC VISTAS. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project could be visible from scenic viewpoints and scenic view areas identified in Section 4.1.1, *Setting,* and the vistas they provide. The proposed project area is largely located outside of the Coastal Zone and inland of Ocean View Boulevard, which contains the majority of scenic resources identified in the LCP. However, the Downtown District; Central-Eardley Commercial District; Sunset Service Commercial District; Dennett, Sinex, and Grove Acre Neighborhood; Site 52; and Site 53 are located within viewing distance of scenic areas identified in the LCP, and thereby future development of these sites would have the potential to disrupt scenic vistas at these locations (see Figure 4.1-1).

The project would facilitate the addition of up to 2,335 new dwelling units and up to 292,578 square feet in commercial development in Pacific Grove. As discussed in Chapter 2, *Project Description*, projected growth would occur primarily as either infill redevelopment on underutilized land or on vacant land available for development within the project area. The project includes rezoning and increasing the maximum allowed development density (or "upzoning") of all parcels in the city zoned as C-D, C-FH, C-1, and C-2 that are outside the Coastal Zone. The proposed zoning amendments would also include revisions to development standards, including parking and height

regulations, in relation to higher density housing. Increased allowed building heights could potentially block views of scenic vistas. However, development facilitated by the project would be required to adhere to the City's Municipal Code, Chapter 23.90, which implements the LUP and its policies to protect and enhance public views to and along the shoreline and preserve scenic qualities within scenic areas and the Coastal Zone.

As a part of the proposed zoning changes, the City would develop and implement objective design standards for multi-family residential and mixed-use development. Objective design standards, as opposed to subjective design standards, are defined under state law as standards that involve no personal or subjective judgement by a public official and standards that can be verified by referencing established criteria. An example of an objective design standard is "primary colors shall be used on the majority of the building surface." This is different than a subjective design standard, which could be "colors of the building surface shall be consistent with existing development." The latter, subjective design standard would require judgement from a public official, whereas the use of primary colors on the building surface can be objectively verified by both the public official and the development applicant. The objective design standards would regulate aesthetic features of future development, including but not limited to architectural style and design features; building placement, form, and massing; open space amenity types; parking placement, and screening. The intent of the objective design standards is to allow flexibility and creativity in design, while also providing a clear set of standards and design expectations for multi-family residential, and other eligible housing types permitted by-right in certain zones.

Future development facilitated by the proposed project would be required to address potential visual impacts on a project-by-project basis through the City's design review process, in accordance with the proposed objective design standards (if adopted) as well as any analysis of aesthetic and visual impacts that may be required by CEQA for future discretionary projects. As part of the City's design review, the Architectural Review Board, SPRC, and/or other City departments would individually review specific development plans to ensure consistency with the City's Architectural Review Guidelines and Municipal Code, and the City's General Plan goals related to preservation of public scenic views prior to the issuance of building permits.

While the project does not propose specific development projects, development and redevelopment facilitated by the project would potentially have a substantial impact on public views of scenic vistas. However, development and redevelopment facilitated by the project would be governed by the policies, rules, and regulations listed above, as well as objective design standards contained in the proposed project, which would be applied and enforced through the City's standard development review procedures that concern the protection of public views or scenic vistas. Impacts to scenic vistas, including scenic routes and corridors, would therefore be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-2 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD RESULT IN THE LOSS OF SCENIC MATURE TREES IN PACIFIC GROVE AND COULD INVOLVE DEMOLITION OR ALTERATION OF HISTORIC BUILDINGS WITH SCENIC VALUE ALONG SR-68. COMPLIANCE WITH THE PROPOSED OBJECTIVE DESIGN STANDARDS, AND THE POLICIES THE PACIFIC GROVE GENERAL PLAN, LCP, AND MUNICIPAL CODE WOULD ENSURE THE PROTECTION OF SCENIC RESOURCES ALONG SR-68. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.1.1, the only state-designated scenic highway in the vicinity of the project area is SR-1, which is located at least 1.75 miles southeast of the City of Pacific Grove (Caltrans 2019). Due to distance, topography, and other intervening features (i.e. vegetation), no views of development facilitated by the project would be visible from SR-1. Therefore, no impacts to scenic resources within SR-1 would occur.

SR-68 is eligible for state scenic highway designation, but has not been officially designated (Caltrans 2019). SR-68 is considered one of the main entrances to the city from the south (City of Pacific Grove 1994). Views along SR-68 include passage through and views of the Monterey pine forest leading into Pacific Grove. As shown in Figure 2-3 in Chapter 2, *Project Description,* SR-68 traverses through the Forest Hill Neighborhood and passes adjacent to the Presidio-Austin Commercial District, Neighborhood Commercial District, and Sunset Service Commercial District. These areas include housing sites identified for rezoning and upzoning by the proposed project and would have potential impacts to scenic resources visible from SR-68, such as those resulting from tree removal.

Mature trees are prominent along SR-68, particularly at the City's southern gateway (see Figure 4.1-2a, Photograph 1). Trees protected by the Pacific Grove Municipal Code (Chapter 12.20, *Protected Trees*) occur throughout the project area and may occur at many individual sites. Specifically, established Monterey pine forest is present in the Sunset Service Commercial District at Site 49. The Municipal Code includes tree removal and protection requirements, including permitting, and root zone protection. Removal of protected trees must not result in less than a total canopy cover of 33 percent on the property; if the canopy cover would be reduced below the City's canopy cover target, the protected tree would require tree replacement. Compliance with these regulations would ensure the project would not result in significant visual impacts related to the removal of trees. Additionally, numerous historic resources are present within the city, and historic buildings may be present on identified housing sites, upzoning areas, and additional parcels. As detailed in Section 4.4, *Cultural Resources*, development facilitated by the project has the potential to significantly impact historic resources. Specific development projects facilitated by the project would be required to adhere to the historic preservation regulations set forth by the City, including those described in the City's Architectural Review Guidelines, Municipal Code, General Plan and LCP, and the Secretary of the Interior's Standards. With conformance to these requirements and implementation of Mitigation Measure CUL-1, requiring a Historical Resources Evaluation, project impacts to historic resources would be less than significant with mitigation (see Section 4.4, *Cultural Resources*). Therefore, impacts to trees, rock outcroppings, and historic buildings along SR-68 would be less than significant.

Although SR-68 is not an officially-designated state scenic highway, future development within view of SR-68 would continue to be required to adhere to the goals and policies of the City's General Plan (including Policy 9 of the Land Use Element, Policy 3 of the Urban Structure and Design Element, and Policy 4 of the Parks and Recreation Element) and LCP, including those which provide regulated

protection of scenic and historic resources, preservation of public views, and visual consistency with existing development and community character, and guide community design. Furthermore, future development facilitated by the proposed project would be required to address potential visual impacts on a project-by-project basis through the City's design review process, in accordance with Chapter 23.70 of the Municipal Code as well as any analysis of aesthetic and visual impacts that may be required by CEQA for future discretionary projects. As part of the City's design review, the Architectural Review Board, SPRC, and/or other City departments would individually review specific development plans to ensure consistency with the City's Architectural Review Guidelines and Municipal Code, and the City's General Plan and LCP goals related to preservation of scenic resources, including trees and public views. Through the City's design review, building permits would not be issued until the Architectural Review Board, SPRC, and/or other City departments complete their reviews, thus ensuring that specific development projects would have less than significant impacts to scenic resources (such as trees and public views).

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-3 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD FACILITATE HOUSING DEVELOPMENT AND WOULD CHANGE DEVELOPMENT STANDARDS INCLUDING RESIDENTIAL DENSITY, BUILDING HEIGHTS, ALLOWED USES, AND PARKING REQUIREMENTS. HOWEVER, VISUAL CHARACTER AND SCENIC QUALITY WOULD BE PROTECTED THROUGH ADHERENCE TO CITY DESIGN GUIDELINES AND IMPLEMENTATION OF GOALS AND POLICIES IN THE CITY'S GENERAL PLAN, LCP, AND MUNICIPAL CODE THAT ADDRESS VISUAL CHARACTER AND QUALITY OF PUBLIC VIEWS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed above in Section 4.1.3(a), *Methodology and Significance Thresholds*, Pacific Grove is in a non-urbanized area as defined by CEQA. Therefore, this analysis considers whether the proposed project would substantially degrade the existing visual character or quality of public views of the project area and its surroundings. As discussed in Section 4.1.1, *Visual Character*, the City of Pacific Grove is characterized as an established coastal community, primarily developed with residential neighborhoods and distinct historic architecture and characterized by its proximity to the coastline and availability of public views of, and access to, the coastline.

As described under Impact AES-1, scenic views within the project area include high quality public views, such as views of the shoreline free of encroachment. Proposed housing sites, upzone, and rezone parcels (specifically those in the Downtown District; Central-Eardley Commercial District; Sunset Service Commercial District; Dennett, Sinex, and Grove Acre Neighborhood; Site 52; and Site 53) are located within viewing distance of scenic areas identified in the LCP. Development facilitated by the proposed project would have the potential to impact public views at these locations (see Figure 4.1-1). Development facilitated by the proposed project would be required to adhere to Chapter 23.90 of the City's Municipal Code, which implements the LUP and its policies to protect and enhance public views to and along the shoreline and preserve scenic qualities within scenic areas and the Coastal Zone.

The proposed project would facilitate development on previously undeveloped parcels and would modify the development potential and standards, including rezoning or upzoning for increased residential density, implementing objective design standards for multi-family residential and mixed-use development, and facilitate the development of affordable housing in compliance with state law. The development of these areas would change the visual character of the community, including the scale of the built environment. Despite intensifying the urban character of the city, new development facilitated by the proposed project would not have a substantial adverse effect on visual character or quality. To the contrary, guided development would support enhancements to the built environment in keeping with the existing character, and it is anticipated that the gradual redevelopment and development of vacant and underutilized sites would improve the visual quality of the built environment.

As a part of the proposed zoning changes, the City would develop and implement objective design standards for multi-family residential and mixed-use development. Objective design standards, as opposed to subjective design standards, are defined under state law as standards that involve no personal or subjective judgement by a public official and standards that can be verified by referencing established criteria. An example of an objective design standard is “primary colors shall be used on the majority of the building surface.” This is different than a subjective design standard, which could be “colors of the building surface shall be consistent with existing development.” The latter, subjective design standard would require judgement from a public official, whereas the use of primary colors on the building surface can be objectively verified by both the public official and the development applicant. The objective design standards would regulate aesthetic features of future development, including but not limited to architectural style and design features; building placement, form, and massing; open space amenity types; parking placement, and screening. The intent of the objective design standards is to allow flexibility and creativity in design, while also providing a clear set of standards and design expectations for multi-family residential, and other eligible housing types permitted by-right in certain zones.

The proposed objective design standards would include revisions to the maximum allowable height and site coverage allowance of several zoning districts, revisions to the minimum open space and yard size requirements of several zoning districts, and revisions to residential and commercial parking dimensions and parking requirements. The proposed objective design standards would allow for the upzoning needed to accommodate increased densities and meet the Regional Housing Needs Allocation. Pursuant to Senate Bill 330, new design standards established on or after January 1, 2020 must be objective. Therefore, while the new design standards would be developed to be objective, they would also be developed consistent with the Pacific Grove General Plan objectives and Municipal Code regulations related to enhancement and preservation of visual character. Changes to other design standards would be minimal and would only occur as necessary to allow the densities envisioned by the Housing Element.

Under the proposed project, development in the project area would be required to comply with new objective design standards, as implemented through the City’s design review process. Although the objective design standards would alter the City’s current design review process and would supersede existing standards used to assess development design, the objective design standards would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Development facilitated by the project would still be subject to design standards established by the City that, while objective, would be intended to guide future development, preserve and enhance the visual character of the city, and to ensure compatibility with existing land uses. These updated standards and guidelines would ensure the implementation of high-quality development that is cohesive and consistent with the existing visual character of the city.

Trees protected by the City's Municipal Code (Chapter 12.20, *Protected Trees*) occur throughout the project area and may occur at many of the sites. Specifically, established Monterey pine forest is present in the Sunset Service Commercial District at Site 49. The Municipal Code includes tree removal and protection requirements, including permitting, and root zone protection. Removal of protected trees must not result in less than a total canopy cover of 33 percent on the property; if the canopy cover would be reduced below the City's canopy cover target, the protected tree would require tree replacement. Compliance with these regulations would ensure the project would not result in significant visual impacts related to degradation of public views or visual character resulting from the removal of trees.

Development facilitated by the project would comply with the goals and policies of the Pacific Grove General Plan to ensure consistency with regulations governing visual quality and character. Pacific Grove General Plan Land Use Element Policy 9 preserves public view corridors and includes Program E which adopts land division standards that will retain the scale and character of the City; LCP Policies SCE-1 and SCE-2 protect and enhance public views and limit development that could adversely impact public views and scenic coastal areas; and LCP Policy SCE-4 designates the areas in Figure 4.1-1 as areas of special scenic significance and would protect the visual quality and character of these areas as a resource of public importance by implementing development standards which require compatible development and maximizing viewshed protection. Furthermore, development facilitated by the project would be required to address potential visual impacts on a project-by-project basis through the City's design review process in accordance with Chapter 23.70 of the Municipal Code as well as any analysis of any aesthetic and visual impacts that may be required by CEQA for future discretionary projects. As part of the City's design review, the Architectural Review Board, SPRC, and/or other City departments would individually review specific development plans to ensure consistency with the City's Architectural Review Guidelines and Municipal Code, and the City's General Plan goals related to preservation of public views and visual character prior to the issuance of building permits.

Development facilitated by the proposed project would result in visual changes to the community. However, adherence to City design standards and review processes, General Plan and LCP goals and policies, and Pacific Grove Municipal Code requirements would ensure that future development of high visual quality and is visually coherent with the existing character of the city and surrounding development. Therefore, development facilitated by the project would not degrade the existing visual character or quality of public views of the project area and its surroundings. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 4:	Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-4 DEVELOPMENT FACILITATED BY THE PROJECT COULD CREATE NEW SOURCES OF LIGHT AND GLARE; HOWEVER, THE CITY'S MUNICIPAL CODE REGULATES LIGHTING AND GLARE THROUGHOUT THE CITY. THEREFORE, POTENTIAL IMPACTS ON DAYTIME OR NIGHTTIME VIEWS RESULTING FROM THE INTRODUCTION OF NEW LIGHT OR GLARE SOURCES WOULD BE LESS THAN SIGNIFICANT.

Most of the project area is already developed, and ambient light from urban uses already exists. Existing sources of light and glare are consistent with urban development and include, but are not

limited to, car headlights, streetlights, exterior building lighting, lighted signs, and reflective surfaces such as vehicles and building windows.

Sensitive light and glare receptors include residences proximate to the proposed housing sites, upzoning areas, and additional parcels. Development facilitated by the project could create new sources of light from exterior building illumination and outdoor lighting, including vehicular traffic, and glare from reflective building surfaces and vehicle surfaces. As a result, these new sources of light or glare could affect adjacent light-sensitive land uses. Areas that would experience the greatest potential for increased lighting are those located proximate to areas likely to experience the greatest development potential.

As discussed in Section 4.1.2, *Regulatory Setting*, the City's development guidelines and Municipal Code provide lighting regulations, with which future development would be required to comply. Examples of these standards include Section 23.90.160, which requires lighting to be cut-off, shielded, or downward facing, and restricts bulbs to 60 watts (or equivalent); and the Forest Hill Specific Plan, which requires lighting to be directed away from residences and minimize glare into adjacent properties.

Future development facilitated by the project would be required to address potential light and glare impacts on a project-by-project basis through the City's design review process, including Architectural Design Review, Site Plan Review, and design review in accordance with Chapter 23.70 of the Municipal Code as well as through an analysis of aesthetic and visual impacts that may be required by CEQA for future discretionary projects. During design review, building materials and structural finishes would be reviewed to ensure consistency with the vision for the city. The Architectural Review Board, SPRC, and/or other City departments would individually review specific development plans to ensure consistency with the City's Architectural Review Guidelines, Pacific Grove Municipal Code, and the General Plan goals prior to the issuance of building permits. Accordingly, highly reflective materials capable of generating substantial amounts of glare would be avoided in development. Some reflective material could be unavoidable, such as glass used in windows of new buildings; increased building density and allowed building heights would increase these sources of glare. However, glare from building windows would be similar to and consistent with existing conditions in the project area, and the City's design review and approval processes would ensure that sources of potential glare would be minimized.

For all the reasons discussed above, the proposed project would not create new sources of substantial light or glare that would adversely affect day or nighttime views in the area, and this impact would be less than significant.

Mitigation Measures

No mitigation is required.

4.1.4 Cumulative Impacts

The geographic scope for cumulative aesthetic impacts is the entirety of Pacific Grove, adjacent unincorporated areas (including the Del Monte Forest and Pebble Beach), and the City of Monterey. This geographic scope is appropriate because views beyond one mile of the housing sites, upzoning areas, and additional parcels would not be easily seen given the topography of the area, and due to surrounding development obstructing views in all directions from the housing sites and upzoning areas. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact aesthetics.

Buildout of cumulative projects would have limited, site-specific impacts on public viewsheds and scenic vistas throughout the project area due to intervening features (i.e. topography, vegetation, and buildings) largely obscuring scenic resources in the area. Most of the cumulative projects would not result in substantial impacts to public viewsheds or scenic vistas given the proposed massing and heights of structures, or the proposed locations within developed areas with comparable structures. Cumulative projects would undergo design review and/or environmental review to mitigate adverse effects to scenic vistas to the extent feasible. Cumulative adverse impacts to scenic vistas (Threshold 1) would be less than significant.

SR-1 is the only state scenic highway in the vicinity of the project area, and SR-68 is listed as an eligible state scenic highway but has not been designated. Compliance with applicable General Plan policies (including Policy 9 of the Land Use Element, Policy 3 of the Urban Structure and Design Element, and Policy 4 of the Parks and Recreation Element), LCP policies, and Municipal Code requirements would ensure that cumulative development projects do not adversely affect or damage scenic resources that are visible from a state scenic highway. Discretionary projects would also undergo environmental and design review, including consideration of whether the projects would affect visual resources within a state scenic highway. Cumulative adverse impacts to scenic resources within a state scenic highway (Threshold 2) would be less than significant.

The visual character of Pacific Grove is protected through the City's zoning, development regulations, General Plan and LCP policies, and design review process. Compliance with applicable General Plan, LCP, and Municipal Code policies would ensure that cumulative development projects do not substantially impact the existing visual character of the community or the quality of public views. Discretionary projects would also undergo environmental and design review, including consideration of whether the projects would substantially degrade the existing visual character or quality of public views of a given site and its surroundings. Cumulative impacts related to visual character and the quality of public views (Threshold 3) would be less than significant.

An increase in light and glare, and associated adverse effects to daytime or nighttime views, could be cumulatively considerable as the cumulative projects area continues to be built out. Cumulative projects would be required to undergo individual design review, and regulations that govern light and glare would apply to cumulative projects, which would ensure adherence to applicable General Plan and Municipal Code standards related to reducing sources of light and glare. Compliance with applicable General Plan, LCP, and Municipal Code policies would minimize the creation of any substantial new sources of light and glare in the region from cumulative development projects. Cumulative impacts associated with new sources of light and glare (Threshold 4) would be less than significant.

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4.2 Air Quality

This section analyzes air quality related impacts associated with development facilitated by the project, including temporary air quality impacts relating to construction activity and long-term air quality impacts from operation. Construction and operational emissions associated with development facilitated by the project were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1. Vehicle miles traveled (VMT) for both existing conditions and buildout of the proposed project were provided by Kimley-Horn in the Transportation Memorandum (Appendix E), as detailed in Section 4.14, *Transportation.* Greenhouse gas emissions and global climate change impacts are discussed in Section 4.7, *Greenhouse Gas Emissions*.

4.2.1 Setting

a. Regional Climate and Meteorology

The project area is located within the North Central Coast Air Basin (NCCAB), which includes Monterey, San Benito, and Santa Cruz counties. The NCCAB, which is the geographic scope for this analysis, includes an area of approximately 5,159 square miles along the central coast of California. The Diablo Range marks the northeastern boundary and, together with the southern extent of the Santa Cruz Mountains, forms the Santa Clara Valley, which extends into the northeastern tip of the NCCAB. Further south, the Santa Clara Valley transitions into the San Benito Valley, which runs northwest to southeast and has the Gabilan Range as its western boundary. To the west of the Gabilan Range is the Salinas Valley, which extends from Salinas at its northwestern end to King City at its southeastern end.

The semi-permanent high-pressure cell in the eastern Pacific is the basic controlling factor in the climate of the NCCAB. In the summer, the high-pressure cell is dominant and causes persistent west and northwest winds over the entire California coast. Air descends in the Pacific High-pressure cell, forming a stable temperature inversion of hot air over a layer of cool coastal air. The onshore air currents pass over cool ocean waters to bring fog and relatively cool air into the coastal valleys. The warmer air loft acts as a lid to inhibit vertical air movements (Monterey Bay Air Resources District [MBARD] 2008).

The mountainous ridges within NCCAB tend to restrict and channel the summer onshore air currents. Surface heating in the interior portion of the Salinas and San Benito Valleys creates a weak low-pressure system which intensifies the onshore air flow during the afternoon and evening. In the fall, the surface winds become weak, and the marine layer grows shallow, dissipating altogether on some days. The air flow is occasionally reversed in a weak offshore movement, and the relatively stationary air mass is held in place by the Pacific High-pressure cell, which allows pollutants to build up over a period of a few days. It is most often during this season that north or east winds develop to transport pollutants from either the San Francisco Bay Area or the Central Valley into the NCCAB (MBARD 2008).

During the winter, the Pacific High-pressure cell migrates southward and has less influence on the NCCAB. Air frequently flows in a southeasterly direction out of the Salinas and San Benito Valleys, especially during night and morning hours. Northwest winds are nevertheless still dominant in winter, but easterly flow is more frequent. The general absence of deep, persistent inversions and the occasional storm systems usually result in good air quality for the NCCAB in winter and early spring (MBARD 2008).

The project area has a Mediterranean climate with moderate, dry summers. The warmest month of the year is September, and the coldest month of the year is January. The annual average maximum temperature is 65.0 degrees Fahrenheit, while the annual average minimum temperature is 48.0 degrees Fahrenheit. Rainfall is concentrated in the winter months. Local climate conditions are summarized below in Table 4.2-1**.**

Table 4.2-1 Project Area Climate Conditions

Temperature Condition	Amount
Average annual rainfall	19.73 inches
Annual average maximum temperature	65.0°F
Annual average minimum temperature	48.0°F
Warmest month	September
Coolest month	January

°F = degrees Fahrenheit

Note: Averages are based on the period of record from March 1, 1906, to April 30, 2016, at Monterey, California west of the project area.

Source: Western Regional Climate Center 2016

b. Air Pollutants of Primary Concern

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack). The federal and state Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory) into the atmosphere, including carbon monoxide, volatile organic compounds (VOC)/reactive organic gases (ROG),[1] nitrogen oxides (NO_X), particulate matter with diameters of up to ten microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), sulfur dioxide (SO_2), and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The following subsections describe the characteristics, sources, and health and atmospheric effects of the air pollutants of primary concern.

Ozone

Ozone (O_3) is a highly oxidative unstable gas produced by a photochemical reaction (triggered by sunlight) between ROG and NO_X. ROG is composed of non-methane hydrocarbons (with specific exclusions), and NO_X is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and NO_2. ROG is formed during the combustion and evaporation of organic solvents, while NO_X is formed during the combustion of fuels. As a highly reactive molecule, O_3 readily combines with many different atmosphere components. Consequently, high O_3 levels tend to exist only while high ROG and NO_X levels are present to sustain the O_3 formation process. Once

[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term ROG is used in this analysis.

the precursors have been depleted, O_3 levels rapidly decline. Because these reactions occur on a regional rather than local scale, O_3 is considered a regional pollutant. In addition, because O_3 requires sunlight to form, it mainly occurs in concentrations considered serious in times of the year with longer days and more sunlight, generally between April and October. People most at risk from O_3 include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers. In addition, people with reduced intake of certain nutrients, such as vitamins C and E, are at greater risk from O_3 exposure. Depending on the level of exposure, O_3 can cause coughing and a sore or scratchy throat; make it more difficult to breathe deeply and vigorously and cause pain when taking a deep breath; inflame and damage the airways; make the lungs more susceptible to infection; aggravate lung diseases such as asthma, emphysema, and chronic bronchitis; and increase the frequency of asthma attacks (USEPA 2024a).

Carbon Monoxide

Carbon monoxide (CO) is a localized pollutant found in high concentrations only near its source. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic's incomplete combustion of petroleum fuels. Therefore, elevated concentrations are usually only found near areas of high vehicle traffic volumes. When CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability to get oxygenated blood to their hearts in situations where they need more oxygen than usual. As a result, they are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina (USEPA 2024b).

Nitrogen Dioxide

The primary sources of NO_x are internal combustion engine motor vehicles, industrial boilers, and furnaces. The principal form of NO_x produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2, commonly called NO_x. NO_2 is a reactive, oxidizing gas and an acute irritant capable of damaging cell linings in the respiratory tract. Breathing air with a high concentration of NO_2 can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma and children and the elderly are generally at greater risk for the health effects of NO_2. The nitrate particles that result from NO_X make the air hazy and difficult to see though. It can also contribute to the formation of O_3, smog, and acid rain (USEPA 2024c).

Sulfur Dioxide

Sulfur dioxide (SO_2) is the component of greatest concern and is used as the indicator for the larger group of gaseous sulfur oxides (SO_x). Other gaseous SO_x (such as SO_3) are found in the atmosphere at concentrations much lower than SO_2. The largest source of SO_2 in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities. Smaller sources of SO_2 emissions include: industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content. Short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult. People with asthma, particularly children, are sensitive to these effects of SO_2 (USEPA 2024d).

Particulate Matter

Suspended atmospheric PM_{10} and $PM_{2.5}$ are comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mist. Both PM_{10} and $PM_{2.5}$ are emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. The atmosphere, through chemical reactions, can form particulate matter. The characteristics, sources, and potential health effects of PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles. In contrast, $PM_{2.5}$ is generally associated with combustion processes and formation in the atmosphere as a secondary pollutant through chemical reactions. PM_{10} can cause increased respiratory disease, lung damage, cancer, premature death, reduced visibility, and surface soiling. For $PM_{2.5}$, short-term exposures (up to 24-hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases (CARB 2024a).

Lead

Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial. However, due to USEPA's regulatory efforts to remove Pb from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred before 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least partly due to national emissions standards for hazardous air pollutants (USEPA 2014). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest Pb level in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and Pb-acid battery manufacturers. Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system depending on exposure. Pb exposure also affects the oxygen-carrying capacity of the blood. The Pb effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to Pb exposures, contributing to behavioral problems, learning deficits, and lowered IQ (USEPA 2024e).

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, Toxic Air Contaminants (TAC) are a diverse group of airborne substances/air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about $1/70^{th}$ the diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2024a). TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are

described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2024f).

c. Current Air Quality

MBARD operates a network of air quality monitoring stations throughout the NCCAB. The nearest MBARD-operated monitoring station to the project area is the Salinas #3 air monitoring station, located approximately 16.3 miles northwest of the project area. The Salinas #3 station collected 1-hour and 8-hour O_3, NO_2, CO, and $PM_{2.5}$ concentrations from 2021 to 2023. There is no representative PM_{10} data near the project area.

Table 4.2-2 indicates the number of days that each of the federal and state standards has been exceeded at the Salinas #3 monitoring station near the project area in each of the last three years for which data is available. At this station, the federal $PM_{2.5}$ standard was exceeded in 2023. No other state or federal standards were exceeded at nearby monitoring stations.

Table 4.2-2 Annual Ambient Air Quality Data from Nearest Monitoring Station

Pollutant	2021	2022	2023
Ozone (ppm), Worst 1-Hour[1]	0.064	0.057	0.064
Number of days above CAAQS (>0.09 ppm)	0	0	0
Number of days above NAAQS (>0.12 ppm)	0	0	0
Ozone (ppm), Worst 8-Hour Average[1]	0.057	0.052	0.056
Number of days above CAAQS (>0.070 ppm)	0	0	0
Number of days above NAAQS (>0.070 ppm)	0	0	0
Carbon Monoxide (ppm), Highest 8-Hour Average[2]	1.3	1.3	0.8
Number of days above CAAQS or NAAQS (>9.0 ppm)	0	0	0
Nitrogen Dioxide (ppm), Worst 1-Hour[1]	0.027	0.030	0.031
Number of days above CAAQS (>0.180 ppm)	0	0	0
Number of days above NAAQS (>0.100 ppm)	0	0	0
Particulate Matter <2.5 microns (mg/m^3), Worst 24 Hours[1]	19.7	23.8	41.1
Number of days above NAAQS (>35 mg/m^3)	0	0	1

ppm = parts per million; µg/m^3 = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard

[1] Data sourced from CARB at the nearest monitoring station with available data at the Salinas #3 station in Salinas.

[2] Data sourced from USEPA at the nearest monitoring station with available data at the Salinas #3 station in Salinas.

Source: CARB 2024b and USEPA 2025

d. Sensitive Receptors in the Project Area

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with a margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14, the elderly (over the age of 65), people engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. According to MBARD (2008), sensitive receptors include residences, education resources, daycare centers, health care facilities, or other facilities with live-in housing, all of which are located throughout the project area.

4.2.2 Regulatory Setting

The federal CAA governs air quality in the United States. In addition to being subject to federal requirements, air quality in California is also governed by more stringent regulations under California CAA. At the federal level, USEPA administers the CAA. The CAA is administered by CARB at the state level and by air quality management districts at the regional and local levels. MBARD regulates air quality at the regional level, which includes the project area.

a. Federal and State Ambient Air Quality Standards

The federal and state governments have authority under the federal and state CAA to regulate emissions of airborne pollutants and have established ambient air quality standards (AAQS) for the protection of public health. An air quality standard is defined as "the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harming public health" (CARB 2024c). USEPA is the federal agency designated to administer air quality regulation, while CARB is the state equivalent in California. Federal and state AAQS have been established for six criteria pollutants: O_3, CO, NO_2, SO_2, $PM_{10,}$ $PM_{2.5}$, and lead. AAQS are designed to protect those segments of the public most susceptible to respiratory distress, such as children under the age of 14, the elderly (over the age of 65), persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases (USEPA 2024g). In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride (CARB 2024d). Table 4.2-3 lists the current NAAQS as well as the CAAQS for regulated pollutants.

Table 4.2-3 Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	NAAQS	CAAQS
Ozone	1-Hour	–	0.09 ppm
	8-Hour	0.070 ppm	0.070 ppm
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.030 ppm
	1-Hour	0.100 ppm	0.18 ppm
Sulfur Dioxide	Annual	–	–
	24-Hour	–	0.04 ppm
	1-Hour	0.075 ppm	0.25 ppm
PM_{10}	Annual	–	20 µg/m^3
	24-Hour	150 µg/m^3	50 µg/m^3
PM_{25}	Annual	9.0 µg/m^3	12 µg/m^3
	24-Hour	35 µg/m^3	–
Lead	30-Day Average	–	1.5 µg/m^3
	3-Month Average	0.15 µg/m^3	–

NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; ppm = parts per million; µg/m^3 = micrograms per cubic meter

Source: CARB 2024e and USEPA 2024g

USEPA and CARB designate air basins or portions of air basins and counties as being in "attainment" or "nonattainment" for each of the criteria pollutants. Areas that do not meet the AAQS standards are classified as nonattainment areas. The NAAQS (other than O_3, PM_{10}, $PM_{2.5}$, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. The NAAQS for O_3, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over one- to three-year periods, depending on the pollutant. The CAAQS are not to be exceeded during a three-year period. The attainment status for Monterey County is included in Table 4.2-4.

Whether an area meets the state and federal standards is based on air quality monitoring data. Areas that are unclassified have insufficient monitoring data for a specific pollutant to determine attainment or nonattainment status, although unclassified areas are typically treated as attainment for a specific pollutant. Since attainment and nonattainment designation is pollutant-specific, an area may be classified as nonattainment for one pollutant and attainment for another. Similarly, because the state and federal standards differ, an area could be classified as attainment for the federal standards of a pollutant and as nonattainment for the state standards of the same pollutant. The region is designated as a nonattainment area for the state standards for PM_{10} and attainment/unclassified for all other federal and state standards (CARB 2023).

Table 4.2-4 Attainment Status of Criteria Pollutants in Monterey County

Pollutant	State Designation	Federal Designation
O_3	Attainment	Attainment
PM_{10}	Nonattainment	Unclassified/Attainment
$PM_{2.5}$	Attainment	Attainment
CO	Attainment	Unclassified/Attainment
NO_2	Attainment	Unclassified/Attainment
SO_2	Attainment	Unclassified/Attainment

O_3 = Ozone; NO_2 = nitrogen dioxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns in diameter or less; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter.

Sources: CARB 2023

b. Federal Regulations

USEPA is responsible for enforcing the federal CAA and establishing the NAAQS. The NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. The agency has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission standards established by CARB.

Construction Equipment Fuel Efficiency Standard

USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

Energy Policy and Conservation Act

Enacted in 1975, the Energy Policy and Conservation Act legislation established fuel economy standards for new light-duty vehicles (autos, pickups, vans, and sport-utility vehicles). The law placed responsibility on the National Highway Traffic Safety Administration (NHTSA), a part of the U.S. Department of Transportation, for establishing and regularly updating vehicle standards. USEPA administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards. Since the inception of the program, the average fuel economy for new light-duty vehicles steadily increased from 13.1 miles per gallon for the 1975 model year to 24.4 miles per gallon for the 2024 model year.

On August 2, 2018, the NHTSA and USEPA, operating under the direction of the Trump Administration, proposed the Safer Affordable Fuel-Efficient Vehicles Rule Part One (SAFE I Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated in two parts as described below.

- Part One, "One National Program" (84 Federal Register 51310) revoked a waiver granted by USEPA to the State of California under Section 209 of the Clean Air Act to enforce more stringent emission standards for motor vehicles than those required by USEPA for the explicit purpose of GHG emission reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, potentially restricting the ability of the CARB to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California. The waiver was reissued in March 2022, and revoked again in May 2025.
- Part Two addressed CAFE standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposed new CAFE standards for model years 2022 through 2026 and amended existing CAFE standards for model year 2021. The proposal retained the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026. The proposal addressing CAFE standards was jointly developed by NHTSA and USEPA, with USEPA simultaneously proposing tailpipe carbon dioxide standards for the same vehicles covered by the same model years.

USEPA and NTHSA published final rules to amend and establish national carbon dioxide and fuel economy standards on April 30, 2020 (Part Two of the SAFE Vehicles Rule) (85 Federal Register 24174). On April 22, 2021, the Biden Administration formally proposed to roll back portions of the SAFE Rule, thereby restoring California's right to enforce more stringent fuel efficiency standards. Most recently, on December 21, 2021, the NHTSA finalized rules to repeal the SAFE I Rule. The final rule concludes the SAFE I Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important state and local interests. The final rule ensures the SAFE I Rule will no longer form an improper barrier to states exploring creative solutions to address their local communities' environmental and public health challenges.

On June 7, 2024, NHTSA issued new CAFE standards. In this final rule, fuel economy will increase by 2 percent per year for passenger cars with model years 2027 to 2031, and 2 percent per year for light-duty trucks with model years 2029 to 2031.

National Energy Policy Act

The National Energy Policy Act calls for programs that promote efficiency and the use of alternative fuels. The National Energy Policy Act requires certain federal, state, and local government and private fleets to purchase a percentage of light duty alternative fuel vehicles capable of running on alternative fuels each year. In addition, the National Energy Policy Act has financial incentives. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of alternative fuel vehicles. The National Energy Policy Act also requires states to consider a variety of incentive programs to help promote alternative fuel vehicles.

c. State Regulations

California Clean Air Act

The California CAA was enacted in 1988 (California Health & Safety Code (H&SC) Section 39000 et seq.). Under the California CAA, the state has developed the CAAQS, which are generally more stringent than the NAAQS. Table 4.2-3 lists the current state standards for regulated pollutants. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

California Air Toxics Program

A TAC is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health. TACs may result in long-term health effects such as cancer, birth defects, neurological damage, asthma, or genetic damage, or short-term acute effects such as eye watering, respiratory irritation, runny nose, throat pain, and headaches. TACs are considered either carcinogenic or non-carcinogenic based on the nature of the health effects associated with exposure.

In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California Senate Bill (SB) 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air quality monitoring network, and develop any additional air toxic control measures needed to protect children's health.

State Implementation Plan

The State Implementation Plan (SIP) is a collection of documents that set forth the state's strategies for achieving the NAAQS and CAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, and permitting), district rules, state regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to USEPA for approval and publication in the Federal Register. The items included in the California SIP are listed in the Code of Federal Regulations at 40 Code of Federal Regulations 52.220.

MBARD's *2012-2015 Air Quality Management Plan* (2012-2015 AQMP) is the document responsible for outlining strategies to meet air quality standards within the NCCAB. The 2012-2015 AQMP accommodates growth by projecting the growth in emissions based on different indicators.

Senate Bill 743

Senate Bill 743 (SB 743), signed into law in 2013, significantly changed how transportation impacts are evaluated under the California Environmental Quality Act (CEQA). Traditionally, transportation impacts were assessed based on the Level of Service metric, which focused on automobile delay and congestion. However, SB 743 introduced a shift towards using VMT as the primary metric. The main goals of SB 743 are to reduce greenhouse gas emissions and traffic-related air pollution, promote the development of a multimodal transportation system, and provide clean, efficient access to destinations. By focusing on VMT, SB 743 aims to encourage more sustainable land use and transportation planning, ultimately helping California achieve its climate and environmental goals.

California Accidental Release Prevention Program

The California Environmental Protection Agency oversees implementation of the California Accidental Release Prevention Program, which aims to prevent accidental releases of extremely hazardous substances that pose the greatest risk of harm to the public and the environment. The program requires certain facilities, referred to as "stationary sources," which handle, manufacture, use, or store any regulated substances above threshold quantities to take actions to proactively prevent and prepare for accidental releases. Facilities subject to the California Accidental Release Prevention Program requirements must submit a Risk Management Plan. The California Environmental Protection Agency oversees the implementation of this program at the state level and Certified Unified Program Agencies implement the program at the local level.

d. Regional and Local Regulations

Monterey Bay Air Resources District

MBARD is responsible for assuring that the federal and state ambient air quality standards are attained and maintained in the NCCAB. The agency is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and other activities.

In March 2017, MBARD adopted the 2012-2015 AQMP as an update to the 2012 AQMP. The 2012-2015 AQMP assesses and updates elements of the 2012 AQMP, including ambient air quality data, emission inventory trends, information on ozone transport, control measures, mobile source programs, emission reduction strategies, and growth forecasts. The 2012-2015 AQMP only addresses attainment of the state 8-hour ozone standard because in 2012, USEPA designated the NCCAB as in attainment for the current national 8-hour ozone standard of 0.075 ppm. In October 2015, the national standard was reduced to 0.070 ppm. However, the NCCAB continues to be in attainment with the federal ozone standard (MBARD 2017).

The following are the most pertinent MBARD rules that would limit emissions of air pollutants from development facilitated by the proposed project. However, this list is not comprehensive, and MBARD also promulgates rules applicable to numerous other activities.[2]

- **Rule 400 (Visible Emissions).** Discharge of visible air pollutant emissions into the atmosphere from any emission source for a period or periods aggregating more than three minutes in any one hour, as observed using an appropriate test method, is prohibited.
- **Rule 402 (Nuisances).** No person shall discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or which endanger the comfort, repose, health, or safety of any such persons or the public; or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 425 (Use of Cutback Asphalt).** The use of cutback asphalt (asphalt cement that has been blended with petroleum solvents) and emulsified asphalt (an emulsion of asphalt cement and water with a small amount of emulsifying agent) is restricted in order to limit ROG emissions. Rule 425 prohibits the use of rapid cure asphalt, restricts the use of medium cure asphalt to November through March, and limits the content of total distillate in slow cure asphalt and petroleum solvents in emulsified asphalt.
- **Rule 426 (Architectural Coatings).** This rule limits the emissions of ROGs from the use of architectural coatings and sets ROG content limits for a variety of coating categories, including flat, nonflat, nonflat – high gloss, and specialty coatings. Specifically, Rule 426 limits the ROG content of flat coatings to 50 grams per liter and nonflat coatings to 100 grams per liter. Persons are prohibited from manufacturing, blending, repackaging for use, supplying, selling, soliciting, or applying architectural coatings that exceed these limits.
- **Rule 439 (Building Removals).** This rule limits particulate emissions from the removal of buildings by prohibiting all visible emissions from building removal. To achieve compliance with this standard, Rule 439 requires work practice standards, including wetting the structure prior to removal, demolishing the structure inward toward the building pad, and prohibiting the commencement of removal activities when peak wind speeds exceed 15 miles per hour.
- **Rule 1000 (Permit Guidelines and Requirements for Sources Emitting Toxic Air Contaminants).** This rule regulates TACs from new or modified stationary sources that have the potential to emit carcinogenic or noncarcinogenic TACs. Rule 1000 requires sources of carcinogenic TACs to install best control technology and reduce cancer risk to less than one incident per 100,000 persons. Sources of noncarcinogenic TACs must apply reasonable control technology.

City of Pacific Grove General Plan

The City of Pacific Grove General Plan was adopted in 1994 and serves as the principal policy document for guiding the city's future conservation and development efforts. The General Plan's Transportation and Health and Safety Elements (City of Pacific Grove 1994) include the following goals and policies applicable to air quality issues related to the proposed project:

Goal T-4. Limit the increase in auto use through Transportation System Management. Increase transit ridership, carpooling, vanpooling, walking, and bicycling**.**

- **Policy 9.** Encourage visitor use of public transit, private tour buses, bicycling, or walking.
- **Policy 10.** Encourage design for new and expanded development that facilitates access by transit, walking, bicycles, and carpools.

[2] MBARD Rules available online at: https://www.mbard.org/current-rules

Goal T-7. Promote pedestrian and bicycle travel as alternative to automobile to use**.**

- **Policy 25.** Create and maintain a safe and convenient system of pedestrian and bicycle pathways throughout the city.

Goal H&S-3. Promote attainment, and insofar as possible, improve air quality in Pacific Grove and the Monterey Bay area**.**

- **Policy 11.** Use the CEQA process to identify and avoid or mitigate potentially significant air quality impacts of development.

4.2.3 Impact Analysis

a. Methodology

The MBARD *CEQA Air Quality Handbook* does not have plan-level thresholds and advises focusing on the project's cumulative air quality impact on regional ozone and localized carbon monoxide levels. Without MBARD plan-level thresholds, this DEIR evaluates broad air quality impacts and the project's consistency with the 2012-2015 AQMP, ensuring compliance with regional air quality goals. The analysis also examines short and long-term operational emissions, localized pollutant concentrations, TACs, and odors. A best-effort approach is used to disclose all foreseeable impacts based on available information, consistent with CEQA requirements. The baseline for air quality analysis is the existing condition at the time of NOP publication (January 2024), consist with *CEQA Guidelines* Section 15125(a).

Construction and operational emissions were estimated using CalEEMod, version 2022.1. CalEEMod uses default and project-specific information, including the project's land uses, square footage for different uses (e.g., multi-family residences and commercial development), and location, to estimate a project's construction and operational emissions. Development facilitated by the proposed project is focused on housing sites in several neighborhood districts, including Downtown, Central-Eardley Commercial, Forest Hill, Dennett Street, Sinex Avenue, and Grove Acre Avenue.

Development facilitated by the proposed project is anticipated to occur over the eight-year Housing Element cycle planning period. As discussed in Chapter 2, *Project Description,* the project could facilitate development of up to 2,335 housing units and 292,578 square feet of commercial area. To estimate emissions associated with buildout of the project in any given year of the eight-year Housing Element cycle planning period, the analysis evaluates a conservative sample individual project that hypothetically involves the development of one-quarter of total project buildout, or 584 housing units and 73,145 square feet of commercial area.[3] This individual sample project represents a conservative scenario as it assumes a higher-than-average annual rate of development (i.e., it assumes one-quarter of total potential buildout is built every year and total buildout would be reached in four years, rather than assuming potential buildout is evenly distributed over eight years) and assumes that construction and operation of residential and commercial land uses would overlap in a given year. Table 4.2-5 summarizes the land use assumptions used in CalEEMod.

[3] One quarter of 2,335 housing units is approximately 584 housing units and one-quarter of 292,578 square feet of commercial area is 73,145 square feet of commercial area.

Table 4.2-5 CalEEMod Land Use Assumptions

Land Use Categories	Buildout (Net Increase)
Project Buildout	
Residential – Mid-Rise Apartments[1]	2,335 units
Retail – Strip Mall[2]	292,578 square feet
Sample Individual Project	
Residential – Mid-Rise Apartments[1]	584 units
Retail – Strip Mall[2]	73,145 square feet

[1] Mid-rise apartments are rental buildings that have 3–10 levels. This land use category is appropriate because most residential development facilitated by the project would be larger than the Low-Rise Apartments land use category (1 to 2 levels) and all development facilitated by the project would be smaller than the High-Rise Apartments land use category (more than 10 levels) provided in the model.

[2] Strip Mall are small strip shopping centers containing a variety of retail shops and specialize in quality apparel, hard goods and services such as real estate offices, dance studios, florists and small restaurants. This land use provides a wider range of development options for project buildout compared to other commercial land uses in the model.

Construction Emissions

Development carried out under the proposed project is anticipated to be built over the eight-year Housing Element planning cycle period. Since construction emissions depend on project-specific details (e.g., the types of construction equipment used, construction schedule, export and import fill volumes), quantifying project buildout construction emissions would be speculative. It is anticipated that several individual projects could be constructed at any given time. Accordingly, the analysis herein evaluates the sample individual project described above under "Methodology" and is therefore conservative, as the sample individual project accounts for a higher than average rate of development per year.

Construction activities modeled by CalEEMod include emissions generated by construction equipment used on-site and emissions generated by vehicle trips associated with construction, such as worker and vendor trips. As discussed above under "Methodology," the analysis models a hypothetical individual sample project that includes 584 housing units and 73,145 square feet of commercial area. Construction phases would include demolition, grading, building construction, paving, and architectural coating. Demolition assumes the removal of building areas the same as the development area as a conservative estimate of daily emissions. Project construction for each project was assumed to last one year, and all construction phases would overlap. Other details such as construction equipment, worker trips, and vendor trips were based on CalEEMod defaults. Individual construction projects carried out under the proposed project would comply with MBARD Rule 426 Architectural Coating.

Operation Emissions

Operational emissions carried out under the proposed project were modeled and represent the emissions assuming buildout under the Housing Element planning period, as described in Chapter 2, *Project Description.* Development facilitated by the proposed project is anticipated to span the eight-year Housing Element planning cycle period. In addition, the analysis models a conservative higher-than-average rate of development per year of the project buildout. Therefore, a conservative sample individual project in a given year would develop 584 residential units and 73,145 square feet of commercial retail. In addition, emissions from project buildout, which consist of 2,335 residential units and 292,578 square feet of commercial retail space, were modeled, using a higher-than-average rate of development per year.

In CalEEMod, operational sources of criteria pollutant emissions include area, energy, and mobile sources. Area emissions were based on CalEEMod defaults for each land use type, such as fireplaces. Energy use emissions, from electricity and natural gas for heating, follow the methodology in Appendix C of the CalEEMod User Guide 2022.1. These estimates account for the 2019 Building Energy Efficiency Standards (Title 24) but not for updates in 2022, 2025, and 2028. Modeling for water, wastewater, and solid waste was based on the information in Section 4.19, *Utilities and Service Systems*. Mobile source emissions consist of emissions generated by vehicles to and from the project sites. Average daily VMT was derived from the Transportation Memorandum prepared by Kimley-Horn (Appendix E) and used to estimate mobile source emissions.

b. Significance Thresholds

Based on Appendix G of the *CEQA Guidelines,* the proposed project would have a significant impact to air quality if the project would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard;
3. Expose sensitive receptors to substantial pollutant concentrations; and/or
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

MBARD's *CEQA Air Quality Guidelines* (2008) does not establish quantitative significance thresholds for plan-level air quality impacts. As outlined in Section 7.8 of the *Guidelines*, a programmatic EIR should assess a project's cumulative air quality impact based on its consistency with the latest AQMP and its localized impact on carbon monoxide levels. This analysis also evaluates localized TAC emissions to sensitive receptors and potential odor impacts throughout the project's buildout.

Air Quality Management Plan Consistency

MBARD relies on information from CARB and Association of Monterey Bay Area Governments (AMBAG), including mobile and area source emissions, as well as projected regional growth, to forecast future emissions and determine necessary emissions reduction strategies through regulatory controls. Consistency with the AQMP is used by MBARD to address a project's cumulative impact on regional air quality (i.e., ozone levels). The AQMP accommodates growth by projecting growth in emissions based on different indicators. CARB mobile source emission projections and AMBAG growth projections are based on population and vehicle trends and land use plans developed by the cities and the counties as part of the development of the individual general plans. As such, according to the MBARD 2008 *CEQA Air Quality Guidelines*, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the regional air quality standards.

Carbon Monoxide Hotspot

MBARD's *CEQA Air Quality Guidelines* state that increased traffic volume or congestion from a project may cause or contribute to local CO hot spots. If screening results suggest potential CO hot spots, quantitative modeling should be conducted. Although four of the five screening criteria rely on outdated Level of Service standards and are no longer suitable for CEQA impacts under SB 743, the criterion for substantial heavy-duty traffic or traffic along urban street canyons or near major CO

sources remains valid. Due to insufficient project-specific details, localized CO emissions cannot be quantified for this plan-level project. Therefore, the potential exposure of sensitive receptors to CO hot spots is discussed qualitatively.

Regional Criteria Pollutant Significance Thresholds

MBARD developed project-level thresholds to analyze emissions from individual projects, but these thresholds are not suitable for plan-level projects. Plan-level projects consist of numerous individual projects and produce more criteria pollutants than a single project. Using project-level thresholds for plan-level projects may unfairly penalize them, leading to significant and unavoidable conclusions due to scale. However, this analysis includes construction and operational project-level thresholds, given the absence of plan-level thresholds from MBARD. Table 4.2-6 shows MBARD established thresholds of significance for air quality for construction and operational activities of land use development projects.

Table 4.2-6 MBARD Air Quality Thresholds of Significance

Air Pollutant	Construction (pounds per day)	Operation (pounds per day)
ROG	–	137
CO	–	550
NO_X	–	137
SO_x as SO_2	–	150
PM_{10}	82	82
$PM_{2.5}$	–	–

ROG = reactive organic gases, CO = carbon monoxide, NO_X = nitrogen oxides, SO_X = sulfur oxides, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter.

Source: MBARD 2008

To assess potential impacts at a plan-level, this analysis uses a population-based VMT threshold. This threshold is appropriate for evaluating operational air quality impacts because it accounts for emissions associated with areawide, long-term growth where population growth and travel behavior the main sources of emissions.

MBARD has not adopted a population-based VMT threshold; however, the Bay Area Air Quality Management District (BAAQMD) sets significance thresholds for criteria air pollutants based on VMT or vehicle trips relative to projected population increases, which this analysis utilizes. MBARD and BAAQMD are neighboring air districts and characterized by coastal climates and similar air basin characteristics. Therefore, to determine operational criteria pollutant impacts, this analysis uses BAAQMD's plan-level VMT and population growth rate threshold, which is established Chapter 3, *Thresholds of Significance,* in BAAQMD's 2022 CEQA Guidelines.

BAAQMD's plan-level VMT and population growth rate threshold states that a plan-level project would have less than significant impacts related to criteria air pollutants if:

- The project is consistent with current air quality plan control measures; and
- The project VMT or vehicle trip increase is less than or equal to the projected population increase.

Toxic Air Contaminants

According to MBARD Guidelines, a project would have a significant impact if it would site a sensitive receptor near an unregulated source of TAC emissions (e.g., diesel-fuel internal combustion engines, parking areas for diesel-fueled heavy-duty trucks and buses, gasoline stations, and dry cleaners) that would result in an exceedance of health risk public notification thresholds adopted by MBARD in Rule 1000. In addition, the Guidelines set forth the following thresholds, which are the same as the public notification thresholds (MBARD 2008):

- The hazard index is greater than 1 for acute or chronic impacts.
- The cancer risk is greater than 1 in one 100,000 for long-term operational emissions or 1 per 100,000 population for temporary construction-related emissions.

Odors

MBARD Guidelines state that odor impacts would be significant if the project would result in the emission of substantial concentrations of pollutants that produce objectionable odors, causing injury, nuisance, or annoyance to a considerable number of persons, or endangering the comfort, health, or safety of the public. Therefore, if the construction or operation of development facilitated by the project would emit pollutants associated with odors in substantial amounts, the analysis should assess the impact on existing or reasonably foreseeable sensitive receptors (MBARD 2008).

Cumulative Impacts

MBARD requires an evaluation of cumulative ozone and CO impacts. Cumulative ozone impacts are evaluated based on the project's consistency with the AQMP. Cumulative CO impacts are evaluated similarly to project impacts. The cumulative CO hotspot analysis should account for cumulative traffic volumes to assess cumulative CO impacts.

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 PROJECTED GROWTH UNDER THE PROPOSED PROJECT WOULD EXCEED GROWTH FORECASTS USED TO DEVELOP THE MBARD AQMP. HOWEVER, FUTURE GROWTH FORECASTS WOULD BE UPDATED TO REFLECT THE HOUSING ELEMENT UPDATE, AND THE GENERAL PLAN INCLUDES POLICIES TO REDUCE EMISSIONS ASSOCIATED WITH DEVELOPMENT. IN ADDITION, PROPOSED PROJECT BUILDOUT WOULD REDUCE REGIONAL VMT. THEREFORE, THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE AQMP AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed above under Section 4.2.3(b), *Significance Thresholds*, a project would conflict with or obstruct the implementation of the AQMP within the Monterey County region if it is inconsistent with the growth assumptions in the 2012-2015 AQMP (MBARD 2017). MBARD uses AMBAG's 2014 growth forecasts to project population-related emissions for the 2012-2015 AQMP in the NCCAB. AMBAG's forecasts are based on land use assumptions in the existing general plans of local governments within the NCCAB. When a housing element is updated, AQMPs and general plans land uses are also updated to accommodate future growth projected based on recent population growth trends. Therefore, an updated housing element, which plans for future housing needs and allocates land for residential development, would potentially generate growth and emissions exceeding both

the previous AQMP, general plan, and AMBAG projections. As shown in Table 4.2-7, this is the case for Pacific Grove. Population growth would exceed AMBAG projections for 2031, which were based on land use assumptions in the existing general plan adopted in 1994. However, future AMBAG growth projections would incorporate the proposed project's land use assumptions and would inform future air quality management in the NCCAB. Furthermore, the 2012-2015 AQMP provides Emission Reduction Strategies in Section 9.1, which include land use "planning efforts such as 'The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375…which supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of developing more sustainable communities.'"

Table 4.2-7 Comparison of AMBAG and Proposed Project Growth Projections

	Existing Conditions (2024)	Project Growth Potential (Projected Total by 2031)	2012-2015 AQMP Growth Forecast (Projected Total by 2031)[1]	Difference Between Project Growth and 2012-2012 AQMP Growth Forecast	Project Exceeds Growth Estimated in 2012-2015 AQMP?
Population (residents)	14,966[2]	19,916	16,683	+3,233	Yes
Employment (jobs)	7,815[3,4]	8,215	10,901	-2,686	No

AQMP = Air Quality Management Plan

[1] The 2031 population and employment numbers were interpolated from the Regional Growth Forecast projections for 2030 and 2035.Source: MBARD 2017

[2] Source: DOF 2024

[3] Source: AMBAG 2024a

[4] The employment existing condition data is from 2023.

While the proposed project would result in growth exceeding current population forecasts that inform the MBARD AQMP, the Pacific Grove General Plan includes goals and policies to reduce population-related emissions, primarily by promoting alternatives to personal vehicle use:

Transportation Element

Goal T-4. Limit the increase in auto use through Transportation System Management. Increase transit ridership, carpooling, vanpooling, walking, and bicycling**.**

- **Policy 9.** Encourage visitor use of public transit, private tour buses, bicycling, or walking.
- **Policy 10.** Encourage design for new and expanded development that facilitates access by transit, walking, bicycles, and carpools.

Goal T-7. Promote pedestrian and bicycle travel as alternative to automobile to use**.**

- **Policy 25.** Create and maintain a safe and convenient system of pedestrian and bicycle pathways throughout the city.

Health and Safety Element

Goal H&S-3. Promote attainment, and insofar as possible, improve air quality in Pacific Grove and the Monterey Bay area**.**

- **Policy 11.** Use the CEQA process to identify and avoid or mitigate potentially significant air quality impacts of development.

While the proposed project would accommodate its fair share of the regional housing needs allocation (RHNA) for Pacific Grove and increase the city's projected population beyond current AMBAG forecasts, the goals, policies, and amendments in the Pacific Grove General Plan ensure development facilitated by proposed project would consist of some mixed-use developments. Mixed-use developments promote mobility between different land uses, such as homes and retail shopping, through active transportation modes like walking and bicycling. This reduces the need for personal vehicle trips, resulting in fewer VMT. As described in Section 4.14, *Transportation*, the proposed project would reduce the forecasted rate of VMT per capita and VMT per employee below applicable thresholds, compared to both existing conditions and future baseline conditions. Reducing VMT per capita would equate to a reduction in the emissions of pollutants associated with vehicle travel in the region, such as CO in vehicle exhaust and PM_{10} in brake dust.

The proposed project would align with the City's General Plan and AQMP growth forecasts once they incorporate the latest growth projections from the Housing Element Update. Therefore, the proposed project would be consistent with the MBARD AQMP, and operation of future development would not result in a cumulatively considerable net increase in criteria pollutants for which the MBARD region is in non-attainment (i.e., ozone and PM_{10}). Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard?

Impact AQ-2 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD GENERATE SHORT-TERM AND LONG-TERM EMISSIONS OF CRITERIA POLLUTANTS. HOWEVER, CONSTRUCTION WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE MBARD REGION IS IN NONATTAINMENT. ADDITIONALLY, THE RATE OF INCREASE IN VMT WOULD NOT EXCEED THE RATE OF POPULATION GROWTH UNDER THE PROPOSED PROJECT. THEREFORE, IMPACTS RELATED TO BOTH CONSTRUCTION AND OPERATION WOULD BE LESS THAN SIGNIFICANT.

Construction

Development facilitated by the proposed project would result in temporary emissions associated with construction activities, such as construction worker travel to and from project sites, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The extent of daily emissions, particularly ROGs and NO_X emissions, generated by construction equipment would depend on the quantity of equipment used and the hours of operation for each project. In addition, ROG emissions would primarily depend on the square footage of buildings being painted and asphalt surfaces being paved each day. The extent of fugitive dust $PM_{2.5}$ and PM_{10} emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts.

MBARD does not provide specific criteria or plan-level significance thresholds to analyze construction emissions on a programmatic level and indicates that unknown impacts should be deferred for subsequent environmental review. However, as mentioned in Section 4.2.3(a), *Methodology,* this analysis conservatively estimates construction emissions by modeling a hypothetical individual sample project that includes 584 housing units and 73,145 square feet of commercial area. This is conservative because while it is expected that development would occur over the eight year Housing Element cycle, this analysis assumes a higher-than-average annual rate of development such that buildout would occur in four years. Additionally, it conservatively assumes a buildout of up to 100 percent of the maximum density, which is not guaranteed as housing development is mainly accomplished by the private sector and depends upon factors the City does not control, including financial resources, market trends, and other factors.

As shown in Table 4.2-8, maximum daily emissions from construction activities for individual residential and commercial projects are anticipated to not exceed MBARD regulatory thresholds for PM_{10} emissions. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard and impacts would be less than significant.

Table 4.2-8 Project Construction Emissions – Sample Individual Project

	Maximum Daily Emissions (pounds per day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Emissions	839	142	142	<1	59	18
MBARD Thresholds	N/A	N/A	N/A	N/A	82	N/A
Thresholds Exceeded?	**N/A**	**N/A**	**N/A**	**N/A**	**No**	**N/A**

PM_{10} = particulate matter with a diameter of 10 microns or less; ROG = reactive organic gas; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide; N/A = not applicable

Notes: All numbers have been rounded to the nearest tenth. Emissions presented are the highest of the winter and summer modeled emissions. Emission data is pulled from "unmitigated" results. See Appendix F for CalEEMod calculations and assumptions.

Operation

Depending upon the type, size, and timeframe of development, maximum daily emissions associated with individual projects could potentially exceed MBARD significance thresholds. However, such projects will be required to undergo independent, project-level CEQA review and include mitigation measures, if necessary, to address potentially significant impacts. MBARD does not have plan-level thresholds for evaluating operational criteria air pollutant emissions. BAAQMD has established plan-level thresholds for operational criteria air pollutants, indicating that projects where the projected growth rate of VMT does not exceed the projected population growth rate would be considered to have a less than significant impact on criteria air pollutants. MBARD and BAAQMD are neighboring air districts and characterized by coastal climates and similar air basin characteristics. Therefore, this analysis uses BAAQMD's plan level VMT and population growth rate threshold to determine operational criteria pollutant impacts.

As shown in Table 4.2-9, the proposed project is projected to accommodate a population increase of 4,950 persons by the year 2031. This is a 33 percent increase compared to the existing population of 14,996 persons. Additionally, the proposed project would generate an estimated daily VMT of 300,662 miles in the year 2031 in the project area, which is an increase of 50,758 miles or 20 percent compared to baseline conditions (249,905 miles) (Appendix E). Therefore, the proposed project would not exceed the rate of increase from the forecast population of approximately 33

percent. The proposed project's net VMT would increase at a lower percentage because it would concentrate growth and residences near jobs and services. This approach reduces singular vehicle trips and encourages alternative modes of transportation. Therefore, impacts concerning criteria pollutants generated from operation of the proposed project would be less than significant.

Table 4.2-9 Net Increase in Population versus VMT

Scenario	Baseline (2024)	Project 2031 Buildout	Net Increase
Population	14,966	19,916	4,950
Percentage change			33%
VMT[1]	249,905	300,662	50,758
Percentage change			20%

[1] Daily VMT for the City of Pacific Grove

Source: Appendix E

Operational emissions of the proposed project were modeled using CalEEMod version 2022.1. The proposed project would generate long-term criteria pollutant emissions (i.e., ROG, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$) from mobile sources (i.e., vehicle trips to and from the project site), area sources (e.g., architectural coatings, consumer products, and landscaping equipment), and energy sources (i.e., use of natural gas for cooking and water heating). Table 4.2-10 and Table 4.2-11 show the proposed project's buildout and sample individual project emissions for ROG, NO_x, CO, PM_{10} and $PM_{2.5}$. As shown, neither the proposed project buildout nor the sample individual project would exceed MBARD's regional thresholds for criteria air pollutants.

Table 4.2-10 Project Operational Emissions - Buildout

	Maximum Daily Emissions (pounds per day)					
Emission Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Mobile	4	13	111	<1	36	9
Area	73	1	146	<1	<1	<1
Energy	1	15	7	<1	1	1
Project Buildout Emissions	78	29	264	<1	37	11
MBARD Thresholds	137	137	550	150	82	N/A
Exceeded?	**No**	**No**	**No**	**No**	**No**	**N/A**

PM_{10} = particulate matter with a diameter of 10 microns or less; ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide

Notes: All numbers have been rounded to the nearest tenth. Emissions presented are the highest of the winter and summer modeled emissions. Emission data is pulled from "unmitigated" results. See Appendix F for CalEEMod calculations and assumptions.

Table 4.2-11 Project Operational Emissions – Sample Individual Project

	Maximum Daily Emissions (pounds per day)					
Emission Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Mobile	1	3	28	<1	9	2
Area	18	<1	37	<1	<1	<1
Energy	<1	4	2	<1	<1	<1
Project Buildout Emissions	20	7	66	<1	9	3
MBARD Thresholds	137	137	550	150	82	N/A
Exceeded?	**No**	**No**	**No**	**No**	**No**	**N/A**

PM_{10} = particulate matter with a diameter of 10 microns or less; ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide.

Notes: All numbers have been rounded to the nearest tenth. Emissions presented are the highest of the winter and summer modeled emissions. Emission data is pulled from "unmitigated" results. See Appendix F for CalEEMod calculations and assumptions.

Mitigation Measures

No mitigation is required.

Threshold 3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD NOT INCREASE CARBON MONOXIDE CONCENTRATIONS SUCH THAT IT WOULD CREATE CARBON MONOXIDE HOTSPOTS. WHILE THE PROJECT IS NOT CONSIDERED A LAND USE THAT WOULD GENERATE SUBSTANTIAL TOXIC AIR CONTAMINANTS EMISSIONS, EMISSIONS WITHIN 1,000 FEET OF A SENSITIVE RECEPTOR COULD EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. WITH THE IMPLEMENTATION OF MITIGATION MEASURES AQ-3(A) AND AQ-3(B), CONSTRUCTION IMPACTS ON SENSITIVE RECEPTORS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Localized Carbon Monoxide Hotspots

The proposed project buildout would result in new development or redevelopment that would generate additional vehicle trips on area roadways. Areas with high vehicle density, such as congested intersections, have the potential to create high concentrations of CO ("CO hotspots") and could potentially expose sensitive receptors to harmful levels of pollution. The NAAQS for CO is 35.0 ppm and the CAAQS for CO is 20.0 ppm. A project's localized air quality impact would be significant if it caused CO concentrations to exceed these standards.

Localized CO concentrations are the result of the volume of cars along a road and the level of emissions generated by vehicles, rather than the flow of traffic, and vehicle CO emissions have declined over time due to stringent state standards for vehicle emissions and would continue to decline as more stringent standards are put in place. In 2024, the Salinas #3 monitoring station in Monterey County, the nearest monitoring station to the project area, reported a CO maximum 1-hour concentration of 1.7 ppm and an 8-hour concentration of 0.6 ppm (USEPA 2025). These values are well below the respective 1-hour standard of 20 ppm and the 8-hour standard of 9 ppm. Given the ambient concentrations, which include both mobile and stationary sources, a project in the NCCAB would need to emit concentrations 11 times the hourly maximum ambient emissions and 15 times the 8-hour maximum ambient emissions for all sources near the Salinas #3 monitoring station before project emissions would exceed the 1-hour and 8-hour standards.

By way of illustration, a detailed carbon monoxide analysis was conducted during the preparation of the 2003 AQMP for the South Coast Air Quality Management District, which covers portions of Los Angeles, Riverside and San Bernardino counties and all of Orange County. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the South Coast Air Basin that are expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near Interstate 405. The concentration of CO at this intersection was 4.6 ppm, which is well below the state and federal standards. The Wilshire Boulevard/Veteran Avenue intersection has an ADT of approximately 100,000 vehicles per day (SCAQMD 2003). In comparison, the buildout of the proposed project would increase ADTs in the project area, with the highest ADT reaching approximately 19,763 on Forest Avenue. As such, the proposed project would not generate enough ADT at any intersection to result in CO hotspots.

Therefore, the proposed project would not expose sensitive receptors to substantial CO concentrations, and localized air quality impacts related to CO hot spots would be less than significant.

Toxic Air Contaminants

Construction

Construction-related activities would result in temporary project-generated DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. Generation of DPM, which was identified as a TAC by CARB in 1998, from construction projects typically occurs in a single area for a short period. MBARD's *CEQA Air Quality Guidelines* set the significance threshold for long-term public health risk at one excess cancer cases in 100,000 for cancer risk. For non-cancer risk, a Hazard Index of more than one (1.0) would cause a significant impact to sensitive receivers. If a formal health risk assessment identifies a significant impact, mitigation measures may be required to reduce the predicted levels of toxic air pollutants from the project to a level of less than significant. Currently, the development facilitated by the proposed project lacks sufficient detail for a project-level analysis due to the programmatic nature of the plan. As a result, analyzing project level impacts would be speculative. Therefore, construction related TAC emissions are discussed qualitatively.

The extent of DPM emissions from any individual construction project depends upon the following factors: (1) the amount of disturbed soils; (2) the length of disturbance time; (3) whether existing structures are demolished; (4) whether excavation is involved; and (5) whether transporting excavated materials off site is necessary. DPM emissions would be reduced during the other phases of individual project construction because activities such as building construction and architectural coating require less diesel-fueled construction equipment. Generation of DPM from construction projects typically occurs in a single area for a short period. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time.

Construction activities associated with buildout of the project would include site preparation and grading, building construction, installation of wet and dry utilities as needed, construction of roadway improvements, and architectural coating. These activities would generate DPM emissions

and dust, which can include PM_{10}. Construction equipment that would generate criteria pollutants include, but would not be limited to, excavators, graders, haul trucks, and loaders. It is assumed that all construction equipment used would be diesel-powered. Construction activities facilitated by the project are anticipated to use typical construction equipment such as those references by MBARD; therefore, DPM emissions from construction activities under the project were accounted for the emission inventories and would not have a significant impact on the attainment and maintenance of state or federal ozone AAQS (MBARD 2008). In addition, the proposed project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation. Compliance with these existing requirements would minimize emissions of TACs during construction.

While construction of buildout facilitated by the project is generally not anticipated to expose sensitive receptors to substantial pollutant concentrations, some construction activities would occur within 1,000 feet of a sensitive receptor, such as residences and schools. According to the California Office of Environmental Health Hazard Assessment, construction of individual projects lasting longer than two months and placed within 1,000 feet of sensitive receptors could potentially expose nearby sensitive receptors to substantial pollutant concentrations and therefore could result in potentially significant risk impacts (Office of Environmental Health Hazard Assessment 2015). Construction in proximity to these sensitive receptors could result in exposure to significant TAC emissions, depending on the size, amount of equipment, duration, and excavation activity. Therefore, impacts from the proposed project could be potentially significant and Mitigation Measures AQ-3(a) and AQ-3(b) are required.

Operation

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions. Typical sources of acutely and chronically hazardous TACs identified by CARB include distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities. MBARD also identifies additional common sources of TACs including diesel-fueled internal combustion engines and parking areas for diesel-fueled heavy-duty trucks and buses, gasoline stations and dry cleaners (MBARD 2008). CARB recommends siting distances both for the development of sensitive land uses in proximity to TAC sources and for the addition of new TAC sources in proximity to existing sensitive land uses.

Land uses facilitated by the proposed project include residential, commercial, and mixed use, and generally would not include the typical sources of TACs identified by CARB. However, individual projects constructed under the proposed project could include the use of stationary sources with the potential to emit TACs. Project applicants and/or tenants would be required to obtain an Authority to Construct and/or Permit to Operate from MBARD pursuant to Rule 1000 and conduct a risk assessment of associated TAC emissions. As part of the permit process, tenants would be required to demonstrate compliance with the following requirements, which are designed to prevent TAC emissions from causing or contributing to an increase in mortality or an increase in serious illness or from posing a present or potential hazard to human health:

- The acute and chronic hazard indices for any target organ or organ system due to TAC emissions do not exceed 1.0 at any receptor location; and
- The cancer risk due to TAC emissions does not exceed one in one 100,000 at any receptor location.

Other sources of potential air toxics associated with proposed project buildout include DPM from delivery trucks for commercial/retail uses (e.g., truck traffic on local streets and idling on adjacent streets) and the use of household hazardous materials such as cleaning solvents, paints, and landscape pesticides. However, these activities, and the land uses associated with the proposed project, are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in MBARD's and CARB's guidelines. It is expected that quantities of hazardous TACs generated on-site by future individual residents and commercial tenants (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Prevention Program, which regulates stationary sources of hazardous substances used annually in quantities ranging from 500 to 20,000 pounds. In the event that future tenants of commercial land uses utilize substantial quantities of hazardous substances, they would be subject to the requirements of the California Accidental Release Program and would be required to develop and implement a Risk Management Plan that would minimize the accidental release of hazardous substances and associated TAC emissions. Because stationary TAC sources in the project area would be required to comply with MBARD Rule 1000 and buildout of the proposed project would not otherwise result in substantial TAC sources, the proposed project would not result in the exposure of sensitive receptors to significant amounts of carcinogenic or toxic air contaminants. Therefore, impacts related to TAC emissions from stationary sources would be less than significant.

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides guidance for evaluating projects near high-traffic freeways and roadways and recommends against siting sensitive receptors within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day (CARB 2005). Major roadways in the project area include State Route 68, Lighthouse Avenue, David Avenue, and Presidio Avenue. According to California Department of Transportation, State Route 68 would have an average daily trip of 21,900 at the intersection of State Route 68 and State Route 1 (California Department of Transportation 2025). In addition, based on the existing ADTs for the project area provided by Kimley-Horn, the highest ADT would be 16,212 on Forest Avenue (Appendix E). Therefore, the proposed project would not introduce sensitive receptors within 500 feet of an urban road with 100,000 vehicles per day and would not exacerbate existing conditions such that on-site or off-site sensitive receptors would be exposed to substantial pollutant concentrations resulting from TAC emissions along high-volume roadways. Impacts related to TAC emissions from mobile sources would be less than significant.

Mitigation Measures

The following mitigation measures are required:

AQ-3(a) Construction Emissions Reductions

Prior to construction activity and issuance of grading permits for development facilitated by the project, the City Building Official shall confirm that the grading plan, building plans, and specifications stipulate the following measures shall be implemented:

- All mobile off-road equipment (wheeled or tracked) used during construction activities shall meet USEPA Tier 4 Final standards. Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards.

- Alternative fuel (natural gas, propane, electric, etc.) construction equipment shall be incorporated where available or necessary to reduce TAC emissions. These requirements shall be incorporated into the contract agreement with the construction contractor. A copy of the equipment's certification or model year specifications shall be available upon request for all equipment on-site.
- Electricity shall be supplied to the site from the existing power grid to support the electric construction equipment. If connection to the grid is determined to be infeasible for portions of the project, a non-diesel fueled generator shall be used.

AQ-3(b) MBARD Fugitive Dust Reduction Measures

The City shall require the implementation of the following MBARD fugitive dust reduction measures, where applicable, to reduce PM_{10} emissions generated by dust during the construction phase of development facilitated by the project:

- Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
- Prohibit all grading activities during periods of high wind (over 15 mph).
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area.
- Haul trucks shall maintain at least 2'0" of freeboard.
- Cover all trucks hauling dirt, sand, or loose materials.
- Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land.
- Plant vegetative ground cover in disturbed areas as soon as possible.
- Cover inactive storage piles.
- Install wheel washers at the entrance to construction sites for all exiting trucks.
- Pave all roads on construction sites.
- Sweep streets if visible soil material is carried out from the construction site.
- Post a publicly visible sign which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the Monterey Bay Unified Air Pollution Control District shall be visible to ensure compliance with Rule 402 (Nuisance).
- Limit the area under construction at any one time.

Significance After Mitigation

Implementation of Mitigation Measures AQ-3(a) and AQ-3(b) would reduce impacts related to health risks associated with exposure of sensitive receptors to substantial TAC concentrations during construction. Incorporating Mitigation Measure AQ-3(a) would significantly reduce DPM emissions compared to standard CalEEMod assumptions for engine tier. Additionally, incorporating Mitigation Measure AQ-3(b) would substantially reduce fugitive dust emissions. Watering twice daily in accordance with Mitigation Measure AQ-3(b) would reduce fugitive dust emissions by 61 percent, according to CalEEMod data based on scientific studies on dust emissions (CAPCOA 2022)."

Therefore, these mitigation measures would reduce potentially significant impacts resulting from PM_{10} emissions and exposure of sensitive receptors to substantial pollutant concentrations to a less than significant level.

Threshold 4:	Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT CREATE OBJECTIONABLE ODORS THAT WOULD IMPACT A SUBSTANTIAL NUMBER OF PEOPLE. IMPACTS RELATED TO ODORS WOULD BE LESS THAN SIGNIFICANT.

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust and during idling. However, these odors would be intermittent and temporary and would cease upon completion, and odors disperse with distance. In addition, MBARD Rule 402 prohibits the discharge of air contaminants or other materials which would cause a nuisance or detriment to a considerable number of persons or the public, except for odors from agricultural activities. Therefore, odors emitted from the construction of individual future projects under the proposed project would be less than significant.

Land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (MBARD 2008). Development facilitated by the proposed project would include residential and commercial uses. The proposed project does not include any uses associated with objectionable odors. Operational odor emissions would be limited to odors associated with vehicle and engine exhaust and trash receptacles. Solid waste generated by the proposed on-site uses would be properly stored in lidded dumpsters and/or trash cans and collected by a contracted waste hauler, ensuring that on-site waste would be managed and collected in a manner to prevent the proliferation of odors. Therefore, project operation would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.2.4 Cumulative Impacts

Air quality emissions in one location contribute to regional air quality in the NCCAB. Therefore, the geographic scope for considering cumulative impacts to air quality includes the entire NCCAB, which is comprised of Monterey, Santa Cruz, and San Benito counties and covers an area of more than 5,100 square miles. Since the NCCAB is designated a nonattainment area for the state PM_{10} standards, there is an existing adverse effect from this pollutant. Additional unplanned growth could exacerbate pollution and hinder the achievement of NAAQS and CAAQS in the NCCAB. The MBARD *CEQA Air Quality Guidelines* recommend analyzing cumulative impacts related to ozone and localized pollutants by identifying whether build out would create or substantially contribute to carbon monoxide 'hotspots' where federal or state AAQS are exceeded. Additionally, the project's cumulative impact should be analyzed by determining its consistency with the AQMP, as described further below.

Air pollution is largely a cumulative impact, and MBARD has provided guidance about cumulative impacts. According to MBARD, if a programmatic EIR is inconsistent with the latest AQMP, it would

result in a cumulatively adverse air quality impact. As described in Impact AQ-1 above, the project's buildout would exceed the 2012-2015 AQMP population and employment growth forecast for the project area, making it inconsistent with the AQMP's emissions forecasts. However, future AMBAG growth projections would incorporate the proposed project' buildout and would inform future air quality management in the NCCAB. Therefore, the proposed project would be consistent with the MBARD's AQMP, and the operation of future development would not result in a cumulatively considerable net increase in criteria pollutants for which the MBARD region is in non-attainment (i.e., PM_{10}). Therefore, the project's contribution to cumulative air quality impacts due to a conflict with the AQMP (Threshold 1) would not be cumulatively considerable.

As discussed in Section 4.2.2, *Regulatory Setting,* the project region is designated as a nonattainment area for the state standards for PM_{10}. Therefore, emissions associated with the construction and operation of cumulative development would contribute to net increases of criteria pollutants for which the project region is in nonattainment, and cumulative impacts would be significant. As discussed under Impact AQ-2, development facilitated by the project would temporarily increase construction air pollutant emissions and long-term operational air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels. However, emissions modeled for a conservative sample individual project would not exceed MBARD's construction and operational threshold. Additionally, development facilitated by the proposed project would not result in a VMT rate increase that exceeds the population growth rate increase. Therefore, the project would not result in a cumulatively considerable contribution to impacts related to net increases of criteria pollutants for which the project region is in nonattainment (Threshold 2).

Construction and operation of cumulative projects, in addition to development facilitated by the proposed project, could expose sensitive receptors to cancer risks exceeding the MBARD one in 100,000 thresholds. Although cumulative development would be required to comply with MBARD regulations and thresholds to reduce the potential for significant impacts to sensitive receptors, construction of future development occurring within 1,000 feet from a sensitive receptor (such as residences or schools), could expose sensitive receptors to significant TAC emissions, depending on the size, amount of equipment, duration, and excavation activity. Because the project region is largely developed with land uses associated with sensitive receptors, such as residential areas, it is likely that cumulative development would be located within 1,000 feet of sensitive receptors and would contribute to cumulative impacts related to exposing sensitive receptors to substantial pollutant concentrations. Therefore, cumulative impacts would be significant. As described under Impact AQ-3, construction TAC emissions from projects facilitated by the proposed project would be less than significant with Mitigation Measure AQ-3(a) and AQ-3(b) incorporated. Implementation of these mitigation measures would reduce TAC emissions associated with all construction facilitated by the project, including individual projects within 1,000 feet of sensitive receptors. Therefore, construction TAC impacts (Threshold 3) from the proposed project would not be cumulatively considerable.

Cumulative development could contribute to cumulative odor emissions if construction and operation of development occurs simultaneously. However, construction emissions would disperse rapidly with distance, preventing combined odors from nearby construction projects from exceeding analyzed levels. Additionally, cumulative projects would not include land uses that typically produce objectionable odors, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Therefore, cumulative odor impacts (Threshold 4) would be less than significant.

4.3 Biological Resources

This section describes the existing biological resources in the project area, evaluates the significance of potential impacts to sensitive biological resources (including impacts to special-status species, habitats, and local policies or ordinances that protect biological resources) that could result from implementation of the proposed project, and identifies feasible mitigation measures to reduce potentially significant impacts.

4.3.1 Setting

a. Physical Characteristics

The City of Pacific Grove is located along the California coast on the southern coast of Monterey Bay on the Monterey Peninsula. The project area consists of a variety of land use types including residential and commercial areas, a golf course, and open undeveloped space consisting of native vegetation communities. The project area includes low hills and dunes on the north side along the coast, and steeper hills at the center of the peninsula to the south. Elevations in the project area range from approximately sea level to 500 feet above mean sea level.

Soils

The Monterey Peninsula is located at the northern tip of the Santa Lucia Mountain Range. Soils within the project area are primarily comprised of Baywood sand, 2 to 15 percent slopes; and Narlon loamy fine sand, 2 to 9 percent slopes, with lesser elements of:

- Coastal beaches;
- Dune land;
- Narlon loamy fine sand, 15 to 30 percent slopes;
- Oceano loamy sand, 2 to 15 percent slopes;
- Rock outcrop-Xerorthents association, 30 to 75 percent slopes;
- Sheridan coarse sandy loam, 5 to 15 percent slopes; and
- Tangair fine sand, 2 to 9 percent slopes (Natural Resources Conservation Service 2024).

These soil types are found on marine terraces and stabilized dunes, and support Monterey pine forest, manzanita, and chaparral habitats (United States Department of Agriculture 1977).

Climate

The climate in the region is generally mild with an annual minimum average temperature of 48 degrees Fahrenheit, a maximum average temperature of 65 degrees Fahrenheit, and an average annual precipitation of 19.73 inches (Western Regional Climate Center 2024). The project area is also within the coastal fog zone, where coastal marine fog moves inland and provides moisture to more arid habitats.

b. Vegetation Communities and Land Cover Types

The project area is primarily developed, with a mixture of urban, commercial, institutional, and recreational uses. Small areas of coastal dune vegetation communities occur primarily along the

immediate coastline, north of Ocean View Boulevard at Point Pinos, and east and west of Sunset Drive at the Asilomar Dunes and Asilomar State Beach.

Naturalized stands of Monterey pine (*Pinus radiata*), Monterey cypress (*Hesperocyparis macrocarpa*), and coast live oak (*Quercus agrifolia*) occur throughout the project area, as part of the urban canopy and within more natural vegetation communities at George Washington Park and Rip Van Winkle Open Space.

The housing sites, upzoning areas, and additional parcels vary from partially developed to fully developed. Housing sites, upzoning areas, and additional parcels located in the Downtown District; Central-Eardley Commercial District; Dennett, Sinex, and Grove Acre Neighborhood; Sunset Service Commercial District (Site 56 only); Presidio-Austin Commercial District; and Forest Hill Commercial District are fully developed for commercial and residential use, with landscaped vegetation. Additionally, Sites 41, 42, 43, 46, 43, and 53, which are located outside of any districts, are also developed with landscaped vegetation.

Some natural vegetation communities occur in undeveloped areas and margins of Site 49, 47, 50, and 55, and additional parcels A1, A3, and A4 where naturalized stands of Monterey pine, Monterey cypress, and coast live oak occur.

c. Special-Status Species

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the United States Fish and Wildlife Service (USFWS), under the federal Endangered Species Act (ESA); those listed or candidates for listing as rare, threatened, or endangered by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA); animals designated as "Species of Special Concern" by CDFW; and CDFW Special Plants, specifically those with a California Rare Plant Rank of 1A, 1B, and 2, as assigned by the California Native Plant Society's (CNPS) online Inventory of Rare and Endangered Plants of California (CNPS 2024).

Data used to characterize the biological resources within and adjacent to the project area included aerial photographs, topographic maps, and species accounts. Other data on biological resources were collected from a query of CDFW's California Natural Diversity Database (CNDDB; CDFW 2024), the USFWS Information for Planning and Conservation (IPaC; USFWS 2024a), and the CNPS Inventory of Rare and Endangered Plants of California (CNPS 2024). The query of these data sources was conducted for the USGS *Monterey* 7.5-minute series quadrangle and four surrounding quadrangles (the industry standard nine quadrangle search was reduced due to the lack of quadrangles over the Pacific Ocean). The Critical Habitat Mapper (USFWS 2024b), the National Wetlands Inventory (USFWS 2024c), eBird (2024), and Bumble Bee Watch (The Xerces Society 2024) were also queried. The query results and habitat suitability rationale are included in Appendix G.

Special-Status Plant Species

Based on the results of the database queries, 51 special-status plant species were evaluated for their potential to occur in the project area (Appendix G). Based on the lack of generally required habitat types or features in the project area, such as vernal pools, broadleaf upland forest, native grasslands, arid chaparral, serpentine soils, and other species-specific habitat requirements, 27 special-status plant species were excluded from further evaluation. Thirteen (13) special-status plant species were previously documented within the project area, and 11 have some potential to occur based on the presence of suitable alkali soils and wetland habitat (Table 4.3-1).

Table 4.3-1 Special-status Plant Species with Potential to Occur in the Project Area

Common Name	Scientific Name	Status
Low Potential to Occur		
Coastal dunes milk-vetch	*Astragalus tener var. titi*	Federally and state endangered
Seaside bird's-beak	*Cordylanthus rigidus ssp. littoralis*	State endangered
Sand-loving wallflower	*Erysimum ammophilum*	CRPR 1B.2
Gowen cypress	*Hesperocyparis goveniana*	Federally threatened
Kellogg's horkelia	*Horkelia cuneata var. sericea*	CRPR 1B.1
Hickman's cinquefoil	*Potentilla hickmanii*	Federally and state endangered
Pine rose	*Rosa pinetorum*	CRPR 1B.2
Twisted horsehair lichen	*Sulcaria spiralifera*	CRPR 1B.2
Monterey clover	*Trifolium trichocalyx*	Federally and state endangered
Moderate Potential to Occur		
Angel's hair lichen	*Ramalina thrausta*	CRPR 2B.1
High Potential to Occur		
Hickman's onion	*Allium hickmanii*	CRPR 1B.2
Presumed Present		
Hooker's manzanita	*Arctostaphylos hookeri ssp. hookeri*	CRPR 1B.2
Pajaro manzanita	*Arctostaphylos pajaroensis*	CRPR 1B.1
Sandmat manzanita	*Arctostaphylos pumila*	CRPR 1B.2
Monterey spineflower	*Chorizanthe pungens var. pungens*	Federally threatened
Eastwood's goldenbush	*Ericameria fasciculata*	CRPR 1B.1
Menzies' wallflower	*Erysimum menziesii*	Federally and state endangered
Monterey gilia	*Gilia tenuiflora ssp. arenaria*	Federally endangered and state threatened
Monterey cypress	*Hesperocyparis macrocarpa*	CRPR 1B.2
Beach layia	*Layia carnosa*	Federally threatened and state endangered
Tidestrom's lupine	*Lupinus tidestromii*	Federally and state endangered
Monterey pine	*Pinus radiata*	CRPR 1B.1
Yadon's rein orchid	*Piperia yadonii*	Federally endangered
Pacific Grove clover	*Trifolium polyodon*	State rare

CRPR (CNPS California Rare Plant Rank, 2025a)
1A=Presumed Extinct in California
1B=Rare, Threatened, or Endangered in California and elsewhere
2A=Plants presumed extirpated in California, but more common elsewhere
2B=Plants Rare, Threatened, or Endangered in California, but more common elsewhere
CRPR Threat Code Extension
.1=Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)
.2=Fairly endangered in California (20-80% occurrences threatened)
.3=Not very endangered in California (<20% of occurrences threatened)

Habitat for special-status plants occurs in undeveloped areas of Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4 where naturalized stands of Monterey pine, Monterey cypress, and coast live oak occur. Species with the potential to occur in the housing sites, upzoning areas, and additional parcels are limited to species found in coniferous habitats, including:

- Hickman's onion,
- Hooker's manzanita,
- Eastwood's goldenbush,
- Monterey gilia,
- Gowen cypress,
- Kellogg's horkelia,
- Monterey pine,
- Yadon's rein orchid,
- Hickman's cinquefoil,
- Angel's hair lichen,
- Pine rose,
- Twisted horsehair lichen,
- Pacific Grove clover, and
- Monterey clover.

Due to the developed nature of the remaining sites and additional parcels, and isolation from natural habitats, special-status plants are not expected to occur on any of the other sites.

Special-Status Wildlife Species

Based on the results of the database queries, 29 special-status wildlife species were evaluated for their potential to occur in the project area (Appendix G). Twenty-two (22) special-status wildlife species were excluded from further analysis based on the lack of required habitat types or features in the project area such as arid chaparral and scrub, suitable freshwater aquatic habitats, level of disturbance due to recreational activities, previously documented occurrences that are historical and occurred before or during City development, or because the project area is outside of the species' known range. Four special-status wildlife species were previously documented within the project area and are presumed present, and three special-status wildlife species have some potential to occur due to the presence of wetlands, dunes, and suitable nesting, overwintering, or roosting trees in, or in the vicinity of, the project area (Table 4.3-2).

Table 4.3-2 Special-status Animals with Potential to Occur in the Project Area

Common Name	Scientific Name	Status[1]
Low Potential to Occur		
Smith's blue butterfly	*Antrozous pallidus*	Federally endangered
Tricolored blackbird	Agelaius tricolor	State threatened
Moderate Potential to Occur		
Townsend's big-eared bat	*Corynorhinus townsendii*	CDFW species of special Concern
Presumed Present		
Monarch - California overwintering population	*Danaus plexippus plexippus* Pop. 1	Federal candidate
Northern California legless lizard	*Anniella pulchra*	CDFW species of special Concern
Western pond turtle	*Emys marmorata*	Federally proposed threatened
Burrowing owl (wintering)	*Athene cunicularia*	State candidate

[1] CDFW 2025a

Habitat for special-status wildlife occurs in undeveloped areas of Sites 49, 47, 50, and 55, and additional parcels A1, A3, and A4. Species with the potential to occur in the housing sites, upzoning areas, and additional parcels include Townsend's big-eared bat and Northern California legless lizard.

Additionally, Sites 42 and 43 are approximately 100 to 200 feet from George Washington Park, a known overwintering site for monarch butterfly. Habitat for native nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) occurs throughout the housing sites, upzoning areas, and additional parcels.

No habitat for Smith's blue butterfly, tricolored blackbird, western pond turtle, or burrowing owl occurs within the housing sites, upzoning areas, and additional parcels; and identified sites are isolated from these species habitats by existing urban development.

Marine Mammals and Species of Regional Significance

Pacific harbor seals (*Phoca vitulina richardsi*) are protected under the Marine Mammal Protection Act (MMPA) and are known to occur along the rocky shores of the project area. A year-round colony of harbor seals occur at a sheltered beach on the southwest side of Cabrillo Point, near the Hopkins Marine Station. Harbor seals have their pups on this beach between February through May, and the City has updated its Municipal Code to provide protections during the pupping season (City of Pacific Grove 2020: 13-14). Pacific harbor seal populations are monitored by the National Marine Fisheries Service (NMFS), which prepares annual marine mammal stock assessments. The Pacific harbor seal is not federally listed under the ESA, and the population in California is not considered "depleted" or a "strategic" stock under the MMPA. Furthermore, this population appears to be growing (NMFS 2014).

Black oystercatcher (*Haematopus bachmani*) also occurs along the rocky shores of the project area, foraging in intertidal areas and nesting just above the high-tide line. The City of Pacific Grove has partnered with the Audubon Society and the Bureau of Land Management in a multi-year monitoring program of black oystercatcher as a "keystone species" indicator of the overall health of the intertidal environment (City of Pacific Grove 2020: 12-13). Black oystercatcher is not a federal or state-listed species, but is protected under the MBTA and CFGC.

No marine or intertidal habitats for Pacific harbor seal or black oystercatcher occur within the housing sites, upzoning areas, or additional parcels; and identified sites are isolated from these habitats by existing urban development. The nearest housing site, upzoning area, or additional parcel to marine habitats is Site 52, approximately 420 feet from Shoreline Park and the Pacific Ocean. Additionally, Site 19 and Site 12 are approximately 470 feet and 637 feet from the beach at Cabrillo Point, respectively.

d. Waters and Wetlands

Based on a review of the USFWS National Wetlands Inventory, waters and wetlands documented in the project area include marine habitats along the edge of the Pacific Ocean, two freshwater ponds, and one intermittent stream (USFWS 2024c). Crespi Pond is a freshwater pond located at the Pacific Grove Golf Links, at Point Pinos. A second freshwater pond is mapped at the California American Water Operation Center located on Carmel Avenue and is an excavated basin. An unnamed intermittent stream and associated emergent wetland at Majella Slough occurs south of Asilomar State Beach, originating in the Rip Van Winkle Open Space (City of Pacific Grove 2020: Figure 3-5).

A short segment (approximately 271 feet) of the intermittent stream is located within Site 49. A review of Google imagery also indicated there may be a drainage on additional parcels A3 and A4. These features may be under United States Army Corps of Engineers (USACE), CDFW, and/or Central Coast Regional Water Quality Control Board (RWQCB) jurisdiction.

e. Natural Communities and Habitats

Sensitive Natural Communities

Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. CDFW ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in the CNDDB. Sensitive natural communities included in the CNDDB follow the original methodology according to Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986). The methodology for determining sensitivity continues to be revised and is now based on *A Manual of California Vegetation, Online Edition* (CNPS 2025b). Communities considered sensitive by CDFW are published in the California Sensitive Natural Communities List (CDFW 2023). Vegetation alliances are ranked 1 through 5 based on NatureServe's (2010) methodology, with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Riparian areas are also considered sensitive natural communities by CDFW.

Sensitive communities documented within the project area include Central Dune Scrub, Monterey Pine Forest, and Central Maritime Chaparral (CDFW 2024). Sensitive communities may occur in undeveloped areas of Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4.

Critical Habitat

Critical habitat is a term used in the ESA and defined as a specific geographic area (or areas) that contain features essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. These areas provide notice to the public and land managers of the importance of these areas to the conservation of a listed species. Special protections and/or restrictions are possible in these areas when federal funding, permits, licenses, authorizations, or actions occur or are required.

Critical habitat for four federally listed species occurs in the project area. Critical habitat for Yadon's piperia (rein orchid) occurs within the project area at the Rip Van Winkle Open Space. Yadon's piperia Critical Habitat Subunit 6e is 42 acres in size, 7 of which occur within the City. Several hundred plants have been documented within this critical habitat unit (USFWS 2007). Critical habitat for Monterey spineflower occurs at Asilomar State Beach and Asilomar Dunes, south of Lighthouse Avenue. Monterey spineflower Critical Habitat Unit D: Asilomar Unit is approximately 310 acres, and assumes a population in the thousands (USFWS 2002). Proposed critical habitat for monarch butterfly within the project area occurs at the Pacific Grove Monarch Butterfly Sanctuary, Unit 4 Monterey County (site #2935) (USFWS 2024d). Critical habitat for Yadon's rein orchid occurs along the edge of Sites 49, 50, and 55, and additional parcels A3 and A4 (Subunit 6e) as broadly mapped by USFWS (2007). No other sites or additional parcels occur in or adjacent to mapped critical habitat.

Environmentally Sensitive Habitat Areas

Environmentally Sensitive Habitat Areas (ESHA) identified in the City of Pacific Grove's Local Coastal Program (LCP) occur in the Coastal Zone of the project area, and include natural habitats along the shoreline such as beaches, tide pools, and rock formations, restored and naturally occurring sensitive habitats such as coastal bluff, sand dune scrub, Monterey pine forest, and wetlands and waters (Pacific Grove 2015: 3-36, Figure 3-5).

All of the sites located within the Coastal Zone boundary (Sites 10, 11, 12, 19, and 56, and portions of the Central-Eardley and Sunset Service Commercial Districts) are developed, mapped as low sensitivity, and consistent with the LCP land use designations for commercial and residential development, and therefore do not contain ESHA.

f. Wildlife Movement Corridors

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

The habitats within the linkage do not necessarily need to be the same as the habitats that are being linked. Rather, the linkage merely needs to contain sufficient cover and forage to allow temporary inhabitation by ground-dwelling species. Typically, habitat linkages are contiguous strips of natural areas, though dense plantings of landscape vegetation can be used by certain disturbance-tolerant species. Depending upon the species using a corridor, specific physical resources (such as rock outcroppings, vernal pools, or oak trees) may need to be located within the habitat linkage at certain intervals to allow slower-moving species to traverse the link. For highly mobile or aerial species, habitat linkages may be discontinuous patches of suitable resources spaced sufficiently close together to permit travel along a route in a short period of time.

Wildlife movement corridors can be both large and small scale. Essential Connectivity Areas (ECAs) are mapped in the report *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (Spencer et al. 2010), and represent principal connections between Natural Landscape Blocks. ECAs are regions in which land conservation and management actions should be prioritized to maintain and enhance connectivity between areas of high ecological importance. ECAs are mapped based on coarse ecological condition indicators, rather than the needs of particular species and thus serve most of the species in each region. It is important to recognize that even areas outside of Natural Landscape Blocks and ECAs support important ecological values and should not be immediately discounted as lacking conservation value without further review.

No ECAs are mapped within the project area (CDFW 2025b). Given the location on the Monterey Peninsula and lack of perennial rivers and streams, the project area does not provide a significant corridor for terrestrial or freshwater wildlife movement. Marine habitats in Monterey Bay provide significant corridors for marine species; however, these habitats are outside the project area and the housing sites, upzoning areas, and additional parcels are isolated from these habitats by existing urban development.

4.3.2 Regulatory Setting

a. Federal Regulations

Federal Endangered Species Act

Under the ESA, authorization is required to "take" a listed species. Take is defined under Section 3 of the ESA as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Under federal regulation (50 Code of Federal Regulations [CFR] Sections 17.3, 222.102), "harm" is further defined to include habitat modification or degradation where it would be expected to result in death or injury to listed wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Critical habitat is a specific geographic area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. Section 7 of the ESA outlines procedures for federal interagency cooperation to conserve federally listed species and designated critical habitat.

Section 7(a)(2) of the ESA and its implementing regulations require federal agencies to consult with USFWS or NMFS to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species, or result in the destruction or adverse modification of critical habitat. For projects where federal action is not involved and take of a listed species may occur, the project proponent may seek to obtain an incidental take permit under Section 10(a) of the ESA. Section 10(a) allows USFWS to permit the incidental take of listed species if such take is accompanied by a Habitat Conservation Plan that includes components to minimize and mitigate impacts associated with the take.

The USFWS and NMFS share responsibility and regulatory authority for implementing the ESA (7 United States Code [USC] Section 136, 16 USC Section 1531 et seq.).

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

The MBTA authorizes the Secretary of the Interior to regulate the taking of migratory birds. The MBTA provides that it is unlawful, except as permitted by regulations, "to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, […] any migratory bird, or any part, nest, or egg of any such bird" (16 USC Section 703[a]). The Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the MBTA (16 USC Section 703-711) and the Bald and Golden Eagle Protection Act (16 USC Section 668). Under the Bald and Golden Eagle Protection Act's Eagle Permit Rule (50 CFR 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

United States Army Corps of Engineers

Under Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act, the USACE has authority to regulate activity that could discharge fill or dredge material or otherwise adversely modify wetlands or other waters of the US. Perennial and intermittent creeks and adjacent wetlands are considered waters of the US and are within the regulatory jurisdiction of the USACE. USACE implements the federal policy embodied in Executive Order 11990, which, when implemented, is intended to result in no net loss of wetland values or acres. In achieving the goals of

the CWA, USACE seeks to avoid adverse impacts and to offset unavoidable adverse impacts to existing aquatic resources. Any fill or adverse modification of waters of the US, including wetlands, would require a permit from the USACE prior to the start of work.

Marine Mammal Protection Act

The MMPA, enacted on October 21, 1972, provides for the protection of all marine mammals. The MMPA prohibits, with certain exceptions, the "take" of marine mammals in US waters and by US citizens on the high seas, and the importation of marine mammals and marine mammal products into the US. Jurisdiction for the MMPA is shared by USFWS and NMFS. The Service's Branch of Permits is responsible for issuing take permits when exceptions are made to MMPA.

b. State Regulations

California Endangered Species Act

CESA establishes state policy to conserve, protect, restore, and enhance species or habitat listed under CESA as threatened or endangered. For projects that would affect species that are on the federal and state lists, compliance with the federal ESA satisfies CESA if CDFW determines that the federal incidental take authorization is consistent with CESA under CFGC Section 2080.1. For projects that would result in take of species that are only state listed, the project proponent must apply for an incidental take permit under Section 2081(b) of the CFGC in order to take those listed species.

California Native Plant Protection Act

The California Native Plant Protection Act (CNPPA) of 1977 prohibits importation of rare and endangered plants into California, "take" of rare and endangered plants, and sale of rare and endangered plants.

California Department of Fish and Wildlife and California Fish and Game Code

CDFW derives its authority from the CFGC. CESA (CFGC Section 2050 et seq.) prohibits take of state listed species, including candidates for listing. Take under CESA is restricted to direct mortality of a listed species and does not expressly prohibit indirect harm by way of habitat modification. CDFW prohibits take for species designated as Fully Protected under the CFGC. CFGC Sections 3503, 3503.5, and 3511 describe unlawful take, possession, or destruction of birds, nests, and eggs. Section 3503 prohibits the take of nests or eggs of any bird. Section 3503.5 protects all birds-of-prey and their eggs and nests against take. Section 3513 prohibits the take of migratory nongame birds as designated in the MBTA except as provided by the MBTA.

Species of Special Concern is a category used by CDFW for those species which are considered indicators of regional habitat changes or are considered potential future protected species. Species of Special Concern do not have any special legal status except that which may be afforded by the CFGC as noted above. The Species of Special Concern category is intended by CDFW for use as a management tool to include these species into special consideration when decisions are made concerning the development of natural lands.

CDFW also has the authority to administer the CNPPA (CFGC Section 1900 et seq.). The CNPPA requires CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under Section 1913(c) of the CNPPA, the owner of land where a rare or endangered native plant is growing is required to notify the department at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

Perennial and intermittent streams and associated riparian vegetation, when present, also fall under the jurisdiction of CDFW. Section 1600 et seq. of the CFGC (Lake and Streambed Alteration Agreements) gives CDFW regulatory authority over work within the stream zone (which could extend on either side of the stream bank to the 100-year flood plain) consisting of, but not limited to, the diversion or obstruction of the natural flow or changes in the channel, bed, or bank of any river, stream or lake.

Regional Water Quality Control Board

In addition, the State Water Resources Control Board (SWRCB) and each of nine local RWQCBs are responsible for upholding state water quality standards. Pursuant to Section 401 of the CWA, projects that apply for a USACE permit for discharge of dredge or fill material must obtain water quality certification under Section 401 from the RWQCB.

The SWRCB and each of the RWQCBs also have jurisdiction over “waters of the State” pursuant to the Porter-Cologne Water Quality Control Act. Waters of the State are defined as any surface water or groundwater, including saline waters, within the boundaries of the state. The SWRCB has issued general Waste Discharge Requirements regarding discharges to “isolated” waters of the state for certain projects (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the US Army Corps of Engineers to be Outside of Federal Jurisdiction). The local RWQCB administers this general order for isolated waters not subject to federal jurisdiction and is also responsible for the issuance of water quality certifications pursuant to Section 401 of the CWA for waters subject to federal jurisdiction. To assure uniformity in RWQCB procedures, in April 2019 the SWRCB adopted new regulations defining California wetlands and other waters of the State subject to state regulation, and new procedures for reviewing and approving discharges of dredged or fill materials in these wetlands and waters.

The CWA and associated federal regulations (40 CFR Section 123.25[a][9], 122.26[a], 122.26[b][14][x] and 122.26[b][15]) require nearly all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, including smaller sites in a larger common plan of development or sale, to obtain coverage under a National Pollutant Discharge Elimination System permit for their stormwater discharges, and develop a Storm Water Pollution Prevention Plan. The National Pollutant Discharge Elimination System Program is a federal program which has been delegated to the State of California for implementation through SWRCB and RWQCBs.

Marine Life Protection Act

The Marine Life Protection Act (1999) was enacted to redesign California’s existing system of marine protected areas to increase protection of marine life, habitats, and ecosystems. Marine protected areas adjacent to the City of Pacific Grove include: Asilomar State Marine Reserve, Pacific Grove Marine Gardens State Marine Conservation Area, and Lovers Point - Julia Platt State Marine Reserve.

c. Local Regulations

City of Pacific Grove Local Coastal Program

Under the Coastal Zone Management Act of 1972 and California Coastal Act of 1976, the California Coastal Commission is entrusted to review proposed development in the Coastal Zone. The City's LCP requires that an initial site assessment be included in Coastal Development Permit applications, for the project site and a 100-foot buffer. If the initial site assessment reveals the potential presence of ESHAs within 100 feet of any portion of the proposed development, a biological assessment of ESHA and potential for project related impacts in conformance with the City's Implementation Plan is required (Pacific Grove Municipal Code Section 23.90.170[b][2]). The biological assessment is required to document the biological conditions, potential for special-status species, wildlife habitats, and presence/absence of ESHA. The assessment must also include a discussion of potential adverse impacts to biological resources, recommended mitigation measures, and any applicable permitting requirements. If the assessment determines there is potential to adversely impact biological resources, a Construction Mitigation and Monitoring Plan is required (Pacific Grove Municipal Code Section 23.90.170[b][3]). Additionally, Pacific Grove Municipal Code Section 23.90.150, *Water Quality and Marine Resources*, requires development to conform with the LCP's water quality and marine resources policies; these include erosion control and water quality best management practices (silt fences, straw wattles, etc.) to be implemented during construction, and a Post-Development Runoff Plan (Pacific Grove Municipal Code Section 23.90.150[2]). The City's LCP was certified by the California Coastal Commission in March 2020.

City of Pacific Grove General Plan

The City of Pacific Grove General Plan Natural Resources Chapter (City of Pacific Grove 1994) includes goals and policies for the protection of natural resources within the City and in some cases extend the policies of the LCP outside the Coastal Zone. Applicable goals and policies include:

Goal 1. Comprehensively manage Pacific Grove's vegetation and wildlife habitat.

- **Policy 1.** Consult with the Pacific Grove Museum of Natural History staff regarding matters of natural resource management.
- **Policy 2.** Develop a vegetation and wildlife habitat management program.
  - **Program A.** Work in concert with the California Department of Fish and Game to manage wildlife.
  - **Program C.** Work with citizens to encourage tree planting on private property.
- **Policy 3.** Actively promote tree planting to maintain and renew the urban forest.
  - **Program B.** Prepare and adopt a comprehensive and citywide urban forest management plan.
- **Policy 4.** Mitigate development in environmentally sensitive areas.
- **Policy 5.** Manage the use of publicly-owned environmentally sensitive areas.
  - **Program F.** Maintain contiguous areas of undisturbed land in open space uses wherever possible to protect environmentally sensitive habitat areas and associated wildlife values (LUP, 3.4.4.3).

Goal 4. Protect Pacific Grove's water and marine resources.

- **Policy 9.** Prohibit the unsafe use of chemical pesticides and herbicides.

Goal 5. Protect Pacific Grove's biological resources.

- **Policy 10.** Continue to promote Pacific Grove as "Butterfly Town U.S.A."
- **Policy 11.** Support the adoption of enhanced penalties for dumping of trash and/or hazardous materials that will affect environmentally sensitive areas.

Goal 6. Protect endangered species.

- **Policy 12.** Develop methods to maintain endangered species within the Asilomar Dunes neighborhood, Asilomar State Beach and Conference Grounds, the U.S. Coast Guard Reservation, the Pacific Grove shoreline, and other appropriate areas (LCP, 2.3.6.2).

City of Pacific Grove Municipal Code

Trees and the Urban Forest

Pacific Grove Municipal Code Section 12.20.020(a) designates five categories of protected trees:

1. All native trees, including Monterey cypress and Monterey pine trees that are six inches or greater in trunk diameter when measured at 54 inches above native grade, are protected trees.
2. All trees on private property 12 inches or greater in trunk diameter.
3. All trees in or within 100 yards of designated monarch butterfly sanctuaries. Designated monarch sanctuaries within the City include the Monarch Grove Sanctuary and George Washington Park.
4. All trees on public property 6 inches or greater in trunk diameter, and all Street Trees, regardless of size.
5. Designated trees, including all trees that are otherwise protected and will be impacted as a result of development, including pruning and impacts to critical root zones.

Substantial pruning or removal of any protected tree requires a permit. A tree removal permit application, fee, and written Tree Report, as specified in the Urban Forestry Standards, are required (Pacific Grove Municipal Code Section 12.60.010). Development permit applications including designated tree removal are required to include a tree resource assessment performed by a qualified professional, if deemed necessary by the City arborist (Pacific Grove Municipal Code Section 12.30.010).

Wildlife Protection

Pacific Grove Municipal Code Section 12.20.060, *Wildlife Protection*, requires that tree pruning and removal activities take place outside of the nesting season of listed threatened, endangered, or special-status species as specified by the California Department of Fish and Game (now known as CDFW) or USFWS.

Marine Refuge

Pacific Grove Municipal Code Section 14.04, *Marine Refuge*, provides protections for Pacific harbor seals during the pupping season. In the event harbor seal pups are delivered on any beach within

the city, the municipal code requires temporary beach closures, protective fencing (at least a 50 foot buffer), and signage to prevent disturbance. The municipal code also includes measures to deter adult and juvenile harbor seals from hauling out at Lovers Point Beach, such as human presence, acoustic devices, and sonic repellants.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The project's impacts related to special-status species, sensitive natural communities, potential jurisdictional areas and other protected biological resources are evaluated based on the project's adherence to local, state, and federal requirements; current conditions and level of existing development, construction activities, the change in land use and proposed operational activities; and the nature of proposed development and its potential to effect sensitive biological resources. The potential for biological resources in this analysis is based on a desktop review of aerial imagery, existing background documents, and agency database queries, including the CNDDB (CDFW 2024), IPaC (USFWS 2024a), and the Inventory of Rare and Endangered Plants of California (CNPS 2024).

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on biological resources if it would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service;
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service;
3. 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;
4. 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;
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Impact BIO-1 DEVELOPMENT FACILITATED BY THE PROJECT COULD DISTURB KNOWN SPECIAL-STATUS SPECIES OR THEIR ASSOCIATED HABITAT, INCLUDING THROUGH HABITAT MODIFICATIONS, ON A SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL-STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS, OR BY THE CDFW OR USFWS. DEVELOPMENT FACILITATED BY THE PROJECT DURING THE NESTING BIRD SEASON COULD DIRECTLY AND/OR INDIRECTLY AFFECT NESTING BIRDS PROTECTED UNDER THE MBTA AND CFGC SECTION 3503. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Construction

As discussed in Section 4.3.1, *Setting*, special-status plants and wildlife have the potential to occur in the project area, including state- and federally-listed species. Specifically, special-status species could occur in undeveloped areas in Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4 where natural vegetation communities may be present.

Special-status Plants

Several special-status plants have been documented in the project area and have a moderate to high potential to occur at Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4. These species include, but are not limited to, Monterey gilia, Yadon's rein orchid, Hickman's onion, and Eastwood's goldenbush. Development facilitated by the project in these areas could result in direct impacts to special-status plant species through vegetation removal, soil disturbance, and habitat modification during construction activities, potentially leading to the loss of individuals and degradation of habitat. Impacts to special status plants outside Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4 are not anticipated as a result of project implementation. Impacts to special-status plant species would be potentially significant. Mitigation Measures BIO-1(a) through BIO-1(c) would be required.

Critical habitat for Yadon's rein orchid occurs along the southern edge of Site 50 and 55 within the Rip Van Winkle Open Space. However, within Site 50, this location includes the edge of a parking lot, buildings, and the United Methodist Church, and may only contain marginal habitat. Therefore, although Site 50 is located within the defined limits of USFWS critical habitat, the site lacks actual necessary habitat components required to support Yadon's rein orchid. However, potentially significant indirect impacts could occur through the establishment of non-native invasive species off-site, if seeds of invasive plant species are transported to the site on muddy or dirty construction equipment. Impacts to critical habitat would therefore be potentially significant and Mitigation Measures BIO-1(c) and BIO-1(i) would be required.

Special-status Wildlife

Special-status wildlife, including Northern California legless lizard and Townsend's big-eared bat, may occur in undeveloped areas of Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4, where natural habitats may be present. If Northern California legless lizards are present in the work

area during construction activities, individuals may be impacted through vibration and noise disturbance or direct mortality (e.g., crushing of individuals by construction equipment). Impacts to Northern California legless lizard would be potentially significant and Mitigation Measures BIO-1(d) and BIO-1(e) would be required. No habitat for Smith's blue butterfly, tricolored blackbird, western pond turtle, or burrowing owl occurs within the housing sites, upzoning areas, or immediate vicinity; therefore, no impacts to these species are anticipated as a result of project implementation.

Impacts to Townsend's big-eared bat could occur if bat roosts are present in trees proposed for removal or in the vicinity of disturbance in undeveloped areas. These impacts could result in direct mortality or abandonment of maternal colonies, if present. Impacts to Townsend's big-eared bat would be potentially significant and Mitigation Measures BIO-1(d) and BIO-1(f) would be required.

Although no overwintering habitat for monarch butterfly occurs within the sites, Sites 42 and 43 are approximately 100 to 200 feet east of George Washington Park. The Pacific Grove Municipal Code protects trees within 100 yards (300 feet) of monarch butterfly habitat; removal of trees at these sites would require a Tree Removal Permit issued by the City. Construction noise and vibration could disturb monarch butterflies, if construction occurs within 300 feet of a winter roosting site. Impacts to monarch butterfly would be potentially significant. Mitigation Measures BIO-1(d) and BIO-1(g) would be required.

If nesting birds are present at individual development sites, or immediate vicinity of individual sites, development facilitated by the project could result in direct mortality through removal of active nests or disturbance levels that cause nest abandonment. Impacts to nesting birds would be potentially significant and Mitigation Measure BIO-1(h) would be required.

Housing sites, upzoning areas, and additional parcels are generally situated over 420 feet or more from marine areas. The nearest individual site to marine habitats, Site 52, is approximately 420 feet from the Pacific Ocean, and is isolated from marine habitats by two blocks of existing residential development. Additionally, Site 19 and Site 12, approximately 470 feet and 637 feet from marine habitats, respectively, are similarly isolated by existing residential and commercial development. As discussed in Section 4.11, *Noise*, construction activities would be required to comply with the noise limits established in the City's noise regulations, including maximum allowable decibel levels and timing restrictions (Title 24 California Code of Regulations, Zoning Ordinance, and Chapter 11.96 of the Municipal Code). Therefore, marine areas are sufficiently distanced from sites such that no impacts to Pacific harbor seal, black oyster catcher, or any special-status species associated with marine habitats would occur.

Operation

Development facilitated by the proposed project would result in the addition of residential units and commercial space in the project area, including within undeveloped areas at Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4. However, Sites 47, 50, and 55 already contain some level of development (e.g., the United Methodist Church, single family housing, and a commercial building). Site 49 is currently undeveloped; however, it is bordered by development on all sides, including industrial, recreational, and commercial uses. Additional parcels A1, A3, and A4 are bordered on three sides by residential development. Therefore, these sites provide marginal habitat value for special-status species.

Once a site has been developed or re-developed, the proposed operational uses of individual sites would not result in substantial new operational impacts to special-status plants or wildlife beyond those occurring under existing baseline conditions. While human and domestic animal activity could

continue to affect nearby biological resources, such activity is already common in the project area due to existing surrounding development and/or recreational use. Therefore, operational activity associated with the proposed project would not substantially increase impacts to special-status species. No operational impacts to Northern California legless lizard and Townsend's big-eared bat are anticipated given the existing level of development in the project area and the availability of higher quality habitat at Asilomar State Beach and the Del Monte Forest. Additionally, no operational impacts to monarch butterfly are anticipated due to existing protections in the City's Municipal Code for overwintering groves at the Pacific Grove Monarch Butterfly Sanctuary and George Washington Park. Therefore, operational impacts to special-status species would be less than significant.

Mitigation Measures

BIO-1(a) Special-status Plant Species Surveys

A City-approved biologist shall complete surveys for special-status plants in undeveloped areas at Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4 prior to any vegetation removal, grubbing, or other construction activity (including staging and mobilization). The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species. All plant surveys shall be conducted by a City-approved biologist during the blooming season, and during development application processing yet prior to development permit approval. All special-status plant species identified on each site shall be mapped onto a site-specific aerial photograph or topographic map with the use of Global Positioning System unit. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the City, and the CDFW and/or USFWS for state or federally listed plants, as appropriate, for review and/or approval. If project construction does not occur within three years of the initial special-status plant survey, additional floristic surveys shall be repeated.

If special-status plants are not found during special-status plant surveys, no further action is required. If federally- and/or state-listed individuals and/or CRPR 1B or 2 plant populations are found during special-status plant surveys, the Mitigation Measures BIO-1(b) and BIO-1(c) shall be implemented.

BIO-1(b) Special-status Plant Species Avoidance, Minimization, and Mitigation

If federally-listed and/or state-listed individuals, and/or CRPR 1B or 2 plant populations are found during special-status plant surveys [pursuant to Mitigation Measure BIO-1(a)], and would be directly impacted by development, then the project shall be re-designed to avoid impacting listed plant species or CRPR 1B or 2 populations, where feasible and compatible with project design. Rare and listed plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a City-approved biologist based on species location in relation to the construction area and level of disturbance from construction activities, to protect them from harm. Prior to initiation of construction activities the project proponent shall submit a site plan depicting the location(s) of special-status plants and avoidance buffers to the City for review and verification. The City-approved biologist(s) shall possess a degree in biology, ecology, botany, or a related field, and have demonstrated knowledge and experience with native plant and wildlife species of the region, their habitats, and applicable environmental regulations. The biologist shall have prior experience conducting pre-construction surveys,

construction monitoring, and implementing mitigation measures and permit conditions similar to those required for this project. If special-status plants can be avoided, no further action is required. If federally- and/or state-listed individuals and/or CRPR 1B or 2 plant populations cannot be avoided, then Mitigation Measure BIO-1(c) shall be implemented.

BIO-1(c) Habitat Mitigation and Monitoring Plan

If federally- and/or state-listed plants, non-listed special-status plant populations, sensitive natural communities, or waters of the US and/or State cannot be avoided and will be impacted by development, all impacts shall be mitigated by the implementing entity at a minimum ratio of 1:1 for occupied habitat area as a component of habitat restoration or through compensatory mitigation. A habitat mitigation and monitoring plan (HMMP) shall be prepared by a City-approved biologist and submitted by the project proponent to the City for review and verification prior to the issuance of building permits. The project proponent shall also obtain all necessary permits from USFWS and/or CDFW and provide proof of take authorization, if required, to the City for verification prior to issuance of any permits for ground disturbing activities. The HMMP shall include, at a minimum, the following components:

1. Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type).
2. Goal(s) of the compensatory mitigation project (type[s] and area[s]) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type[s] to be established, restored, enhanced, and/or preserved).
3. Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions, and values).
4. Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan).
5. Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule).
6. Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports).
7. Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type or other industry standards as determined by a qualified restoration specialist.
8. An adaptive management program and remedial measures to address any shortcomings in meeting success criteria.
9. Notification of completion of compensatory mitigation and agency confirmation.
10. Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).
11. All nursery plants used in restoration shall be inspected for sudden oak death.

Within 30 days of completion of monitoring, a final monitoring report shall be submitted to the City for review and verification, documenting compliance with the HMMP and achievement of success criteria.

BIO-1(d) Worker Environmental Awareness Program

Prior to initiation of construction activities at Site 49, 42, 43, 47, 50, 55, and additional parcels A1, A3, and A4 (including staging and mobilization), the project proponent for development shall arrange for all personnel associated with project construction for the applicable phase to attend Worker Environmental Awareness Program (WEAP) training, conducted by a City-approved biologist, to aid workers in recognizing special-status biological resources that may occur in the construction area. The specifics of this WEAP shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction. All employees shall sign a form provided by the trainer indicating they have attended the WEAP training and understand the information presented to them. The form shall be submitted to the City to document compliance prior to the initiation of ground disturbing activities, and as new personnel are added to the construction site.

BIO-1(e) Northern California Legless Lizard Avoidance and Minimization

A pre-construction clearance survey shall be conducted in undeveloped areas of Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4 for Northern California legless lizard by a City-approved biologist within 48 hours prior to the start of construction (including staging and mobilization). The survey shall cover the entire disturbance footprint within suitable habitats with moist loose soil, plus a minimum 100-foot buffer, where permissible, and should identify all special-status wildlife species observed on the project site. During the pre-construction survey the biologist shall inspect under logs, leaf litter, or other suitable refuge. If Northern California legless lizards are identified, individuals shall be relocated by a biologist to suitable cover with loose soils a minimum of 500 feet from the project site, as accessible. A written report demonstrating compliance with the pre-construction clearance survey requirement, including a description of all individuals identified and relocated during the survey, shall be submitted to the City for review and verification prior to the start of construction.

BIO-1(f) Pre-construction Bat Surveys and Maternity Roost Avoidance

Prior to project activities at Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4, a qualified, City-approved bat specialist shall conduct a habitat assessment to determine if bat roosting habitat occurs in or near the project area. Bat specialists shall be knowledgeable in bat ecology and identification, and shall have demonstrated experience conducting pre-construction surveys, monitoring construction activities, and implementing mitigation measures for bats on projects similar in scope and setting. If it is determined that the project area may contain or occur within 100 feet of potential day roosting habitat or 300 feet of potential maternity roosting habitat, a qualified bat specialist shall conduct a focused bat emergence survey within these areas no more than 30 days prior to construction or vegetation removal (plus a 100-foot buffer as access allows). The survey shall be conducted at least 1 hour before sunset and up to 3 hours after sunset, at a minimum. Acoustic recognition technology (such as SonoBat software or similar technology) shall be used during the survey to maximize detection of bats. The qualified bat specialist shall identify and demarcate habitat (i.e., trees or structures) containing daytime and/or nighttime roosts, and any maternity roosts. Survey results, including negative findings, shall be provided to the City within 30 days of completion of the survey.

Depending on the survey results, a qualified bat specialist shall identify potentially significant effects of the project on bats and determine which measures below are necessary to reduce impacts to a less-than-significant level. A report of the survey results and proposed minimization measures shall be submitted to the City for review and verification. Measures to avoid and minimize impacts to bats may include the following:

- If maternity roosts are observed, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are ready to fly out of the roost (March 1 to September 30). If tree removal is required during the maternity roosting season, trees potentially supporting an active maternity roost shall be closely inspected by a qualified bat specialist to determine the presence or absence of roosting bats. Inspection of each tree shall occur no more than 7 days prior to tree disturbance, and inspection results, including negative findings, shall be provided to the City within 7 days of completion of the inspection. Trees determined to be supporting maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 300 feet of or directly under or adjacent to an active maternity roost, and the non-disturbance buffer shall only be reduced at the discretion of a qualified bat specialist based on species location in relation to the construction area and level of disturbance from construction activities. The minimum buffer shall not be less than 50 feet. Work shall not occur between 30 minutes before sunset and 30 minutes after sunrise.
- If the removal of a tree containing potential roosting habitat for leaf dwelling bat species is required, the tree shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may be present, the tree shall be gently nudged two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a qualified bat specialist. If it is determined that the removed tree contains a bat roost, the tree shall not be immediately bucked or mulched. A period of at least 24 to 48 hours shall elapse prior to such operations to allow bats to escape.
- If the removal of a tree containing potential roosting habitat for trunk or crevice dwelling bat species is required, the tree shall be removed under the direction of a City-approved bat specialist using a two-step tree removal process conducted over two consecutive days. On the first day, the tree's non-habitat branches shall be trimmed using handheld equipment only (no heavy machinery), such as chainsaws. The noise and vibration disturbance, together with the visible alteration of the tree, is effective in causing bats that emerge nightly to feed to not return to the roost. The remainder of the tree shall be removed on the second day.
- If the alteration or removal of structures (i.e., buildings) containing potential roosting habitat for bats is required, a qualified bat specialist shall conduct a survey of all structures no more than 14 days prior to demolition. If no signs of bat roosting activity are observed, no further actions shall be required. If bats or signs of bat roosting activity are observed, a City-approved bat specialist shall prepare specific recommendations for and the project proponent shall implement the recommended methods of humane eviction such as partial dismantling to allow bats to abandon the roost, or installation of one-way doors. Removal of structures containing potential roosting habitat shall be monitored for compliance with the recommended methods and success of eviction by a City-approved bat specialist. If bats are not successfully evicted, the bat specialist shall stop work, reassess exclusion methods, and demolition may not continue until bats have been successfully evicted.

- If a roost is observed being used by many bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed shall depend on the size of the hibernaculum and shall be determined through consultation with CDFW.
- A monitoring report shall be submitted to the City within seven days of activities requiring potential roost removal. The report shall include a summary of dates of monitoring, methods used, findings (including species observed, if known, and roost activity), and confirmation of compliance with applicable avoidance and minimization measures.

BIO-1(g) Monarch Butterfly Avoidance and Minimization

Project construction activities at Sites 42 and 43, including equipment staging, grading, and construction, shall be avoided during the monarch butterfly overwintering season between October 15 through March 15, if practicable. In the event project construction activities cannot be avoided during the overwintering season, the project proponent shall retain a City-approved biologist to conduct a survey for roosting monarch butterflies within seven days prior to initiation of construction activities to determine their presence/absence.

If no monarch butterflies are observed during pre-construction surveys, no further actions are necessary. In the event construction pauses for a period of 7 days or more, if construction is planned to restart during the monarch butterfly overwintering season (October 15 through March 15), the project proponent shall retain a City-approved biologist to conduct a new survey in accordance with the requirements of this mitigation measure.

If construction activities occur during the overwintering season and monarch butterflies are present, the City-approved biologist shall establish a protective buffer, ranging from 100 to 300 feet from the roosting site in which monarch butterflies are aggregating based on species location in relation to the construction area and level of disturbance from construction activities. The buffer shall be delineated on site by the biologist with flagging or staking visible by construction personnel. The construction contractor shall ensure no construction occurs within the protective buffer, including staging of equipment or stopping or idling in the buffer, during the overwintering season. In the event construction activities, or other use of equipment, is needed to work within the buffer, the City-approved biologist shall be present on site to monitor construction activities and determine if the work is disturbing the aggregated butterflies (e.g., aggregations begin to disperse in response to noise or vibration from construction). If the biologist determines the work is disturbing the butterflies at any time, the biologist shall stop work within the protective buffer. The biologist shall have the authority to direct construction activities and can reinitiate construction activities when the butterflies no longer show signs of being disturbed. In addition, due to the regular movement of the butterflies and locations of the aggregations, the biologist shall have the discretion to adjust the protective buffers within the 100- to 300-foot required buffer range, as necessary, based on species location in relation to the construction area and level of disturbance from construction activities.

BIO-1(h) Nesting Bird Avoidance

Ground disturbance and vegetation removal activities shall be restricted to the non-breeding season for birds (September 16 to January 31), when feasible. For ground disturbance and vegetation-removal activities occurring during the bird nesting season (February 1 to September 15), general pre-construction nesting bird surveys shall be conducted by a City-approved biologist not more than seven days prior to construction activities involving ground clearing, vegetation removal/trimming, or building demolition. The surveys shall include the disturbance area plus a 200-foot buffer around

the site, where feasible, and a 500-foot buffer for raptors. If active nests are located, an appropriate avoidance buffer shall be established within which no work activity would be allowed that would impact these nests. The avoidance buffer shall be established by the City-approved biologist on a case-by-case basis based on the species and site conditions. In no case shall the buffer be smaller than 50 feet for non-raptor bird species, or 200 feet for raptor species. Larger buffers may be required depending on the status of the nest and the construction activities occurring near the nest. The buffer area(s) shall be closed to all construction personnel and equipment until juveniles have fledged and until the nest is inactive. A City-approved biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. If there are delays in on-site activities for more than 14 days during the breeding season, an additional survey shall be required prior to the start of work. A report of the survey results and any proposed avoidance buffers shall be submitted to the City for review and verification prior to the initiation of construction activities.

BIO-1(i) Invasive Weed Prevention

For individual development projects where activity would occur in undeveloped areas at Sites 47, 49, 50, and 55, and additional parcels A3 and A4, landscape plans approved by the City Community Development Department as part of a development permit applications shall not include noxious, invasive, and/or non-native plant species that are recognized on the federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Moderate and High Risk Lists. During construction the project proponent shall:

- Limit site access and parking, equipment storage and stationary construction activities to the designated staging areas to the maximum extent feasible.
- Prior to staging equipment on-site, clean all equipment caked with mud, soils, or debris from off-site sources or previous project sites to avoid introducing or spreading invasive exotic plant species. When feasible, remove invasive exotic plants from the individual project site. All equipment used on the premises should be cleaned prior to leaving the site for other projects.
- All disturbed areas requiring hydroseeded stabilization shall utilize a mix of locally native species, as feasible, upon completion of work in those areas.
- In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six weeks since ground disturbing activities ceased.
- If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a City-approved biologist and the City.

Within 30 days of project completion, a report shall be submitted to the City for review and verification documenting compliance with the invasive weed prevention measures above.

Significance After Mitigation

Implementation of Mitigation Measures BIO-1(a) through BIO-1(c) would reduce impacts to special-status plants by requiring pre-construction plant surveys, avoidance measures, and compensatory mitigation where avoidance is not feasible. Surveys would confirm the presence of special-status plants, allowing for project modifications to minimize direct impacts. Where avoidance is infeasible, an HMMP would provide compensatory mitigation to restore or enhance suitable habitat at a ratio determined in coordination with CDFW and/or USFWS, ensuring no net loss of plant populations. With implementation of these measures, impacts to special-status plants would be less than significant.

Implementation of Mitigation Measures BIO-1(d) through BIO-1(h) would reduce impacts to special-status wildlife by requiring a WEAP, pre-construction surveys, avoidance measures, and minimization where avoidance is not feasible. The WEAP would aid workers in recognizing special-status resources and project requirements during construction and preconstruction surveys would identify special-status species and nesting birds within the work area. Northern California legless lizard, bat maternity roosts, and monarch butterfly avoidance and minimization measures would reduce impacts to these species through relocation of legless lizard, tree removal/demolition under the direction of a qualified bat biologist, and seasonal avoidance of monarch butterfly. Avoidance buffers under the direction of a City-approved biologist would reduce impacts to nesting birds.

Implementation of Mitigation Measure BIO-1(i) would reduce impacts to critical habitat for Yadon's piperia by requiring non-invasive landscaping and avoidance of invasive weed introduction.

With implementation of Mitigation Measure BIO-1(a) through BIO-1(i), impacts to special-status species and nesting birds would be reduced to a less-than-significant level.

Threshold 2:	Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Impact BIO-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SENSITIVE NATURAL COMMUNITIES AND RIPARIAN HABITAT IDENTIFIED IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS, OR BY THE CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE OR US FISH AND WILDLIFE SERVICE. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Construction

Development facilitated by the project could result in direct and indirect impacts to sensitive Monterey pine communities and riparian habitat within undeveloped areas of Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4. Monterey pine forest on the Monterey Peninsula is one of three naturally occurring populations and is estimated to encompass approximately 1,260 acres (County of Monterey 2008: Table 4.9-1).

Direct impacts to degraded Monterey pine communities at Sites 47, 50, and 55, and at additional parcel A1 would occur where individual development projects may remove small, fragmented patches of Monterey pine habitat. In comparison with the larger contiguous Del Monte Forest and Rip Van Winkle Open Space, these patches are degraded due to edge effects such as pedestrian encroachment, establishment of non-native ornamental plant species, and residential and commercial use in the understory. Additionally, Pacific Grove Municipal Code Section 12.20.020(a) includes protections for Monterey cypress and Monterey pine trees, requiring a tree removal permit and replacement, consistent with the city-wide canopy cover goal of 33 percent, which would limit the number of trees removed as a result of project implementation. Direct impacts to degraded Monterey pine habitat at these sites would therefore be less than significant.

Direct impacts to high-quality Monterey pine forest could occur at Site 49 and additional parcels A3 and A4, and to riparian habitat along the intermittent stream at Site 49 and potential drainage on additional parcels A3 and A4. Monterey pine forest in these locations is of higher quality, with less disturbance and greater ecological integrity. Given the restricted distribution and limited extent of both resources, direct loss of riparian habitat and high-quality Monterey pine forest at these sites would be a potentially significant impact. These impacts would be mitigated through

implementation of Mitigation Measures BIO-1(a) through BIO-1(c), as discussed under Impact BIO-1 above.

Given their location adjacent to the Del Monte Forest or Rip Van Winkle Open Space, significant indirect impacts to Monterey pine forest and riparian habitat could occur at Sites 49, 50, and 55, and additional parcels A3 and A4 through the introduction and spread of non-native invasive species during construction activities. Invasive plant species seeds could be introduced through muddy or dirty construction equipment, staging areas, or other construction activities, and thereby spread throughout the high-quality habitat within the Del Monte Forest or Rip Van Winkle Open Space. These potential indirect impacts would be potentially significant but would be reduced to a less-than-significant level with implementation of Mitigation Measure BIO-1(i), as discussed under Impact BIO-1 above, which requires invasive species prevention and control measures.

Operation

Development facilitated by the project would result in the addition of residential units and commercial space in the project area. Once a site has been developed or re-developed, these uses typically result in minor to negligible operational impacts to riparian habitat or sensitive natural communities, often associated with edge effects, similar to the conditions currently existing on the sites occurring within or adjacent to natural communities. Therefore, impacts to sensitive natural communities from project operation would be less than significant.

Mitigation Measures

BIO-1(a) Special-status Plant Species Surveys

Refer to Impact BIO-1, above.

BIO-1(b) Special-status Plant Species Avoidance, Minimization, and Mitigation

Refer to Impact BIO-1, above.

BIO-1(c) Habitat Mitigation and Monitoring Plan

Refer to Impact BIO-1, above.

BIO-1(i) Invasive Weed Prevention

Refer to Impact BIO-1, above.

Significance After Mitigation

Mitigation Measure BIO-1(i) would require measures to prevent the introduction of invasive species at Sites 49, 50, and 55, and additional parcels A3 and A4. These measures include cleaning of equipment, hydroseeding disturbed areas with native plants, removing invasive species before seeding, and landscaping that excludes invasive species. Mitigation Measure BIO-1(c) would require loss of Monterey pine forest at Site 49, and additional parcels A3 and A4, and riparian habitat at Site 49 and additional parcels A3 and A4, be mitigated at a minimum 1:1 ratio and through preparation and implementation of a HMMP that outlines the mitigation site, goals, implementation, maintenance, monitoring, success criteria, and adaptive management measures.

Implementation of Mitigation Measures BIO-1(c) and BIO-1(i) would minimize impacts to sensitive Monterey pine forest and riparian habitat within and adjacent to development facilitated by the project by requiring mitigation for impacts to sensitive natural communities and avoiding the introduction of invasive species. Implementation of Mitigation Measures BIO-1(a) through BIO-1(c) would similarly minimize potential impacts to sensitive natural communities through preliminary detection and implementation of avoidance, minimization, and mitigation measures. Overall, implementation of these measures would reduce project impacts to sensitive natural communities and riparian habitat to a less-than-significant level.

With implementation of Mitigation Measure BIO-1(a) through BIO-1(c), and BIO-1i), impacts to sensitive natural communities and riparian habitat would be reduced to a less-than-significant level.

Threshold 3:	Would the project 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?

Impact BIO-3 DEVELOPMENT FACILITATED BY THE PROJECT COULD HAVE A SUBSTANTIAL ADVERSE EFFECT ON STATE- OR FEDERALLY-PROTECTED WETLANDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Construction

Approximately 271 linear feet of an unnamed intermittent stream is mapped within Site 49, and a drainage may be present at additional parcels A3 and A4. These features, and any associated riparian corridor, may be waters of the US and/or State, and fall under the jurisdiction of the USACE, CDFW, and/or RWQCB. Development facilitated by the project could directly impact these features through fill, excavation, or other ground-disturbing activities. These activities could result in the loss of jurisdictional waters, which would be a potentially significant impact. No other protected waters or wetlands are expected within housing sites or additional parcels.

As discussed in Section 4.8 *Hydrology and Water Quality*, development facilitated by the project would be required to comply with the Construction Stormwater General Permit requirements and Pacific Grove Municipal Code requirements, as well as implementation of required construction BMPs pursuant to a SWPPP and/or the City, would minimize pollutant discharge in stormwater runoff. Additionally, some of the project area discharges to the Pacific Grove Area of Biological Significance (ASBS), the Pacific Grove ASBS Compliance Plan mandates weekly inspection of construction sites by City officials to ensure adequate stormwater management measures are implemented.

Construction activities on Site 49 and additional parcels A3 and A4 (outside the ASBS) could result in indirect impacts to the intermittent stream, including stormwater runoff, sedimentation, and pollutants from construction. These impacts could degrade water quality and alter hydrologic conditions, potentially affecting sensitive aquatic habitats. This indirect impact would be potentially significant.

Direct and indirect impacts to the intermittent drainage at Site 49 and potential drainage additional parcels A3 and A4 would be potentially significant, and Mitigation Measure BIO-1(c), as discussed under Impact BIO-1 above, and Mitigation Measures BIO-3(a) and BIO-3(b) would be required. Development facilitated by the proposed project at all other housing sites and additional parcels would not affect protected waters or wetlands, and impacts would be less than significant.

Operation

Development facilitated by the project would result in the addition of residential units, commercial space, and new impervious surfaces in the project area. As discussed in Section 4.8 *Hydrology and Water Quality*, development facilitated by the project would be required to comply with the City's National Pollutant Discharge Elimination System Permit (No. R3-2013-0032), and would be required to implement low impact development site design measures related to the creation or replacement of impervious surfaces, including, but not limited to, use of porous pavement, vegetated swales, green roofs, rain barrels and cisterns, tree planting, source control, runoff reduction, stormwater treatment, and hydromodification management. Once a site has been developed or redeveloped, the proposed residential and commercial uses do not typically result in operational impacts to jurisdictional areas. Therefore, the impact from project operation on jurisdictional waters would be less than significant.

Mitigation Measures

BIO-1(c) Habitat Mitigation and Monitoring Plan

Refer to Impact BIO-1, above.

BIO-3(a) Jurisdictional Delineation

Prior to issuance of grading permits, a City-approved biologist shall complete a jurisdictional delineation of wetland features at Site 49 and additional parcels A3 and A4. The jurisdictional delineation shall determine the extent of the jurisdiction for CDFW, USACE, and/or RWQCB, and shall be conducted in accordance with the requirements set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the city. The delineation shall be used to inform design development in a manner that avoids impacts to jurisdictional waters to the maximum extent practicable. If jurisdictional waters are identified within 100 feet of proposed limits of work, Mitigation Measure BIO-3(b) shall be required. If jurisdictional waters are identified within proposed limits of work and cannot be avoided, Mitigation Measure BIO-1(c) shall be required. The project proponent shall also be required to apply for and obtain applicable federal and State permits for impacting jurisdictional waters, and shall implement all conditions of such permit(s).

BIO-3(b) Waters and Wetlands Impact Avoidance and Minimization

To avoid and/or minimize potential indirect impacts to jurisdictional waters and water quality, the City shall require following BMPs to be implemented by the project proponent during construction within 100 feet of jurisdictional areas at Site 49 and additional parcels A3 and A4:

- Any material/spoils generated from project activities shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate.
- All vehicles and equipment shall be in good working condition and free of leaks. The contractor shall prevent oil, petroleum products, or any other pollutants from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.

- All re-fueling, cleaning, and maintenance of equipment shall occur at least 100 feet from jurisdictional areas.
- Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank.
- Prevent the discharge of silt or pollutants off the site when working adjacent to jurisdictional areas. Install BMPs (i.e., silt barriers, sand bags, straw bales) as appropriate.
- Any spillage of material shall be stopped if it can be done safely. The contaminated area shall be cleaned and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative shall be notified.
- Work during times of precipitation shall be avoided to the maximum extent possible.

Within 30 days of completion, a report shall be submitted to the City for review and verification, documenting compliance with the above measures and the National Pollutant Discharge Elimination System Permit.

Significance After Mitigation

Mitigation Measure BIO-3(a) would require a biologist to conduct a jurisdictional delineation to determine the extent of jurisdictional waters at Site 49, and would require the project proponent to apply for and obtain appropriate permits from USACE, RWQCB, CDFW, or other applicable agencies and to implement the conditions of those permits. If impacts to jurisdictional waters cannot be avoided, Mitigation Measure BIO-1(c) would require preparation of an HMMP and compensatory mitigation for loss of waters of the US and State at a minimum 1:1 ratio.

Mitigation Measure BIO-3(b) would require BMPs within 100 feet of jurisdictional waters, including sediment barriers, proper material storage, vehicle maintenance protocols, and spill response measures to prevent contaminants from reaching the stream. With implementation of Mitigation Measure BIO-3(b), indirect impacts to water quality and hydrology on jurisdictional waters would be reduced to a less than significant level. With implementation of Mitigation Measures BIO-1(c), BIO-3(a), and BIO-3(b), potential impacts to waters of the US and State would be reduced to a less-than-significant level.

Threshold 4:	Would the project 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?

Impact BIO-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT SUBSTANTIALLY IMPEDE WILDLIFE MOVEMENT AREAS OR NATIVE WILDLIFE NURSERY SITES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project area does not include recognized Natural Landscape Blocks or Essential Connectivity Areas. Existing development in the project area likely deters wildlife movement through the housing sites, upzoning areas, and additional parcels, and development facilitated by the project within the housing sites, upzoning areas, and additional parcels would not substantially alter the area relative to wildlife movement. Urban and disturbance tolerant species such as Columbian blacktail deer (*Odocoileus hemionus columbianus*) commonly move through developed areas of the City, between open areas at the Del Monte Forest, George Washington Park, Asilomar State Beach, and Point Pinos. Development within undeveloped areas at Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4 would not create a substantial barrier for blacktail deer within the City. Given the large areas of open space within the Del Monte Forest and Rip Van Winkle Open Space development

facilitated by the project is not expected to result in substantial changes to the genetic connectivity among local populations of wildlife, or within a broader regional context. Additionally, marine areas are sufficiently distanced from individual development sites such that no impacts to Pacific harbor seal pupping sites would occur. Impacts to wildlife movement and nursery sites would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 5:	Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE SUBJECT TO THE CITY'S POLICIES AND REQUIREMENTS PROTECTING BIOLOGICAL RESOURCES, INCLUDING ESHAS AND PROTECTED TREES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Construction

As discussed in Section 4.3.1(e), *Natural Communities and Habitats*, all of the sites located within the Coastal Zone (Sites 10, 11, 12, 19, and 56, and portions of the Central-Eardley and Sunset Service Commercial Districts) are developed, mapped as low sensitivity, and consistent with the LCP land use designations for commercial and residential development. Therefore, these sites and areas are not mapped as ESHAs. Site 52 is the nearest site to coastal habitats, located approximately 420 feet from Shoreline Park and the Pacific Ocean. Site 47 is approximately 0.14-mile east of potentially sensitive dune habitats at the Asilomar Dunes (west of Asilomar Avenue). These coastal beaches and dunes are mapped as ESHA under the City's Local Coastal Program (City of Pacific Grove 2015: 3-36, Figure 3-5). Additionally, the Sunset Service Commercial District, Site 50, and 55, and Presidio-Austin Commercial District, and additional parcels A3 and A4 are directly adjacent to ESHA mapped in the Del Monte Forest Area Land Use Plan (County of Monterey 2012: Figure 6a, Figure 6f). No development is proposed within areas mapped as ESHA; however, off-site impacts due to the accidental introduction of invasive species during construction activities could occur, and this impact would be potentially significant and Mitigation BIO-1(i), as discussed under Impact BIO-2 above, would be required.

Trees protected by the City's Municipal Code under Chapter 12.20, *Protected Trees*, occur throughout the project area and may be present on individual sites. The Municipal Code includes tree removal and protection requirements, including permitting, and root zone protection. Removal of protected trees must not result in less than a total canopy cover of 33 percent on each individual property. If development facilitated by the project would reduce the canopy cover below the City's canopy cover target, the City would require the protected tree to be replaced. Pacific Grove Municipal Code Section 12.20.060, *Wildlife Protection*, also requires that tree pruning and removal activities take place outside of the nesting season of listed threatened, endangered, or special-status species. Compliance with the City's Municipal Code would ensure the project would not conflict with the City's policies protecting biological resources, and impacts would be less-than-significant.

Operation

Development facilitated by the project would result in the addition of residential units and commercial space in the project area. Once a site has been developed, these uses do not typically conflict with local policies or ordinances protecting biological resources.

Mitigation Measures

BIO-1(i) Invasive Weed Prevention

Refer to Impact BIO-1, above.

Significance After Mitigation

Mitigation Measure BIO-1(i) would prevent introduction of invasive species through cleaning of equipment, hydroseeding disturbed areas with native plants, removing invasive species before seeding, and landscaping that excludes invasive species. Implementation of Mitigation Measure BIO-1(i) would avoid conflicts with the City's Local Coastal Program, and reduce these impacts to a less-than-significant level.

Threshold 6:	Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact BIO-6 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN. THERE WOULD BE NO IMPACT.

The project area is not within a Habitat Conservation Plan, Natural Community Conservation Plan, or any other local, regional, or State Habitat Conservation Plan. No conflict with any of these plans would occur and there would be no impact.

Mitigation Measures

No mitigation is required.

4.3.4 Cumulative Impacts

The geographic scope for cumulative biological impacts is the Monterey Peninsula, encompassing the entirety of Pacific Grove, adjacent unincorporated areas (including the Del Monte Forest and Pebble Beach), and the City of Monterey. This geographic scope is appropriate based on the known geographic distribution of special-status species and sensitive biological resources in the region. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact biological resources.

Cumulative development, including both individual projects and plan-level buildout, would have limited, site-specific impacts to biological resources throughout the Monterey Peninsula. Most of the projects listed in Table 3-1 would not result in substantial impacts to special-status species given that proposed development locations are within developed areas. Individual cumulative projects would undergo design review for compliance with applicable state and federal laws, and City and County municipal codes and ordinances, and may also undergo environmental review to mitigate

impacts to the extent feasible. Cumulative impacts to special-status species (Threshold 1) would be less than significant.

Cumulative development could adversely impact sensitive natural communities and ESHAs if development would result in the introduction of invasive weedy species, removal of protected trees, or result in loss of high-quality Monterey pine forest. Cumulative development would be required to comply with the City and County LCPs, which limit development in sensitive habitats within the Coastal Zone. Cumulative development would also be required to adhere to applicable municipal code tree removal and replacement requirements. No cumulative projects involving substantial development (i.e., more than four housing units, 1,000 sf of commercial use, or 10 hotel rooms) are planned within the Del Monte Forest. Cumulative development would not result in a significant cumulative impact related to sensitive communities, critical habitat, ESHA, or locally protected resources (Thresholds 2 and 5).

Cumulative development could adversely impact jurisdictional waters and wetlands on individual sites where such features are present. Such cumulative development may require USACE, RWQCB, and/or CDFW permitting. However the state's strict mitigation requirements aim to ensure no-net-loss of wetlands, and would be enforced by the permitting agencies. Pursuant to compliance with these existing permitting requirements, cumulative impacts related to waters or wetlands would be less-than-significant (Threshold 3).

Cumulative development has the potential to interfere substantially with the movement of native resident or migratory fish or wildlife species. However, as described under Impact BIO-4, the project area does not contain significant corridors for wildlife movement. Regional corridors occur within the Monterey Peninsula; however, these corridors largely occur within the Del Monte Forest, Rip Van Winke Open Space, and lands already preserved (City and County parks and state beaches). Cumulative development would not significantly change the level of existing barriers for wildlife movement in the region and cumulative impacts related to wildlife movement (Threshold 4) would be less than significant.

As described under Impact BIO-6, the project area is not located within an adopted Habitat Conservation Plan or Natural Community Conservation Plan and therefore the project would result in no impact related to conflicts with such plans. Accordingly, the project has no potential to contribute to cumulative impacts related to conflicts with approved conservation plans, and these impacts are not discussed further (Threshold 6).

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4.4 Cultural Resources

This section provides an overview of the existing conditions and potential impacts related to cultural resources, including historical and archeological resources as well as human remains.

4.4.1 Setting

a. Indigenous History

The project area lies in the Central Coast archaeological region (Jones et al. 2007; Glassow et al. 2007), which has been defined as extending from south of San Francisco Bay to the northern edge of the California Bight (Jones et al. 2007: 125). Following Jones et al. (2007: 137), the precontact cultural chronology for the Central Coast can be generally divided into six periods: Paleo-Indian (circa 10000-8000 before common era [BCE]), Millingstone/Early Archaic (8000-3500 BCE), Early (3500-600 BCE), Middle (600 BCE-1000 common era [CE]), Middle-Late Transition (1000-1250 CE), and Late (1250 CE-contact [circa 1769 CE]).

Paleo-Indian Period (10,000 – 8000 BCE)

When Wallace developed the Early Man horizon (referred to herein as the Paleo-Indian Period) in the 1950s, little evidence of human presence along the California coast prior to 6000 BCE existed. Archaeological work in the intervening years has identified numerous sites older than this date, and it is likely that more Paleo-Indian coastal sites are presently under water as it is estimated that 10,000 years ago sea levels were 15 to 20 meters lower than sea levels are today (Bickel 1978: 7; McLaren et al. 2019).

Most of the earliest accepted dates for occupation within the Central Coast are located in San Luis Obispo County. CA-SLO-1764 (Lebow et al. 2001), Cross Creek (CA-SLO-1797; Jones et al. 2002), and CA-SLO-832 (Jones and Ferneau 2002) near Pismo Beach, have produced radiocarbon dates from approximately 9,000 years ago (Jones and Ferneau 2002). One occupation site located in the Monterey Bay area, the Scotts Valley Site (CA-SCR-177), and one occupation site located in southern Santa Clara Valley (unnamed), have produced debated radiocarbon dates more than 9,000 years ago, ranging from 7,180 to 10,080 years ago (Cartier 1989; Fitzgerald and Porcassi 1966).

Typically, artifact assemblages from the Paleo-Indian Period lack groundstone implements and an abundance of faunal remains. However, assemblages at CA-SLO-1764 and CA-SLO-1797 indicate early use of millingstone technology alongside flaked stone artifacts (Lebow et al. 2001; Jones et al. 2002). Flaked stone tools are common in this period, such as the eccentric crescent, present in CA-SCR-177 abundantly, which is thus far exclusive to the Paleo-Indian Period (Cartier 1989). Furthermore, this period shows use of large side-notched points of the Central Coast Stemmed series which date to as early as 8,000 years ago (Justice 2002). Points of this type have been recovered at Cross Creek (CA-SLO-1797; Jones et al. 2002) and Little Pico Creek (CA-SLO-175; Jones and Waugh 1995). Additionally, a fluted point was reportedly found on the surface in Nipomo, San Luis Obispo County (Mills et al. 2005; Jones et al. 2007).

Millingstone/Early Archaic Period (8000 – 3500 BCE)

The Millingstone Period, as defined by Wallace (1955, 1978), is characterized by an ecological adaptation to collecting suggested by the appearance and abundance of well-made milling implements. Millingstones occur in large numbers for the first time in the region's archaeological

record and are even more numerous near the end of this period. Aside from millingstones, typical artifacts during this period include crude core and cobble-core tools, flake tools, large side-notched projectile points, and pitted stones (Jones et al. 2007).

The Millingstone Period within the Central Coast corresponds with King's (1990) Early Period of the Santa Barbara Channel area, although King's Early Period starts later and lasts longer (5,500 – 1,350 BCE). The Cross Creek site (CA-SLO-1797) in San Luis Obispo County is a Millingstone occupation site that returned radiocarbon dates as old as 8,350 BCE. This site represents one of the oldest expressions of the Millingstone pattern (Jones et al. 2002, 2007). Within the Elkhorn Slough of the Monterey Bay Area, CA-MNT-229 produced radiocarbon dates between 6,200 and 4,000 BCE (Jones and Jones 1992), and younger examples of the pattern can be found in CA-MNT-1232/H and CA-SCR-177 in the Monterey Bay area (Jones et al. 2007).

Forty-two sites dating to this period have been identified in various settings, including rocky coasts, estuaries, and nearshore interior valleys (Jones et al. 2007). The larger sites usually contain extensive midden deposits, possible subterranean house pits, and cemeteries. Most of these sites probably reflect intermittent use over many years of local cultural habitation and resource exploitation, with an emphasis on marine resources. Evidence at Elkhorn Slough (CA-MNT-229) confirms an early preference for estuarine and lacustrine settings. A lack of shell beads and flaked obsidian tools suggests low intensity inter-regional exchange (Jones and Jones 1992).

Early Period (3500 – 600 BCE)

An extensive series of shoreline midden deposits within the Central Coast region date to the Early Period, suggesting an increase in tribal settlement on the open coast (Jones and Waugh 1995, 1997; Jones et al. 2003). These include estuarine sites in San Luis Obispo County (CA-SLO-165) and open-coast sites in the Monterey Bay area (CA-MNT-73, CA-MNT-108, and CA-MNT-1228). Sites dating to this period are marked by large lithic artifact assemblages consisting of Central Coast Stemmed Series and side-notched projectile points. Square-stemmed and side-notched points have also been found in deposits at Willow Creek in Big Sur (CA-MNT-282), and Little Pico II on the San Luis Obispo coast (CA-SLO-175) (Jones and Ferneau 2002). This trend, first identified by Rogers (1929), has since become apparent at numerous sites throughout the Central Coast. In many cases, manifestations of this trend are associated with the establishment of new settlements (Jones et al. 2007).

The material culture recovered from Early Period sites within the Central Coast region provides evidence for continued use of inland plant and coastal marine resources. Artifacts include milling slabs and handstones, as well as mortars and pestles, which were used for processing a variety of plant resources. Bipointed bone gorge hooks were used for fishing. Assemblages also include a suite of Olivella beads, bone tools, and pendants made from talc schist. Square abalone shell (Haliotis spp.) beads have been found in Monterey Bay, but not in the Big Sur or San Luis Obispo areas (Jones and Waugh 1997: 122).

Shell beads and obsidian are hallmarks of the trade and exchange networks of the central and southern California coasts. The archaeological record indicates a substantial increase in the abundance of obsidian at Early Period sites in the Monterey Bay and San Luis Obispo areas (Jones and Waugh 1997: 124–126). Obsidian trade continued to increase during the following the Middle Period.

The Early Period shows an increase in hunting and fishing over the Millingstone Period, as evidenced by SLO-165, with rabbits and fish remains present in greater concentrations (Jones et al. 2007).

Middle Period (600 BCE – 1000 CE)

The Middle Period saw a population increase as a number of new settlements spanned throughout the Central Coast. Newly established settlements of this period include CA-MNT-108, CA-MNT-391, CA-MNT-1228, CA-SCR-7, CA-SLO-165, and CA-SLO-175 (Jones et al. 2007). During this period, evidence from CA-MNT-391 shows burials in a flexed position and associated burial items, including projectile points and bone gorges. Olivella shell beads are found in abundance associated with burials dating to the Middle Period (Hildebrandt 1997; Jones et al. 2007).

The Middle Period is generally characterized by a shift in subsistence patterns, including more abundant use of mortars and pestles as well as higher use of larger stemmed and notched projectile points. Additionally, the first appearance of circular shell and bone fishhooks and notched net sinkers were observed within sites dating to this period. Evidence shows that marine resources were still abundantly utilized, with an increase in pinniped faunal remains, such as fur seals (Jones and Ferneau 2002; Boone 2012). Faunal assemblages show that marine diets were supplemented with small mammals, such as rabbits (Jones et al. 2007). Additionally, evidence from macro botanical analysis indicates a shift from small seeds to a heavy reliance on acorns (Wohlgemuth 1996; Hildebrandt 1997).

Middle-Late Transition Period (1000 – 1250 CE)

The Middle-Late Transition Period is marked by relative instability and change, with major changes in diet, settlement patterns, and interregional exchange. The relatively ubiquitous Middle Period shell midden sites found along the Central Coast were abandoned by the end of the Middle-Late Transition Period; therefore, most Transition Period and Late Period sites were first occupied at this time (Jones and Ferneau 2002:213, 219). Instead of large year-round habitation patterns, Middle-Late and Late Period sites show smaller seasonal settlements (Boone 2012). CA-SLO-239 has been tentatively dated to the Middle-Late Transition Period and contains the only residential feature, a circular house floor (Jones et al. 2007).

During the Middle-Late Transition Period within the Central Coast region, projectile points diagnostic of both the Middle and Late Periods are found (Jones and Ferneau 2002:217). The points include large, contracting-stemmed types typical of the Middle Period, as well as Late Period small, leaf-shaped points, which likely reflect the introduction of the bow and arrow.

Late Period (1250 CE – Historic Contact)

Late Period sites are marked by small, finely worked projectile points, such as Desert side-notched and Cottonwood points, as well as temporally diagnostic shell beads. Although shell beads were typical of coastal sites, trade brought many of these maritime artifacts to inland locations, especially during the latter part of the Late Period (Jones et al. 2007).

Common artifacts identified at Late Period sites include bifacial bead drills, bedrock mortars, hopper mortars, lipped and cupped Olivella shell beads, and steatite disk beads. The presence of beads and bead drills suggest that low-level bead production was widespread throughout the Central Coast region (Jones et al. 2007).

Unlike the large Middle Period shell middens, Late Period sites are more frequently single-component deposits. There are also more inland sites, with fewer and less visible sites along the Pacific shore during the Late Period. However, one Late Period shell midden has been identified on the coast in Morro Bay (CA-SLO-23). The settlement pattern and dietary reconstructions indicate a lesser reliance on marine resources than observed for the Middle and Middle-Late Transition

Periods, as well as an increased preference for deer and rabbit (Jones et al. 2003). An increase in sites with bedrock mortars during the Late Period further suggests that nuts and seeds began to take on a more significant dietary role (Jones et al. 2007).

b. Post-Contact Setting

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769-1822)

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. Juan Rodriguez Cabrillo in 1542 led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968; Rolle 2003). The Spanish crown laid claim to Alta California based on the surveys conducted by Cabríllo and Vizcaíno (Bancroft 1885; Gumprecht 1999).

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The presidio at Monterey and Mission San Carlos Borromeo were established in 1770, although the mission was moved a year later to present-day Carmel (California Missions Foundation 2017; San Carlos Cathedral 2025). Monterey served as the capital of Baja and Alta California from 1776 until 1803. The pueblo of Monterey grew as residents expanded outside the royal presidio with Spanish soldiers marrying, raising families or retiring (Crane 1991; City of Monterey Museums 2019).

Construction of missions and associated presidios was a major emphasis during the Spanish Period in California to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns; just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles). Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish king (Livingston 1914).

Mexican Period (1822-1848)

Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Dallas 1955).

In 1822, residents of Alta California received word that Mexico had won its war for independence from Spain. At this time, the pueblo of Monterey had a population of several hundred and the newly established Mexican government decreed the California ports open to increased trade with foreigners under the constitution of 1824 (Bean 1968; Crane 1991).

Hallmarks of the Mexican Period in California are the secularization of mission lands, which was fully accomplished at the Carmel mission by 1835, the issuance of large land grants, and cattle ranching for the hide and tallow trade. Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land (Graffy 2010). As Mexico opened California to international trade, Monterey became the primary port of entry, and the exportation of hide and tallow was one of the most important parts of the economy (City of Monterey Museums 2019).

In 1883, Jose Maria Armenta, a soldier of the Monterey Presidio was granted Rancho Punta de los Pinos by the Mexican governor. The boundaries of the grant extended in a line from Point Aulones or "Abalone Point" (later known as Point Loeb, site of today's Monterey Bay Aquarium) to Cypress Point near Pebble Beach, including virtually all of the present-day boundaries of Pacific Grove. Jose Armenta died in 1834, and Rancho Punta de los Pinos became be the subject of numerous deed transfers and land claims that took decades to resolve.

Adjacent to Rancho Punta del los Pinos was Rancho El Pescadero, or "The Fisherman," granted to Fabian Barretto, a Mexican resident of Monterey, in March 1836. Its 4,426 acres included portions of the Del Monte Forest located south and east of the Point Pinos Rancho, as well as Cypress Point and what is today Pebble Beach. At both ranchos, the primary economic activity would have been comprised of cattle and sheep grazing, with Native Americans supplying most of the labor (Shumway 2007).

American Period (1848-Present)

The United States went to war with Mexico in 1846. During the first year of the war, John C. Fremont traveled from Monterey to Los Angeles with reinforcements for Commodore Stockton and evaded Californian soldiers in Santa Barbara's Gaviota Pass by taking the route over the San Marcos grade instead (Kyle 2002). The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period.

The Gold Rush brought a multitude of new settlers to California beginning in 1848, and in 1850 Monterey became one of the first counties in the newly established state, with the neighboring city of Monterey serving as the original county seat (City of Monterey Museums 2019). In 1854, the Point Pinos Lighthouse was constructed to help prevent ships running aground along the Pacific Grove coast. Today the lighthouse is both the oldest structure in Pacific Grove and the oldest active navigational aid on the West Coast.

Local History

The following brief historical context is largely developed from the City's adopted Historic Context Statement, which was prepared by Page & Turnbull, Inc. in 2011.

Early Development of Pacific Grove (1873 – 1902)

The area that encompasses present-day Pacific Grove was originally established by the Pacific Grove Retreat Association (PGRA) in 1875 as a Methodist Retreat Campground. The PGRA signed a deal with local entrepreneur David Jacks for 100 acres of land, and subsequently developed sections of the land with dormitories, an administrative office, grocery store, and bath house. By 1876, the PGRA was unsuccessful in selling the remaining, undeveloped portions of the 100 acres, and the unsold portions of Pacific Grove Retreat lots reverted to Jacks. In 1880, he sold the remaining land to the Pacific Improvement Company (PIC), and by 1881, eight families were living in Pacific Grove.

In 1883, PGRA and PIC signed a contract to sell and manage the land which led to greater development of the area with a school, library, the Hopkins Seaside Lab, and commercial buildings on Lighthouse Road, including the El Carmelo Hotel in 1887. In 1889, the Southern Pacific Railroad was constructed through Pacific Grove, and the same year the city was incorporated as Pacific Grove.

Pacific Grove Comes of Age (1903 – 1926)

In the 1900s, the city saw a large expansion in civic, commercial, and residential development. New businesses developed down Lighthouse Road between 1903 and 1910, including the Hotel Del Mar, Winston Building, and several other commercial buildings. One of the most transformative changes during this period began in 1904 when Lover's Point developed from a quiet wading and bathing area to a full tourist attraction and resort with a large bath house with a pool, several changing rooms, a bandstand, and Japanese teahouse. In 1906, a Carnegie land grant was obtained for the construction of a public library, which opened at its current location in 1908. Asilomar 'Refuge by the Sea' was created when PIC donated land to the YMCA. Pacific Grove also became home to artists, many of whom, from the *en plein air* school of painting, were looking for natural beauty. Among the community's notable *plein-air* artists, British water-colorist William Adam moved from Monterey to Pacific Grove, and the German painter Eugen Neuhaus also located here (Cannon 2012).

In 1919, Del Monte Properties became the successor agency to PIC and began to subdivide and sell lots for increased residential development, including the Pacific Grove Acres tract. In 1916, the site of the former Chinese fishing village was destroyed to create the Monterey Boatworks. During the post-World War I era, institutional development included an elementary school (now the Robert H. Down Elementary School) in 1923, the same year the Pacific Biological Laboratory was opened. As Lighthouse Avenue was being paved in 1924, large-scale commercial development expanded, and Holman's Department store opened. The advent of mass private automobile ownership accelerated commercial and residential development in this period.

City of Homes (1927 – 1945)

By the mid-1920s, Pacific Grove was touted as the "City of Homes." Residential development expanded in the final years of the "Roaring Twenties," but was curbed by the Great Depression, leading to an emphasis on civic projects and improvements, particularly recreation facilities. Facilities constructed during this time included the following: Pacific Grove Golf Links, Pacific Grove High School Auditorium, the further development of Lovers Point, the municipal ballpark, Pacific Grove Museum, a new post office, and a Chamber of Commerce building. In 1931, Julia Platt was elected Pacific Grove's first female Mayor (Marino 2024). Given the economic difficulties of the time, residential development was scant during this period. Nonetheless, the city expanded and included the development of two of the city's affluent subdivisions: the Spazier Subdivision in 1928

and Fairway Homes in 1932. Commercial development was also slow, but did include the completion of the First National Bank in 1930 and development spurred by the economic boon of nearby Cannery Row in Monterey.

Suburban Expansion (1946 – 1966)

Post-World War II development saw the largest and most rapid expansion of the city's population. Residential expansion included subdivisions in the western and southern ends. At the same time, the city's tourist infrastructure grew and hotels and motels were built to meet the demand. To respond to the growing population, civic infrastructure followed. In 1950, the Pacific Grove Youth Center was dedicated to Bing Crosby. The impact of the automobile continued, and older buildings were cleared for parking lots including the demolition of the Methodist-Episcopal Church in January 1963.

Modern Pacific Grove (1967 – present)

Pacific Grove's post war growth extended into the late 1960s and included the annexation of adjacent areas. A burst of growth followed, which peaked in 1972 and included the development of remaining large lots within the city. In response to the city's growth and ongoing demolition of older building, the Heritage Society of Pacific Grove was founded in 1975, and it became incorporated the following year. The city adopted its first Historic Preservation Ordinance in 1993.

In the 1980s, one of the most well-known computer software companies, Digital Research, Inc. was headquartered in Pacific Grove and employed 200 employees. Since that time, there has been little large-scale development. The City's population has remained relatively consistent since 1980 and has a current (2024) population of 14,966 residents (California Department of Finance 2024).

c. Known and Potential Cultural Resources

A review of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Office of Historic Preservation (OHP) Built Environment Resources Directory, and available information provided by the City regarding the local Historic Resource Inventory (HRI) was completed to identify known historical resources located in the project area, which spans the City of Pacific Grove, including all housing sites, upzoning areas, and additional parcels. For the purposes of this study, a known historical resource is a building, structure, site, or object that has been formally listed or recommended eligible for listing in the NRHP, CRHR, or a local register. The review identified roughly 500 known historical resources, including individual properties and historic districts, listed in or eligible for NRHP, CRHR, and Pacific Grove HRI, located throughout the project area. Research for this DEIR confirmed that some of the known historical resources are located on the housing sites, in upzoning areas, and on additional parcels. However, due to City database constraints and the presence of parcels that have not yet received an eligibility determination, it was not feasible to provide accurate accounting of which parcels in the housing sites, upzoning areas, and additional parcels contain known historical resources at the programmatic level.

There are also 56 known archaeological resources within the project area based on a recent review of data held by the Northwest Information Center. Archaeological resources include Native American-origin sites including but not limited to habitation sites, temporary camps, and shell middens, and post-contact sites such as Chinese fishing camps, historical refuse deposits, and other features associated with early development of the city. However, the location of archaeological

resources is confidential and therefore not discussed here further. Potential impacts to tribal cultural resources are discussed in Section 4.15, *Tribal Cultural Resources,* of this DEIR.

In addition, numerous potential historical resources are located in the project area. For the purposes of this DEIR, a potential historical resource is a property that meets the 45-year age threshold typically used for historical resources consideration, but has not been subject to a historical resources evaluation. A review of City-provided construction data and historical aerial photographs focused on the housing sites, upzoning areas, and additional parcels found that many of the properties in these areas meet the 45-year threshold for consideration as potential historical resources.

Additionally, the city contains one formal cemetery: the El Carmelo Cemetery. The cemetery was established in the late 1800s.

4.4.2 Regulatory Setting

a. Federal Regulations

National Register of Historic Places

Although the project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance federal, state and local history, archaeology, architecture, engineering and culture that exists in districts, sites, buildings, structures and objects. . Pursuant to 36 Code of Federal Regulations Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history

Criterion B: Is associated with the lives of persons significant in our past

Criterion C: Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service (NPS) recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

Location: The place where the historic property was constructed or the place where the historic event occurred

Design: The combination of elements that create the form, plan, space, structure, and style of a property

Setting: The physical environment of a historic property

Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory

Feeling: A property's expression of the aesthetic or historic sense of a particular period of time

Association: The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. NPS states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (NPS 1997:41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

b. State Regulations

California Environmental Quality Act

California Public Resources Code (PRC) Section 21804.1 requires lead agencies to determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the CRHR; a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g); or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the NRHP are automatically listed in the CRHR and are, therefore, historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a "unique archaeological resource" as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, 2) has a special and particular quality such as being the oldest of its type or the best available example of its type, or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources will be less than significant and need not be considered further (*CEQA Guidelines* Section 15064.5[c][4]). *CEQA Guidelines* Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

According to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5[b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (*CEQA Guidelines* Section 15064.5[b][2][A]).

If it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a][b]).

CEQA Guidelines Section 15126.4 stipulates an EIR shall describe feasible measures to minimize significant adverse impacts. In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impacts of the project. Generally, a project which is found to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Secretary of the Interior's Standards) is considered to be mitigated below a level of significance (*CEQA Guidelines* Section 15126.4[b][1]). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (*CEQA Guidelines* Section 15126.4[b][3]).

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and 4852. The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1[a]). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (PRC Section 5024.1[b]). Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California OHP 2011). Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California OHP 2011). Generally, the California OHP recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility (California OHP 1995: 2).

A property is eligible for listing in the CRHR if it meets one or more of the following criteria:

Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage

Criterion 2: Is associated with the lives of persons important to our past

Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values

Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history

California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined if the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification.

California Public Resources Code Section 5097.98

PRC Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant [MLD]) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

c. Local Regulations

Pacific Grove Municipal Code

Chapter 23.76 of the Pacific Grove Municipal Code provides regulations pertaining to historic preservation. It establishes the City's Historic Resources Committee, outlines the requirements for inclusion in the Pacific Grove HRI, and provides regulations for development involving properties listed in the HRI.

The City of Pacific Grove established the HRI to preserve and manage cultural resources within the City. The inventory is managed by the City of Pacific Grove Community Development Department, and the Historic Resources Committee has the authority to designate a proposed historic resource if it meets at least one of the following criteria:

a. Whether the structure has significant character, interest or value as part of the development, heritage or cultural characteristics of the city of Pacific Grove, the state of California, or the United States;
b. Whether it is the site of a significant historic event;
c. Whether it is strongly identified with a person who, or an organization which significantly contributed to the culture, history, or development of the City of Pacific Grove;
d. Whether it is a particularly good example of a period or style;
e. Whether it is one of the few remaining examples in the City of Pacific Grove possessing distinguishing characteristics of an architectural type or specimen;
f. Whether it is a notable work of an architect or master builder whose individual work has significantly influenced the development of the City of Pacific Grove;

g. Whether it embodies elements of architectural design, detail, materials or craftsmanship that represent a significant architectural innovation;
h. Whether it has singular physical characteristics uniquely representing an established and familiar visual feature of a neighborhood, community, or of the City of Pacific Grove; or
i. Whether a resource with historical or cultural significance retains historic integrity.

Development on a property listed in the HRI is subject to certain regulations. Building additions and exterior alterations may be subject to review by the Community Development Department, and work shall be consistent with the Secretary of the Interior's Standards and the applicable section of the City's Architectural Review Guidelines. Demolition of a property listed in the HRI is subject to a historic demolition permit and approval of the Historic Resources Committee, which shall consider alternatives to demolition, including but not limited to relocation of the building proposed for demolition.

Pacific Grove General Plan

The current City of Pacific Grove General Plan, which was adopted in 1994, provides goals, policies, and implementation programs addressing cultural resources. The Historic and Archaeological Resources Element identifies and outlines goals and policies for cultural and historical resources, including the following:

Goal 1. Provide for the identification, protection, preservation, and restoration of Pacific Grove's heritage of Victorian and other late nineteenth century and early twentieth century historically and architecturally significant resources.

- **Policy 1.** Maintain an up-to-date official list of historic and architectural resources in the city.
- **Policy 2.** Regulate demolition of buildings of architectural or historical importance.
- **Policy 3.** Ensure that listed landmarks and cultural resources identified by ordinance are not demolished without notice and hearing.
- **Policy 4.** Encourage the moving of buildings proposed to be demolished when other means for their preservation cannot be found.
- **Policy 5.** Continue to seek funding that can be used to further the City's historic preservation goals and policies.
- **Policy 6.** Encourage individual efforts to restore historic neighborhoods and homes.
- **Policy 7.** Develop incentives for rehabilitation and restoration of existing resources.
- **Policy 8.** Incorporate the protection of historic resources in the immediate and long-range planning process.
- **Policy 9.** Promote the preservation and enhancement of historic neighborhoods, commercial areas, and governmental districts.
    - **Program K.** Employ land use and circulation policies that are effective in maintaining the character of historic areas.
    - **Program L.** Use the planning and review process to assure that historic residential areas, such as the Retreat, are maintained as cohesive, healthy neighborhoods.
    - **Program M.** Ensure that development in the Retreat, and in other historic areas, is consistent with maintaining their traditional scale and character.
    - **Program N.** Use the planning and review process to assure that the historic character and features of the commercial districts are maintained.

Goal 2. Foster an understanding and appreciation of Pacific Grove's history and architecture.

- **Policy 14.** Collect and maintain existing historical reference materials.

Goal 3. Enhance the visual and economic value of individual residential neighborhoods and commercial districts through a logical and sensible historic preservation plan.

- **Policy 18.** In applying historic preservation regulations, maintain a cooperative attitude toward the business community and an awareness of the need for successful businesses in this "city of homes."
- **Policy 19**. Encourage maintaining the character and historic features of the Downtown business district.

Goal 4. Protect Pacific Grove's archaeological resources.

- **Policy 20.** Support the enforcement of existing State and federal laws pertaining to pilfering of archaeological sites.
- **Policy 21.** Ensure the protection and preservation of artifacts in those areas already identified as containing archaeological remains (LUP, 2.4.4.1).
- **Policy 23.** Refer development proposals that may adversely affect archaeological sites to the California Archaeological Inventory.
  - **Program AA**. Inspect the surface of sites which potentially contain archaeological resources and evaluate site records to determine the extent of known archaeological resources.
  - **Program BB**. Require that all sites with potential resources likely to be disturbed by a proposed project be analyzed by a qualified archaeologist with local expertise.
  - **Program CC**. Require that a mitigation plan, adequate to protect the archaeological resource and prepared by a qualified archaeologist, be submitted for review and, if approved, be implemented as part of the project (LUP, 2.4.5.1).
  - **Program DD**. Identify sensitive sites early, so that archaeological resources can be considered and protected during the first phases of project design (LUP, 2.4.4.2).
  - **Program EE.** Where an archaeological site is in proximity to a project under review, City staff in conjunction with the California Archaeological Inventory will determine the particular qualities to be preserved and the methods of preservation.

Pacific Grove Local Coastal Program

The current City Pacific Grove Local Coastal Program, which was adopted in 2020, provides goals and policies relating to cultural resources. The Cultural Resources section of the Land Use Plan provides the following policies regarding cultural resources:

- **Policy CRS-2.** The City will ensure the protection, preservation, and proper disposition of archaeological resources within the Coastal Zone by assessing the potential impact of proposed development and ensuring, to the maximum extent feasible, that tribal concerns are considered before actions on proposed development are taken and that such impacts are avoided, minimized, or mitigated in conformity with the Coastal Act and other applicable legal requirements.

- **Policy CRS-3.** The City will assist developers and landowners by providing early identification of sensitive sites so that archaeological resources can be considered and protected during the early phases of project design. The City shall require new development to prepare an archaeological report by a qualified professional and, where appropriate, shall require mitigation measures to adequately protect and preserve potential archeological resources.
- **Policy CRS-7.** Rehabilitation, reconstruction, remodeling, or exterior modification of existing structures with historic or architectural significance in the Pacific Grove Retreat, and other neighborhoods in the Coastal Zone, shall relate to or retain the lines of the original design as much as possible and alterations shall provide evidence of substantial compliance to the Secretary of the Interior's Standards for historic resources.
- **Policy CRS-8.** Design review shall be required as part of the Coastal Development process in order to maintain historical continuity and visual harmony of new development within the Pacific Grove Retreat and other neighborhoods in the Coastal Zone.
- **Policy CRS-9.** In order to protect historic structures, unwarranted demolition shall be avoided by implementing standards for demolition.
- **Policy CRS-12.** Other historic or architecturally unique structures, including the Julia Morgan structures at Asilomar State Beach and Conference Grounds, shall be protected and maintained to the fullest extent possible. In order to preserve structures designed by Julia Morgan at the Asilomar State Beach and Conference Grounds, the City will encourage the State Historian to consult with the City on design review prior to any proposed exterior alterations.
- **Policy CRS-13.** The City will maintain and update the Historic Resources Inventory, with assistance from professional consultants and the Heritage Society of Pacific Grove, to provide a current description of the historic and visual character of the Pacific Grove Retreat and of the other historical neighborhoods in the Coastal Zone.

Shoreline Management Plan

The City adopted the Shoreline Management Plan (SMP) in June 2020, which outlines recommendations for protecting archaeological resources within and along the shoreline. The SMP states that a project that disturbs the soil along the shoreline has the potential to disturb archaeological sites but that meaningful mitigation efforts can reduce impacts.

The SMP states that whenever grading or excavation happens along the shoreline – even at previously disturbed sites – the Ohlone Costanoan Esselen Nation should be contacted and be invited to monitor the work. At the time of the preparation of the SMP, Esselen Tribe had not requested notification of projects under AB 52 and was therefore not invited to consult; however, the Esselen Tribe has subsequently requested AB 52 notification of projects and the City therefore contacts the Esselen Tribe in addition to the Ohlone Costanoan Esselen Nation. Refer to Section 4.15, *Tribal Cultural Resources,* for additional information on tribal cultural resources and consultation.

If human remains are discovered, work in the area shall halt and personnel shall adhere to Public Resources Code Section 5097.98 and State Health and Safety Code Section 7050.5. The SMP further states that the preference for tribal human remains is avoidance. If disturbance is necessary and the Ohlone Costanoan Esselen Nation is identified as the MLD, the Ohlone Costanoan Esselen Nation should be given the opportunity to remove the remains. Tribal artifacts should be "repatriated" (returned to the tribe).

Guidelines for Historic Assessments

The City's Guidelines for Historic Assessments, last updated in 2017, are intended to guide the evaluation of potentially historic resources and any proposed changes to both potential and identified historic resources. In addition to complying with these guidelines, any proposed changes to historic resources should generally comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Guidelines for Historic Assessments outline requirements for initial historic screenings, phase one and phase two historic assessments, and conditions under which projects are exempt from the guidelines. The guidelines are intended to facilitate implementation of the historic preservation regulations established by Pacific Grove Municipal Code Chapter 23.76 and are applied to all proposed development in Pacific Grove that involve a property over 50 years old but is of an undetermined historic status.

4.4.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The assessment of potential impacts to historical and archaeological resources and human remains were informed based on a review of readily available information. To identify known historical resources located within the project area, which is the entire City of Pacific Grove, the background research for this study included a review of the NRHP, CRHR, Built Environment Resources Directory, and available information related to the Pacific Grove HRI, as provided by the City. The review identified approximately 500 properties, including individual properties and historic districts, within the project area which qualify as historical resources that are listed in, or eligible for, the NRHP, CRHR or Pacific Grove HRI. However, due to City database constraints and the presence of parcels that have not yet received an eligibility determination, it was not feasible to provide accurate accounting of which parcels in the housing sites, upzoning areas, and additional parcels contain known historical resources at the programmatic level.

To identify known archaeological resources within the project area, sources from the Northwest Information Center, the California OHP website and the National Parks Service were reviewed. As a programmatic document, this DEIR presents a citywide assessment of the proposed project. Because the Housing Element Update, Zoning Amendments, and General Plan Amendments are long-term documents intended to guide actions for many years into the future and because archaeological resource locations are confidential, this analysis relies on program-level evaluation.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines,* the proposed project would have a significant impact on cultural resources if it would:

1. Cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; and/or
3. Disturb any human remains, including those interred outside of dedicated cemeteries.

The significance of a cultural resource and, subsequently, the significance of any impacts thereto are determined by consideration of whether that resource can increase our knowledge of the past. The determining factors are site content and degree of preservation. A finding of archaeological significance follows the criteria established in *CEQA Guidelines* Section 15064.5 (Determining the Significance of Impacts to Archaeological Resources):

- (3) […] Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (PRC Section 5024.1, Title 14 California Code of Regulations Section 4852).
- (4) The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1[k]), or identified in an historical resources survey (meeting the criteria in PRC Section 5024.1[g]) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) and 5024.1.
- (b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Historical resources are "significantly" affected if there is demolition, destruction, relocation, or alteration of the resource or its surroundings. Generally, impacts to historical resources can be mitigated to below a level of significance by following the Secretary of the Interior's *Guidelines for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (*CEQA Guidelines* Section 15064.6[b]). In some circumstances, documentation of a historical resource by way of historic narrative photographs or architectural drawings will not mitigate the impact of demolition below the level of significance (*CEQA Guidelines* Section 15126.4[b][2]). Preservation in place is the preferred form of mitigation for archaeological resources as it retains the relationship between artifact and context, and may avoid conflicts with groups associated with the site (*CEQA Guidelines* Section 15126.4[b][3][A]). If an archaeological resource does not meet either the historical resource or the more specific "unique archaeological resource" definition, impacts do not need to be mitigated (*CEQA Guidelines* Section 15064.5[e]). Where the significance of a site is unknown, it is presumed to be significant for the purpose of the DEIR analysis.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CUL-1 DEVELOPMENT FACILITATED BY THE PROJECT HAS THE POTENTIAL TO CAUSE ADVERSE CHANGES TO THE SIGNIFICANCE OF HISTORICAL RESOURCES. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Development facilitated by the project would have a significant impact on historical resources if such activities would cause a substantial adverse change in the significance of a historical resource. A substantial adverse change would result from the demolition or substantial alteration of a resource such that it would no longer be able to convey its significance. Historical resources include properties eligible for listing in the NRHP or CRHR or as a local historic resource or landmark. Pursuant to PRC Section 15064.5, "[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its

immediate surroundings such that the significance of an historical resource would be materially impaired."

A review of construction data and historical aerial photographs was conducted for the housing sites, upzoning areas, and additional parcels. This review confirmed that, throughout the project area, there are many additional properties which have not been subject to previous historical resources evaluation, but which currently meet the 45 year age threshold generally triggering the need for evaluation, or will become 45 years age over the span of the project, for which full buildout is assumed to occur in 2031. There is potential for previously unevaluated properties to qualify as historical resources pursuant to CEQA. For the purposes of this analysis, these properties are considered potential historical resources.

Development facilitated by the project could impact historical resources at these sites through demolition, construction, and reconstruction activities associated with redevelopment. The City has adopted regulations to minimize impacts to historical resources, which would apply to future development facilitated by the project. As described above in Section 4.5.2, *Regulatory Setting*, certain provisions of the City's historic preservation regulations mandate procedures for the local designation of historical resources and districts and a review and permitting process for work affecting a locally-listed resource or within a locally-listed historic district. Generally, the approval of such permits requires a project applicant to demonstrate that the project conforms with the Secretary of the Interior's Standards and applicable local regulations, including the elements of the City's Architectural Review Guidelines and the Guidelines for Historic Assessments. These regulations are intended to reduce impacts by ensuring that alterations do not cause the loss of the character defining features of a locally-designated resource.

In addition to the requirements of the City Municipal Code, General Plan Historic and Archaeological Resources Element policies 1 through 9, and 19 and City Pacific Grove Local Coastal Program policies CRS-7 through CRS-9, CRS-12, and CRS-13 provide measures for the protection and identification of historical resources and maintenance of the general historic character of the city. Furthermore, while City regulations and CEQA do not require public consultation regarding impacts to built environment historical resources, City of Pacific Grove Local Coastal Program Policy CRS-13 states that, "the City will maintain and update the Historic Resources Inventory, with assistance from professional consultants and the Heritage Society of Pacific Grove, to provide a current description of the historic and visual character of … historical neighborhoods in the Coastal Zone."

The development of housing units within historic structures is discussed in Chapter 2, Housing Resources, of the proposed Housing Element Update. As discussed therein, several proposed housing sites include sites listed in the City's Historic Resources Inventory. However, these sites are intended to facilitate internal office space conversions, whereby existing vacant office uses on the upper floors of commercial buildings would be converted to residential units. In this scenario, it is the intent for the existing onsite historic resource to be preserved, not demolished or relocated.

Office conversions could include minor revisions to the exterior of historic resources. Potential impacts to historical resources would be reduced to the extent feasible with implementation of the City's - Historic Preservation Ordinance (Pacific Grove Municipal Code Chapter 23.76), Guidelines for Historic Assessments, and Community Development Permit Review procedures (Pacific Grove Municipal Code Chapter 23.70). Additionally, any proposed changes to known historic resources must comply with the Secretary of Interior's Standards for the Treatment of Historic Properties (Standards and Guidelines for Rehabilitation).

The City's Guidelines for Historic Assessments are applied to all proposed development in Pacific Grove that involves a property over 50 years old and not eligible for exemption from historic assessment. Such properties may undergo an Initial Historic Screening held by the Historic Resources Committee where the Committee decides if the property is potentially eligible for the City's Historic Resources Inventory. If the committee determines that a property may be eligible for the City's Historic Resources Inventory, the applicant is required to prepare a Phase One Historic Assessment by a qualified historic consultant.

The Phase One Historic Assessment must determine if a resource is historic by using criteria from the NRHP, the CRHR, and Pacific Grove's Historic Preservation Ordinance (Pacific Grove Municipal Code Chapter 23.76). The use of federal, state, and local criteria is consistent with CEQA and PRC Section 21084.1, which define a historical resource as a resource listed in, or determined eligible for listing in, the NRHP, the CRHR, or a resource included in a local register of historical resources. The City's Guidelines for Historic Assessments require preparation of a Phase Two Assessment if the Phase One Assessment determines that the subject property is eligible for listing in one or more of the above sources. The Phase Two Assessment must provide a detailed evaluation of the resource, how a proposed project would affect its significance, and potential mitigation measures that could reduce impacts to the resource's significance for the City to consider. According to the Guidelines for Historic Assessments, mitigation may include, but is not limited to: use the Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Structures; the State Historic Building Code; project alternatives; documentation using the Historic American Building Survey (HABS) or alternative standards; an educational exhibit for public use; salvage of building elements; and/or relocation of the resource. If impacts to the resource's significance are unavoidable, the Phase Two Assessment must provide a statement that the proposed project would cause a significant impact to the resource which cannot be mitigated.

The City regulations and guidelines described above would reduce potential impacts to known historical resources designated by the City, requiring adherence to the Secretary of the Interior's Standards and other requirements intended to preserve the character of individual historical resources and historic districts. However, while local regulations require alternatives to the demolition of a locally-designated resource, they do not prohibit such demolitions or require measures to minimize the impacts caused by such demolitions that may occur for health and safety concerns. Therefore, because development facilitated by the project has the potential to damage, alter, or destroy known or unknown historical resources, and because the City's existing policies represent the full extent of feasible mitigation, this impact would be potentially significant.

Mitigation Measures

The City's adopted policies and guidelines, including the Guidelines for Historic Assessments**,** establish a process for identifying, evaluating, and mitigating impacts to historical resources. This includes requiring a professional assessment and, where applicable, implementation of feasible mitigation measures such as design modifications, documentation, or relocation. While development facilitated by the project may still have the potential to damage, alter, or destroy known or unknown historical resources, no additional mitigation beyond what is already required by City policy is available or feasible. Therefore, no further mitigation measures are identified.

Significance After Mitigation

Implementation of the City's Guidelines for Historic Assessments, in addition to compliance with Pacific Grove Municipal Code and the City's General Plan, would reduce impacts to historical

resources by identifying and evaluating historical resources and managing relocation, rehabilitation, or alteration in compliance with the Secretary of the Interior's Standards, as applicable. Nonetheless, even with adherence to the City's existing guidelines, goals, and policies, known and eligible historical resources could still be materially impaired by future development facilitated by the project. While most development facilitated by the project would likely not involve impacts to historic resources via compliance with state and local regulations and guidelines, it is possible that future development could materially impair a historic resource. In cases where compliance with the Secretary of the Interior's Standards or avoidance is not possible, significant impacts would occur, and any mitigation measures that could be recommended by a Phase Two Assessment would not be able to mitigate impacts to a less than significant level. Because development facilitated by the project has the very limited potential to damage, alter, or destroy known or unknown historical resources and the loss of historical resources cannot be readily compensated for by commemorative mitigation alone, it is conservatively concluded that project impacts to historical resources would be significant and unavoidable.

Threshold 2:	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CUL-2 GROUND-DISTURBING ACTIVITIES ASSOCIATED WITH DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN DISTURBANCE OR DAMAGE TO ARCHAEOLOGICAL RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

There are 56 known archaeological resources within the project area. Effects on archaeological resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the existing conditions at an individual development site and the characteristics of the proposed ground-disturbing activities. Ground-disturbing activities associated with development facilitated by the project have the potential to damage or destroy recorded and previously unknown archaeological resources that may be present on or below the ground surface. Potential impacts to archaeological resources are most likely to occur in areas that have not been previously developed with urban uses, such as Sites 47 and 53, have not been studied through a cultural resource investigation, or when excavation extends to depths lower than previous disturbance. Many of the housing sites have been previously developed and graded, but new development may extend deeper than previous disturbance. Additionally, previously disturbed archaeological resources may still be considered significant for reasons related to heritage value. Consequently, damage to or destruction of previously unknown subsurface cultural resources could occur as a result of development facilitated by the project.

Therefore, there is potential for unknown historic-aged and prehistoric archaeological resources to exist throughout the project area which could be damaged or destroyed during ground-disturbing activities. The project would have a potentially significant impact on archaeological resources.

Mitigation Measures

CUL-2(a) Archaeological Resources Assessment and Protection

For specific development projects involving ground disturbance on identified housing sites, in upzoning areas, or on additional parcels, the project proponent shall retain a City-approved consultant to conduct a preliminary review to determine the need for a formal archaeological assessment. The preliminary review shall include a review of available information regarding previous disturbance, the presence of fill, and previous cultural resources studies on file with the

City. If it can be determined that all proposed ground disturbance will occur in documented non-native fill or that the project site has been previously disturbed and subject to cultural resources review with negative findings, no further review will be required. If preliminary review suggests the project may impact native soils that have not been previously subject to cultural resources study, the project proponent shall retain a City-approved archaeologist to prepare an archaeological resources assessment. The archaeological assessment shall be conducted by a qualified archaeologist who meets the Secretary of the Interior's PQS in prehistoric or historic archaeology (NPS 2025). Archaeological assessments shall include a records search at the Northwest Information Center, pedestrian survey of the individual development site, and preparation of a technical report to be submitted to the City for review and approval. The archaeological assessment shall include recommendations for additional study or mitigation, if necessary, which may include, but would not be limited to: subsurface testing, designing and implementing a worker environmental awareness program, construction monitoring by a qualified archaeologist, avoidance of sites, or preservation in place. Recommended mitigation measures shall be consistent with *CEQA Guidelines* Section 15126.4(b)(3).

CUL-2(b) Inadvertent Discovery of Archaeological Resources

If evidence of any prehistoric or historic-era subsurface archaeological features or deposits are discovered during construction-related earthmoving activities (e.g., ceramics, trash scatters, lithic scatters), all ground-disturbing activity within a minimum of 50 feet shall be halted until a qualified archaeologist can assess the significance of the find. The work exclusion area may be reduced or expanded as directed by the qualified archaeologist. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the archaeologist determines that further information is needed to evaluate significance, a testing plan shall be prepared and implemented. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the City to avoid disturbance to the resources. If complete avoidance is not feasible in light of project design, economics, logistics, and/or other factors, the archaeologist shall recommend additional measures such as the preparation and implementation of a data recovery plan. All cultural resources work shall follow accepted professional standards in recording any find including submittal of standard Department of Parks and Recreation Primary Record forms and location information to the Northwest Information Center. If the find is a prehistoric archaeological site, the culturally affiliated California Native American tribe shall be notified and afforded the opportunity to monitor mitigative treatment. During evaluation or mitigative treatment, ground disturbance and construction work may continue in other parts of the project area that are distant enough from the find not to impact it, as determined appropriate by the qualified archaeologist.

Significance After Mitigation

Implementation of Mitigation Measure CUL-2(a) would reduce impacts to less than significant by requiring a review of specific development projects involving ground disturbance on identified housing sites, in upzoning areas, or on additional parcels to assess the potential to encounter and impact archaeological resources. If archaeological resources are present, Mitigation Measure CUL-2(b) outlines procedures to evaluate and treat significant resources.

Threshold 3:	Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 GROUND-DISTURBING ACTIVITIES ASSOCIATED WITH DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN DISTURBANCE OF HUMAN REMAINS. COMPLIANCE WITH STATE HEALTH AND SAFETY CODE SECTION 7050.5 AND PUBLIC RESOURCES CODE SECTION 5097.8 WOULD ENSURE THE IMPACTS TO HUMAN REMAINS WOULD BE LESS THAN SIGNIFICANT.

One formal cemetery, El Carmelo Cemetery, is identified with the project area but outside identified housing sites, in upzoning areas, or on additional parcels. Additionally, human burials outside of formal cemeteries can occur in archaeological contexts. Excavations and/or ground-disturbing activities during construction of development facilitated by the project could have the potential to disturb previously unknown human remains in the project area.

Pursuant to California Health and Safety Code Section 7050.5, if human remains are found, the County Coroner must be notified immediately, and no further disturbance can occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If the human remains are determined to be of Native American origin, the County Coroner would notify the NAHC, which would then determine and notify an MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner must reinter the remains in a location that would not be affected by future ground-disturbing activities. Development facilitated by the project would comply with the provisions set forth pursuant to California Health and Safety Code Section 7050.5 and PRC Section 5097.98. Therefore, although it is possible ground-disturbing activities related to project construction could disturb human remains beneath the project area, adherence to California Health and Safety Code Section 7050.5 would ensure impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.4.4 Cumulative Impacts

The geographic scope for cumulative cultural resource impacts is based on the historic, ethnographic, and prehistoric period use patterns of the project area and surrounding region. The geographic extent of cumulative impacts for the historic period is the City of Pacific Grove. The geographic scope for the pre-colonial period is Monterey County and the areas traditionally occupied by the people indigenous to the region. This geographic scope is appropriate because cultural resources are regionally specific and cultural resources in this larger region will be similar in type and style to those that are or may be present in the project area. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact cultural resources.

Buildout of cumulative projects could result in significant cumulative impacts to known and/or unknown historical resources. While impacts to such resources would be addressed on a case-by-case basis, and would likely be subject to mitigation measures similar to those imposed for development facilitated by the project, cumulative development may result in the destruction of historical resources. As such, cumulative impacts to historical resources (Threshold 1) would be significant. Development facilitated by the project would implement Mitigation Measure CUL-1 to

ensure impacts to unknown historical resources are adequately mitigated. However, even after implementation of Mitigation Measure CUL-1, the project would result in a considerable contribution to this cumulative impact if it were to result in building demolitions and new development that cause the direct loss of historical resources, including historic district contributing properties, or in physical changes in the setting of a historical resource, such that existing individual historic resources and historic districts would no longer be eligible for listing at the national, state, or local level.

Buildout of cumulative projects could result in significant cumulative impacts to known and/or unknown archaeological resources. In the event that individual cumulative projects would result in impacts to known or unknown archaeological resources, impacts to such resources would be addressed on a case-by-case basis, and would likely be subject to mitigation measures similar to those imposed for development facilitated by the project. As such, cumulative archaeological impacts (Threshold 2) would be potentially significant. Development facilitated by the project would implement Mitigation Measure CUL-2 and -3 to ensure impacts to archaeological resources are adequately mitigated. After implementation of Mitigation Measure CUL-2 and -3, the project would not result in a considerable contribution to this cumulative impact because potentially significant archaeological resources would be identified, documented, and treated.

Cumulative projects in the region involving ground-disturbing activities could encounter human remains. If human remains are found, cumulative projects would be required to comply the State of California Health and Safety Code Section 7050.5, as described in Impact CUL-3, above. With adherence to existing regulations relating to human remains, cumulative impacts would be less than significant (Threshold 3).

4.5 Energy

The analysis in this section describes current regional energy use in and around Pacific Grove and evaluates the potential energy impacts of buildout under the proposed project, including potentially wasteful, inefficient, or unnecessary consumption of energy resources or conflicts with plans for renewable energy or energy efficiency. Potential impacts related to air quality are discussed in Section 4.2, *Air Quality,* and potential impacts related to greenhouse gas emissions are discussed in Section 4.7, *Greenhouse Gas Emissions.*

4.5.1 Setting

Energy use relates directly to environmental quality, since it can adversely affect air quality and can generate greenhouse gas (GHG) emissions that contribute to climate change. Fossil fuels are burned to create electricity that powers residences and commercial/industrial buildings, heats and cools buildings, and powers vehicles. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes such as auto, carpool, and public transit; and miles traveled by these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy.

a. Energy Supply

Petroleum

California is one of the top producers of petroleum in the nation with drilling operations occurring throughout the State but concentrated primarily in Kern and Los Angeles counties. A network of crude oil pipelines connects production areas to oil refineries in the Los Angeles area, the San Francisco Bay area, and the Central Valley. California oil refineries also process Alaskan and foreign crude oil received at ports in Los Angeles, Long Beach, and the San Francisco Bay area (California Energy Commission [CEC] 2023a). According to the United States Energy Information Administration (USEIA), California's field production of crude oil totaled 124.7 million barrels in 2022 (USEIA 2024).

No petroleum refineries are located within Pacific Grove. According to the California Geologic Energy Management Division (CalGEM), there are no wells within Pacific Grove, and the nearest plugged dry hole well is approximately 4.3 miles southeast of the project area (CalGEM 2024).

Alternative Fuels

A variety of alternative fuels are used to reduce petroleum-based fuel demand. Their use is encouraged through various Statewide regulations and plans, such as the Low Carbon Fuel Standard and Senate Bill (SB) 32. Alternative vehicle fuels include hydrogen, biodiesel, and electricity. Currently, 56 hydrogen and 33 biodiesel refueling stations are located in California, but none are located in Pacific Grove. There are 14 electric vehicle charging centers located in Pacific Grove and one renewable diesel station two blocks outside of the project area at the intersection of Lighthouse Avenue and Prescott Avenue in the City of Monterey (United States Department of Energy 2025).

Electricity

In 2022, California's in-state electricity generation totaled 215,625 megawatts. Primary fuel sources for the state's electricity generation in 2022 included natural gas, hydroelectric, solar photovoltaic, wind, nuclear, geothermal, biomass, and solar thermal. According to the CEC, California's electricity sector is becoming increasingly reliant on solar, with more than 39,422 gigawatt-hours (GWh) of electricity produced by photovoltaic systems in 2023 (CEC 2024a).

The Pacific Gas and Electric Company (PG&E) provides transmission lines to convey electric power supply to Pacific Grove. PG&E is one of the nation's largest electric and gas utility companies, maintaining 108,000 circuit miles of electric distribution lines and 18,000 circuit miles of electric transmission lines (PG&E 2024). In 2022, PG&E's power mix consisted of 49 percent nuclear generation, 38 percent renewables, 8 percent large hydroelectric facilities, and 5 percent natural gas (PG&E 2024). According to PG&E's 2022 Integrated Resource Plan, PG&E anticipates meeting a 2030 energy load demand of 28,020 GWh (PG&E 2022).

Central Coast Community Energy (3CE) is a Community Choice Aggregator established by local communities to source clean and renewable electricity for Santa Barbara, San Luis Obispo, Monterey, San Benito, and Santa Cruz counties while retaining the primary utility provider's (PG&E) traditional role delivering power, maintaining electric infrastructure, and billing for electricity. In 2022, 3CE's power mix consisted of 35.8 percent renewable resources, 5.9 percent large hydroelectric facilities, and 58.3 percent unspecified power (3CE 2023).

Natural Gas

According to the California Geologic Energy Management Division (CalGEM), California's net natural gas production for 2020 was 136.6 billion cubic feet (CalGEM 2023). The State of California relies on out-of-state imports for nearly 90 percent of its natural gas supply. CEC estimates approximately 45 percent of the natural gas burned in California was used for electricity generation, and the remainder is consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors (CEC 2023b). Pacific Grove's natural gas services are provided by PG&E, which owns and operates an integrated natural gas transmission, underground storage, and distribution system across most of Northern and Central California. PG&E serves approximately 4.52 million commercial and industrial customers in 37 counties, from southeast of Bakersfield to north of Redding, with high concentrations in the San Francisco Bay Area and the Sacramento and San Joaquin valleys. PG&E's average-year demand is forecasted to decline at an annual average rate of 3.0 percent between 2024 and 2040, driven by the state's decarbonization policies and reductions in core and electric generation demand (California Gas and Electric Utilities 2024).

b. Energy Demand

Petroleum

California

According to USEIA, transportation accounted for nearly 40 percent of California's total energy demand, amounting to approximately 1,591 trillion British thermal units (Btu) in 2022 (USEIA 2024). CEC produces the California Annual Retail Fuel Outlet Report, which is a compilation of gasoline and diesel fuel sales data from across the state available at the county level. According to the CEC, California's 2023 fuel sales totaled 13.6 billion gallons of gasoline and 2,316 million gallons of diesel (CEC 2024b).

Monterey County

The smallest scale at which gasoline and diesel fuel sales information is readily available is the county level. Therefore, fuel sales in Monterey County are used herein to characterize the city's existing gasoline and diesel fuel consumption. As shown in Table 4.5-1, Monterey County consumed an estimated 157 million gallons of gasoline and 25 million gallons of diesel fuel in 2023 (CEC 2024b). As Monterey County had a 2023 population of 430,368, the county's annual per capita fuel consumption in 2023 is estimated at 365 gallons of gasoline and 58 gallons of diesel fuel.

Table 4.5-1 2023 Annual Gasoline and Diesel Consumption

Fuel Type	Monterey County (million gallons)	California (million gallons)	Proportion of Statewide Consumption	County per Capita Consumption (gallons)[1]
Gasoline	157	13,576	1.2%	364.8
Diesel	25	2,316	1.0%	58.1
Total	**182**	**15,892**	**1.1%**	**422.9**

Notes: Diesel and gasoline volumes are expressed in gallons while Btu volumes are expressed in millions of Btu (MMBtu).

[1] Based on a Monterey County population of 430,368 (DOF 2024).

Source: CEC 2024b

Electricity

California

According to the CEC, California consumed approximately 287,826 gigawatt hours (GWh) in 2022, or approximately 9,821 billion Btu (CEC 2025a). According to the CEC's Energy Consumption Database, residential electricity demand accounted for approximately 21.8 percent of California's electricity consumption in 2021 while non-residential demand accounted for approximately 78.2 percent (CEC 2025a).

Monterey County

The smallest scale at which electricity consumption information is readily available is the county level. Therefore, electricity consumption in Monterey County is used to characterize the city's existing electricity consumption. According to the CEC, Monterey County consumed approximately 2,491 GWh in 2022 (latest available data), or approximately 8,500 billion Btu (CEC 2025a). Table 4.5-2 illustrates the county's 2022 electricity consumption in comparison to statewide consumption and displays the county's equivalent per capita energy consumption from its electricity demand. With a population of 430,368 in 2022, Monterey County's 2022 per capita electricity consumption was approximately 5,788 kWh, or 19.8 million Btu.

Table 4.5-2 2022 Annual Electricity Consumption

Energy Type	Monterey County (GWh)	California (GWh)	Proportion of Statewide Consumption	County per Capita Consumption (kWh)[1]	County per Capita Consumption (MMBtu)
Electricity (GWh)	2,491	287,826	0.87%	5,788	19.8

Notes: Electricity consumption volumes for Monterey County and California are expressed in megawatt-hours (MWh) while County per capita consumption is expressed in kilowatt-hours (kWh) and millions of Btu (MMBtu).

[1] Based on a Monterey County population of 430,368 and a California population of 38,940,231 as of January 2023 (DOF 2023).

Source: CEC 2025a

Natural Gas

California

In 2022, California consumed a total of 11,710 million therms of natural gas (CEC 2025b). According to the CEC's Energy Consumption Database, residential natural gas demand accounted for approximately 38.8 percent of California's total natural gas demand while non-residential natural gas demand accounted for approximately 61.2 percent (CEC 2025b).

Monterey County

The smallest scale at which natural gas consumption information is available is the county level; therefore, natural gas consumption in Monterey County is used herein to characterize the city's existing natural gas consumption. According to the CEC, Monterey County consumed approximately 112 million U.S. Therms of natural gas in 2022 (latest available data), or approximately 11,200 billion Btu (CEC 2025c). Table 4.5-3 illustrates the county's 2022 natural gas consumption in comparison to statewide consumption and displays the county's equivalent per capita energy consumption from its natural gas demand. With a population of 430,368 in 2022, Monterey County's 2022 per capita natural gas consumption was approximately 260 therms, or approximately 26.0 million Btu.

Table 4.5-3 2022 Annual Natural Gas Consumption

Energy Type	Monterey County (U.S. therms)	California (U.S. therms)	Proportion of Statewide Consumption	County per Capita Consumption (U.S. therms)	County per Capita Consumption (MMBtu)
Natural Gas	111,550,639	11,710,641,190	0.95%	260	26.0

Notes: Natural gas consumption volumes for Monterey County and California are expressed in U.S Therms while County per capita consumption is expressed in therms and millions of Btu (MMBtu).

Source: CEC 2025b, 2025c

Alternative Fuels

A variety of alternative fuels are used to reduce petroleum-based fuel demand. The use of these fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard and Health and Safety Code Section 38566 [Senate Bill (SB) 32]). Conventional gasoline and diesel may be replaced, depending on the capability of the vehicle, with many alternative fuels including the following:

- *Hydrogen* is being explored for use in combustion engines and fuel cell electric vehicles. The interest in hydrogen as an alternative transportation fuel stems from its clean-burning qualities, its potential for domestic production, and the fuel cell vehicle's potential for high efficiency (two to three times more efficient than gasoline vehicles). Currently, 44 open hydrogen refueling stations are in California, although none are in or near Pacific Grove (California Fuel Cell Partnership 2025).
- *Biodiesel* is a renewable alternative fuel that can be manufactured from vegetable oils, animal fats, or recycled restaurant greases. Biodiesel is biodegradable and cleaner-burning than petroleum-based diesel fuel. Biodiesel can run in any diesel engine generally without alterations. There are 41 biodiesel refueling stations in California, although none are in or near Pacific Grove (United States Department of Energy 2025).

- *Electricity* can be used to power electric and plug-in hybrid electric vehicles directly from the power grid. The electricity grid usually provides electricity used to power vehicles, which store it in the vehicle's batteries. Fuel cells are being explored to use electricity generated on board the vehicle to power electric motors. Pacific Grove currently has approximately 14 electrical charging stations spread around the city (United States Department of Energy 2025).

Energy and Fuel Efficiency

Though the demand for gasoline and diesel fuel is rising because of population growth and limited mass transit, the increase in demand can be offset partially by efficiency improvements. Land use policies that encourage infill and growth near transit centers (e.g., following SB 375, the Sustainable Communities and Climate Protection Act of 2008), improvements to fuel efficiency, and gradual replacement of the vehicle fleet with new, more fuel-efficient and alternative-fuel as well as electric cars will all reduce fuel use.

4.5.2 Regulatory Setting

a. Federal Regulations

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 was designed to improve vehicle fuel economy and help reduce nationwide dependence on foreign oil. It expands the production of renewable fuels, reducing dependence on oil, and confronting global climate change. Specifically, the Act sets energy efficiency standards for lighting (specifically light bulbs) and appliances.

Federal Fuel Efficiency Standards

Under the Clean Air Act, corporate average fuel economy (CAFE) standards have been set for passenger cars and light trucks. The State of California has traditionally had a waiver to set its own more stringent fuel efficiency standards. However, on August 2, 2018, the National Highway Traffic Safety Administration and United States Environmental Protection Agency (USEPA) proposed the Safer Affordable Fuel-Efficient Vehicles Rule. This rule addresses emissions and fuel economy standards for motor vehicles and is separated into two parts as described below.

- Part One, “One National Program” (84 FR 51310) revoked a waiver granted by USEPA to the State of California under Section 209 of the CAA to enforce more stringent emission standards for motor vehicles than those required by USEPA for the explicit purpose of GHG reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, potentially restricting the ability of the California Air Resources Board (CARB) to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California. The waiver was reissued in March 2022, and revoked again in May 2025.
- Part Two addresses CAFE standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and amended existing CAFE standards for model year 2021. The proposal retains the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026. The proposal addressing CAFE standards was jointly developed by National Highway Traffic Safety Administration and USEPA, with USEPA simultaneously proposing tailpipe carbon dioxide standards for the same vehicles covered by the same model years.

Energy Policy and Conservation Act

Enacted in 1975, the Energy Policy and Conservation Act established fuel economy standards for new light-duty vehicles sold in the United States. The law placed responsibility on the National Highway Traffic and Safety Administration for establishing and regularly updating vehicle standards. The USEPA is responsible for administering the CAFE program, which determines vehicle manufacturers' compliance with existing fuel economy standards. In 2012, USEPA and the National Highway Traffic and Safety Administration established final passenger car and light-duty truck CAFE standards for model years 2017 to 2021, which require a combined average fleet-wide fuel economy of 40.3 to 41.0 miles per gallon in model year 2021.

Energy Star Program

Energy Star is a voluntary labeling program introduced by USEPA to identify and promote energy-efficient products to reduce GHG emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes.

Construction Equipment Fuel Efficiency Standard

USEPA sets emission standards for construction equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

Title 13 of the California Code of Regulations, Sections 2449 and 2485

Sections 2449 and 2485 are separate but related regulations in the California Code of Regulations that aim to reduce emissions associated with off-road diesel vehicles. Section 2449 contains the In-Use Off-Road Diesel-Fueled Fleets Regulations, which are intended to reduce emissions of nitrogen oxides and diesel particulate matter. Section 2485 is an Airborne Toxic Control Measure that limits idling of certain diesel-fueled vehicles for more than five minutes.

b. State Regulations

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the CEC. The Act established a state policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The CPUC regulates privately owned utilities in the energy, rail, telecommunications, and water fields.

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000; codified as Public Resources Code Sections 25720-25721), the CEC and CARB prepared and adopted in 2003 a joint agency report, Reducing California's Petroleum Dependence. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and

30 percent by 2030; significantly increase the efficiency of motor vehicles; and reduce per capita vehicle miles traveled (VMT). One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand. Furthermore, in response to the CEC's 2003 and 2005 Integrated Energy Policy reports, the Governor directed the CEC to take the lead in developing a long-term plan to increase alternative fuel use.

Integrated Energy Policy Report

SB 1389 (Chapter 568, Statutes of 2002) requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and price to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety.

California Renewables Portfolio Standard Program

In 2018, the California Renewables Portfolio Standard (SB 100) was signed into law, which increased the renewable portfolio standard to 60 percent by 2030 (i.e., that 60 percent of electricity retail sales must be served by renewable sources by 2030) and requires all the state's electricity to come from carbon-free resources by 2045.

California Energy Action Plan

The CEC, in collaboration with California Public Utilities Commission (CPUC), is responsible for preparing the California Energy Action Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy. The 2003 Energy Action Plan calls for the State to assist in transformation of the transportation system to improve air quality, reduce congestion, and increase efficient use of fuel supplies with the least environmental and energy costs. The Energy Action Plan identifies strategies, such as assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs and encourages urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access. In the 2005 Energy Action Plan, the CEC and CPUC updated the energy policy vision by adding dimensions to the policy areas, such as information on the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the 2005 Energy Action Plan in 2008 that supplements the earlier Energy Action Plans and examines the State's ongoing actions in the context of global climate change.

Assembly Bill 1493

AB 1493 (Chapter 200, Statutes of 2002), known as the Pavley Bill, amended Health and Safety Code Sections 42823 and added 43018.5, requiring CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

Assembly Bill 1007

AB 1007 required the CEC, in partnership with CARB, to prepare a State Alternative Fuels Plan. The final State Alternative Fuels Plan was adopted in December 2007. The plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality.

Senate Bills 350, 100, and 1020

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources to be increased to 50 percent by December 31, 2030. This act also requires the doubling of energy efficiency in existing buildings by 2030.

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, last updated by SB 350. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045.

In 2022, Governor Newsom signed SB 1020, which adds interim targets to the policy framework originally established in SB 100 to require renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent of all retail electricity sales by 2040. SB 1020 also requires all state agencies to rely on 100 percent renewable energy and zero-carbon resources to serve their own facilities by 2035. SB 1020 took effect January 1, 2023.

Executive Order S-06-06

Executive Order S-06-06, or the Bioenergy Action Plan, was issued in April 2006 and outlined a set of target goals, which would establish the increasing use and production of biofuels and biopower for both electricity generation and as a substitute for natural gas. The plan aims to promote the sustainable production and use of biofuels and biopower, which would contribute to environmental protection, economic growth, and energy independence.

California Code of Regulations Title 24 (California Building Code)

Updated every three years through a rigorous stakeholder process, Title 24 of the California Code of Regulations requires California homes and businesses to meet strong energy efficiency and sustainability measures, thereby lowering their energy consumption. Title 24 contains numerous subparts, including Part 1 (Administrative Code), Part 2 (Building Code), Part 3 (Electrical Code), Part 4 (Mechanical Code), Part 5 (Plumbing Code), Part 6 (Energy Code), Part 8 (Historical Building Code), Part 9 (Fire Code), Part 10 (Existing Building Code), Part 11 (Green Building Standards Code), Part 12 (Referenced Standards Code). The California Building Code is applicable to all development in California (Health and Safety Code Sections 17950 and 18938[b]). The CEC adopted the 2025 Building Energy Efficiency Standards (Energy Code) in September 2024 for newly constructed, renovated buildings, and certain other existing buildings, which will go into effect on January 1, 2026.

The regulations receive input from members of industry, as well as the public, with the goal of "[r]educing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (Public Resources Code Section 25402). These regulations are scrutinized and analyzed for technological and economic feasibility (Public Resources Code Section 25402[d]) and cost effectiveness (Public Resources Code Sections 25402[b][2] and [b][3]).

Part 6 – Building Energy Efficiency Standards (Energy Code)

California Code of Regulations Title 24 Part 6 is the Building Energy Efficiency Standards. This code, originally enacted in 1978, establishes energy efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. The Building Energy Efficiency

Standards are updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC.

The Energy Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. The Energy Code also provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including: appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls and ceilings. The Energy Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. In addition, the California Green Building Standards Code sets targets for: energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

In 2018, the California Building Standards Commission adopted additional modifications to Title 24, which require solar photovoltaic panels to be installed on new low-rise residential buildings starting January 1, 2020. Low-rise residential buildings include single-family homes and multi-family buildings of three stories or less; therefore, apartments and condos are included in the new standards. Additionally, the California Energy Code requires all new single-family homes to be "electric-ready," or built to use all electric appliances.

The 2022 update to the Building Energy Efficiency Standards under Title 24 applies to buildings for which an application for a building permit is submitted on or after January 1, 2023. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided these standards exceed those provided in Title 24. The updated standards mainly established electric-ready requirements when natural gas is installed, expanded solar photovoltaic and battery storage standards, and strengthened ventilation standards to improve indoor air quality. The adopted 2025 Energy Code, which will go into effect January 1, 2026, encourages the use of efficient electric heat pump technology for space and water heating in newly constructed single-family, multifamily, and select nonresidential building types.

Part 11 – California Green Building Standards

The California Green Building Standards Code, commonly referred to as "CALGreen," originally went into effect on August 1, 2009 and outlines architectural design and engineering principles that are in synergy with environmental resources and public welfare. CALGreen sets minimum standards for buildings, and since 2016, applies to new building construction and some alterations/additions within certain parameters. CALGreen establishes planning and design standards for sustainable site development, including water conservation measures and requirements that new buildings reduce water consumption by 20 percent below a specified baseline. CALGreen requires installations of 1.28 gallons-per-flush toilets and 0.5-gallon-per flush urinals for all non-residential projects as part of the prescriptive method of reducing indoor water use by the required 20 percent.

CALGreen lays out the minimum requirements for newly constructed residential and non-residential buildings to reduce GHG emissions through improved efficiency and process improvements. It also includes voluntary tiers to encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design. In addition, CALGreen includes several requirements related to solid waste diversion. Importantly, new non-residential construction is required to achieve at least 65 percent construction and demolition waste diversion and provide recycling areas for paper, cardboard, glass, plastics, metal, and organic waste. The 2022 CALGreen update primarily includes new requirements for the inclusion of electric vehicle charging stations and carbon dioxide monitoring and controls in classrooms. These requirements went into effect January 1, 2023.

CARB In-Use On-Road and Off-Road Diesel Rules

The CARB In-Use On-Road and Off-Road Diesel Rules impose limits on idling, restrict the addition of older vehicles, and require the retirement or replacement of older engines depending on their fleet size category. This policy indirectly impacts energy consumption. More specifically, CARB is also charged with developing air pollution control regulations based upon the best available control measures and implementing every feasible control measure under the State and Federal Clean Air Act (Health and Safety Code Sections 39602.5, 39667, 43013[a, h], 43018, 40600, 40601, 40612[a][2] and [c][1][A]). Pursuant to these directives, stringent emission standards were adopted in 2004 for off-road construction equipment (i.e., “Tier 4” standards) (40 Code of Federal Regulations Parts 1039, 1065, and 1068; Title 13 California Code of Regulations Section 2025). CARB also adopted emission standards for on-road heavy duty diesel vehicles (i.e., haul trucks) (13 California Code of Regulations Section 1956.8). These haul truck regulations mandated fleet turnover to ensure that nearly all on-road diesel trucks had 2010 model year engines or equivalent (i.e., Tier 4) by January 1, 2023.

Executive Order N-79-20

Executive Order N-79-20 sets goals for the use of zero-emission vehicles in the State. Specifically, Executive Order N-79-20 sets a goal for California to ensure by 2035 100 percent of in-State sales of new passenger cars and trucks are zero-emission vehicles. Executive Order N-79-20 also sets a goal to ensure by 2045 100 percent of medium- and heavy-duty vehicles in the State are zero-emission vehicles. Executive Order N-79-20 also sets a goal to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.

c. Regional and Local Regulations

Association of Monterey Bay Area Governments

The Association of Monterey Bay Area Governments (AMBAG), as the metropolitan planning organization for the Monterey Bay area, is required to produce certain documents that maintain the region's eligibility for federal transportation assistance, including the Metropolitan Transportation Plan (MTP). AMBAG coordinates the development of the MTP with Regional Transportation Planning Agencies (San Benito County Council of Governments, Santa Cruz County Regional Transportation Commission, and Transportation Agency for Monterey County), transit providers (San Benito County Local Transit Authority, Monterey Salinas Transit, and Santa Cruz METRO Transit District), MBARD, state and federal governments, and organizations having interest in or responsibility for transportation planning and programming. AMBAG also coordinates transportation planning and programming activities with the three counties and 18 local jurisdictions within the tri-county Monterey Bay Region.

In June 2022, AMBAG adopted the 2045 MTP/Sustainable Communities Strategy (SCS). The 2045 MTP/SCS is built on a set of integrated policies, strategies, and investments to maintain and improve the transportation system to meet the diverse needs of the region through 2045. The 2045 MTP/SCS plans more focused growth in high quality transit corridors and more travel choices as well as a safe and efficient transportation system with improved access to jobs and education. The AMBAG region strives toward sustainability through integrated land use and transportation planning. AMBAG was tasked by CARB to achieve a six percent decrease in mobile source GHG emissions compared to 2005 vehicle emissions by the end of 2035. Implementation of the 2045 MTP/SCS is anticipated to achieve a four percent per capita reduction by 2020 and a nearly seven percent per capita reduction by 2035 (AMBAG 2022).

Monterey Peninsula Water Management District

The Monterey Peninsula Water Management District jurisdiction includes Pacific Grove. Monterey Peninsula Water Management District codified Rule 142.1 in its Rules and Regulations in September 2016, which directs water efficiency in plant selection, landscape design, and the irrigation system for new landscapes (including landscapes associated with a building demolition/rebuild) with an aggregate landscape area greater than 500 square-feet that are associated with any grading permit, building permit, or design approval. Water efficiency in construction and design can reduce energy use.

City of Pacific Grove General Plan

The current City of Pacific Grove General Plan addresses energy resources in the Housing Element (adopted 2015-2023 5th Cycle Regional Housing Needs Assessment). The policies to promote energy conservation and efficiency include:

- **Policy 6.1**. Promote energy conservation and weatherization features in existing homes.
- **Policy 6.2**. Encourage energy and resource efficiency in the design of all new residential developments, to the extent practical.

The City of Pacific Grove General Plan also contains goals and policies to reduce resident VMT in the Transportation Element:

- **Policy 7.** Limit the increase in Vehicle Miles Traveled (VMT) in accordance with Air Quality Management Plan goals.
- **Policy 10.** Encourage design for new and expanded development that facilitates access by transit, walking, bicycles, and carpools.

Pacific Grove Municipal Code

The Pacific Grove Municipal Code (PGMC) Chapter 18.04, Building Codes, mandates the implementation of the 2022 California Building Code and the 2022 California Energy Code, which have specific requirements for building design to reduce energy consumption. Some of the measures in the California Energy Code include the use of certain building materials to ensure a greater degree of energy efficiency during building operation and construction and energy efficiency standards for appliances, lighting amenities, and water fixtures, among other project components.

4.5.3 Impact Analysis

a. Significance Thresholds

Based on Appendix G of the *CEQA Guidelines,* the proposed project would have a significant impact related to energy if it would:

1. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and/or
2. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

b. Methodology

Development facilitated by the proposed project is anticipated to be built over approximately eight years. Since construction emissions depend on project-specific details (e.g., the types of construction equipment used, construction schedule, export and import fill volumes), quantifying project buildout construction emissions would be speculative. It is anticipated that several individual projects could be constructed at any given time.

As discussed in Chapter 2, *Project Description,* the project could facilitate development of 2,335 housing units and 292,578 square feet of commercial area. To estimate emissions associated with buildout of the project in any given year of the eight-year Housing Element cycle planning period, the analysis evaluates a conservative sample individual project that hypothetically involves the development of one-quarter of total project buildout, or 584 housing units and 73,145 square feet of commercial area.[1] This individual sample project represents a conservative scenario as it assumes a higher-than-average annual rate of development (i.e., it assumes one-quarter of total potential buildout is built every year and total buildout would be reached in four years, rather than assuming potential buildout is evenly distributed over eight years) and assumes that construction and operation of residential and commercial land uses would overlap in a given year. See Section 4.2, *Air Quality*, for the California Emissions Estimator Model construction activity assumptions.

The California Emissions Estimator Model version 2022.1 was used to approximate the operational natural gas and electricity consumption from development facilitated by the project. This analysis then determined whether energy consumed during operation for full buildout of the project would be wasteful, inefficient, or unnecessary. Operational energy demand accounts for the anticipated energy consumption from development facilitated by the project, such as fuel consumed by cars, trucks, and public transit; natural gas consumed for on-site power generation and heating building spaces; and electricity consumed for building power needs, including, but not limited to, lighting, water conveyance, and air conditioning. The estimate of total daily VMT associated with the project is based on VMT data provided in Section 4.14, *Transportation* and Appendix E.

[1] One quarter of 2,335 housing units is approximately 584 housing units and one-quarter of 292,578 square feet of commercial area is 73,145 square feet of commercial area.

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact E-1 PROJECT CONSTRUCTION AND OPERATION WOULD REQUIRE TEMPORARY AND LONG-TERM CONSUMPTION OF ENERGY RESOURCES. HOWEVER, WITH ADHERENCE TO STATE AND LOCAL REGULATIONS, THE PROJECT WOULD NOT RESULT IN THE WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would involve the use of energy during construction and operation.

Construction

Construction and maintenance of future development envisioned under the project would result in short-term consumption of energy resulting from the use of construction equipment and processes. To provide an estimate of emissions for construction over the years, the analysis conservatively assumes that one individual project involving residential and commercial land uses and one fourth of the amount of new development expected under the proposed project, would be built per year. During construction, the proposed project would consume fuels associated with the onsite use of equipment, off-site hauling of materials and supplies, and worker transportation. As shown in Table 4.5-4, construction activities associated with the hypothetical sample project would result in the consumption of approximately 88,516 gallons of diesel fuel and 53,938 gallons of gasoline.

Table 4.5-4 Sample Project Construction Energy Use

Source	Energy Consumption
Transportation Fuels	
Gasoline	53,938 gal gasoline
Diesel	
On-Road Haul Trucks	19,573 gal diesel
On-Road Vendor Trucks	18,090 gal diesel
Off-Road Construction Equipment	50,853 gal diesel
Diesel Total	**88,516 gal diesel**

Notes: gal = gallons
Source: Appendix H

Energy use during demolition and construction would be temporary in nature, and construction equipment used would be typical of construction projects in the region. In addition, the contractors that would typically be employed for development facilitated by the project would be expected to comply with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction contractors would be required to comply with the provisions of 13 California Code of Regulations Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes, which would minimize unnecessary fuel consumption. Construction equipment would be subject to USEPA

Construction Equipment Fuel Efficiency standards, which would minimize inefficient fuel consumption. These construction equipment standards (i.e., Tier 4 efficiency requirements) are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Electrical power would be consumed during demolition and construction activities, and the demand, to the extent required, would be supplied from existing electrical infrastructure in the region.

With required adherence to state and local regulations, demolition and construction activities associated with future development under the project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Operation

Daily operation of the regional transportation system uses energy in the form of fuel consumed by passenger vehicles, transit vehicles, and shipping vehicles. In addition to transportation energy use, development facilitated by the project would require permanent grid connections for electricity and natural gas. As shown in Table 4.5-5, vehicle trips related to the project would require approximately 809,326 gallons of gasoline (approximately 88,853 MMBtu) and 155,578 gallons of diesel fuel (approximately 19,830 MMBtu) annually. Gasoline and diesel fuel demands would be met by existing gas stations in the vicinity of the housing inventory sites. Vehicles driven by future residents of development facilitated by the project would be subject to increasingly stringent state fuel efficiency standards, thereby minimizing the potential for inefficient consumption of vehicle fuels. Furthermore, the project would facilitate infill, mixed use, and higher intensity development near areas of employment, which would place residents in proximity to public transit and encourage walking and bicycling. As discussed in Section 4.14, *Transportation*, the project buildout would result in 14.1 VMT per capita and 18.6 VMT per employee, which are below the thresholds of 14.3 VMT per capita and 18.9 per employee. This represents an improvement over both existing conditions and the no project buildout scenario, which both exceed the thresholds of 15.5 VMT per capita and 19.8 VMT per employee.

Table 4.5-5 Sample Project Operational Energy Usage

Source	Energy Consumption	Energy Consumption (in MMBtu)
Vehicle Trips		
Gasoline	809,326 gallons	88,853
Diesel	155,578 gallons	19,830
Built Environment		
Electricity	9,351,761 kWh	31,908
Natural Gas Usage	60,137,210 kBtu	60,137

Note: MMBtu = millions of British thermal units; kWh = kilowatt-hours; kBtu = thousands of British thermal units.
Source: Appendix H

As shown in Table 4.5-5, development facilitated by the project would consume approximately 9.3 million kWh, or 31,908 MMBtu per year of electricity, and approximately 60.1 million kBtu, or 60,137 MMBtu per year of natural gas. The increase in population and commercial square footage associated with the project would increase the overall fuel consumption in the project area.

Operation of the development facilitated by the project would consume natural gas and electricity for building heating and power, lighting, and water conveyance, among other operational requirements. Increasingly efficient building fixtures and automobile engines, as well as implementation of state, regional, and local policies, would offset some of the overall energy demand facilitated by buildout under the project. The development projects facilitated by the project would be subject to the energy conservation requirements described in Section 4.5.2, *Regulatory Setting*.

As these standards would apply to new applicable residential development during project buildout, the operational energy demand from residential development facilitated by the project would be supplemented with renewable energy sources to a greater degree. Therefore, for development on sites with existing structures, residential development facilitated by the project would be less dependent on fossil fuels than existing development. Moreover, a greater proportion of electricity supplied for operational power needs for the city in future years would be sourced from renewables, as described in Section 4.5.2, *Regulatory Setting*.

Updates to the Housing Element include goals and policies that would help minimize the occurrence of inefficient, wasteful, and unnecessary energy consumption during construction and operation of development facilitated by the project. Proposed goals and policies that support energy conservation include the following:

Goal 6. Ensure resource efficiency in new and existing housing units

- **Policy 6.1.** Promote energy conservation and weatherization features in existing homes.
- **Policy 6.2.** Encourage energy and resource efficiency in the design of all new residential developments, to the extent practical.

Moreover, development facilitated by the project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, *California's Energy Efficiency Standards for Residential and Nonresidential Buildings)* and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). Compliance with these requirements would result in energy conservation, such as the promotion of alternative transportation, water conservation, and waste reduction, would promote greater energy efficiency in municipal and community operations and development. With state, regional, and local regulations and implementation of project goals and policies listed above, project operation would not result in potentially significant environmental effects from wasteful, inefficient, or unnecessary consumption of energy. Impacts would be less than significant.

Mitigation Measures

Mitigation is not required.

Threshold 2: Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Impact E-2 THE ENERGY EFFICIENCY GOALS, POLICIES, AND STRATEGIES CONTAINED IN THE PACIFIC GROVE GENERAL PLAN AND THE AMBAG 2045 MTP/SCS. CONSTRUCTION AND OPERATION OF FUTURE DEVELOPMENT FACILITATED BY THE PROJECT WOULD COMPLY WITH RELEVANT PROVISIONS OF THE STATE'S CALGREEN AND TITLE 24 OF THE CALIFORNIA ENERGY CODE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.5.2, *Regulatory Setting*, several state plans as well as the City's adopted General Plan include energy conservation and energy efficiency strategies intended to enable the state and the City to achieve GHG reduction and energy conservation goals. A full discussion of the proposed project's consistency with GHG reduction plans is included in Section 4.7, *Greenhouse Gas Emissions*. As shown in Table 4.5-6, the project would be consistent with applicable state renewable energy and energy efficiency plans.

Table 4.5-6 Consistency with State Renewable Energy and Energy Efficiency Plans

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
Assembly Bill 2076: Reducing Dependence on Petroleum. Pursuant to AB 2076, the CEC and CARB prepared and adopted a joint-agency report, *Reducing California's Petroleum Dependence,* in 2003. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT. One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand.	**Consistent.** The project would encourage infill and mixed use development and housing development near employment centers. As a result, it would decrease VMT per capita by 2.4 and VMT per employee by 3.1 compared to existing conditions, and would decrease VMT per capita by 1.4 and VMT per employee by 1.3 compared to the future no project scenario (see Section 4.14, *Transportation,* and Appendix E). All housing units constructed under the project would be subject to the requirements of the most recent iteration of CALGreen and locally adopted amendments, which include provisions for electric vehicle charging infrastructure, reducing dependence on gasoline powered vehicles.
California's Renewable Portfolio Standard. California's [renewable portfolio standard] obligates investor-owned utilities, energy service providers, and community choice aggregators to procure 33 percent total retail sales of electricity from renewable energy sources by 2020, 60 percent by 2030, and 100 percent by 2045.	**Consistent.** Electricity provided for development facilitated by the project would be supplied by PG&E but sourced from 3CE. Customers can opt up to 3Cprime, which ensures 100 percent renewable energy from solar and wind sources (3CE 2025). In addition, new construction would be required to adhere to requirements to conserve energy under CALGreen. Additionally, Policies 6.1 and 6.2 of the proposed Housing Element Update would reduce energy use and costs in existing and new housing.

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
Energy Action Plan. In October 2005, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original Energy Action Plan, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the Energy Action Plan II in February 2008 that supplements the earlier Energy Action Plans and examines the state's ongoing actions in the context of global climate change. The nine major action areas in the Energy Action Plan include energy efficiency, demand response, renewable energy, electricity adequacy/reliability/infrastructure, electricity market structure, natural gas supply/demand/infrastructure, transportation fuels supply/demand/infrastructure, research/development/demonstration, and climate change.	**Consistent.** Future development facilitated by the proposed project would be required to be constructed in accordance with the latest iteration of CALGreen, the California Energy Code, and any locally adopted amendments, which include requirements for the use of energy-efficient design and technologies as well as provisions for incorporating renewable energy resources into building design. Additionally, Policy 6.2 of the Housing Element Update would ensure energy efficiency in all new development facilitated under the project.
AB 1007: State Alternative Fuels Plans. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality. **Bioenergy Action Plan, EO S-06-06.** The EO establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050.	**Consistent**. While the project does not include biofuel facilities, the project would not preclude their use or development in Pacific Grove. Therefore, the project would not interfere with or obstruct the production of biofuels in California.
Title 24, CCR – Part 6 (Building Energy Efficiency Standards) and Part 11 (CALGreen). The 2019 Building Energy Efficiency Standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less. The CALGreen Standards establish green building criteria for residential and nonresidential projects. The 2019 Standards include the following: increasing the number of parking spaces that must be prewired for electric vehicle chargers in residential development; requiring all residential development to adhere to the Model Water Efficient Landscape Ordinance; and requiring more appropriate sizing of HVAC ducts.	**Consistent**. Development facilitated by the project would be required to comply with the City Code, Article IV, Division 1, which mandates the implementation of Title 24.

As shown in Table 4.5-7, the project would be consistent with the energy conservation and efficiency goals, policies, and strategies contained in the City's 1994 General Plan and AMBAG's 2045 MTP/SCS.

Table 4.5-7 Project Consistency with Applicable Energy Efficiency Strategies

Energy Efficiency Goal, Policy, or Strategy	Proposed Project Consistency
Pacific Grove 1994 General Plan and PGMC	
General Plan Transportation Element Policy 7: Limit the increase in Vehicle Miles Traveled (VMT) in accordance with Air Quality Management Plan goals. **General Plan Transportation Element Policy 10:** Encourage design for new and expanded development that facilitates access by transit, walking, bicycles, and carpools.	**Consistent**. The land use scenario envisioned implemented by the project would locate residences and commercial/retail land-uses, which would provide opportunities for employment with an emphasis on infill and mixed-use land uses. As a result, it would decrease VMT per capita by 2.4 and VMT per employee by 3.1 compared to existing conditions, and would decrease VMT per capita by 1.4 and VMT per employee by 1.3 compared to the future no project scenario (see Section 4.14, *Transportation,* and Appendix E). In addition, by co-locating these uses and intensifying infill development, the project would minimize the travel distance required for residents to travel to work and encourage alternative modes of transportation, such as bicycling or walking.
PGMC Chapter 18.04: Enforce State Title 24 building construction requirements and apply standards that promote energy conservation.	**Consistent**. Development facilitated by the project would be required to comply with PGMC Chapter 18.04, which mandates the implementation of Title 24 of the California Building Code, the California Energy Code.
AMBAG 2045 MTP/SCS	
Land-Use Scenario. The 2045 MTP/SCS encourages local agencies to use planning strategies that locate residences and employment in close proximity and increase mixed-use, infill, and high-density development.	**Consistent.** The project encourages mixed-use, infill, and higher density development, which co-locates residences and employment to minimize the distance of travel for those who live and work in the city and encourages the use of active transportation.

Development facilitated by the project would be required to comply with applicable Title 24 standards as well as the polices, implementation plans, and strategies listed above to reduce construction and operational energy use. Similarly, the proposed project would include energy and water efficient appliances through building and landscape design, consistent with CALGreen and Monterey Peninsula Water Management District standards. As a result, the development facilitated by the project would be consistent with applicable state and local plans, regulations, and policies, and would not conflict with or obstruct state or local plans for renewable energy or energy efficiency. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

Impacts would be less than significant without mitigation; therefore, mitigation is not required.

4.5.4 Cumulative Impacts

The geographic scope for cumulative energy impacts includes the geographic area of the City of Pacific Grove. This geographic scope is appropriate as development facilitated by the project and cumulative development would increase energy demands in Pacific Grove. Cumulative development would increase demand for energy resources, but those resources would not be consumed in a wasteful, inefficient, or unnecessary manner. New iterations of the California Building Energy Efficiency Standards and CALGreen would require increasingly more efficient appliances and building materials that reduce energy consumption in new development. In addition, vehicle fuel efficiency is anticipated to continue improving through implementation of the existing Pavley Bill regulations under AB 1493. Projects throughout the State of California are required to adhere to applicable renewable energy and energy efficiency laws, programs, and policies such as California's

renewable portfolio standard, AB 2076, and Title 24 standards. All other pending and future projects in the City would be required to adhere to General Plan policies and the PGMC to mitigate energy impacts where feasible. In addition, all pending and future projects would be reviewed for consistency with the City General Plan and PGMC. Compliance with applicable plans, policies, and regulations would require increasingly more efficient energy use, and cumulative impacts related to energy (Thresholds 1 and 2) would be less than significant.

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4.6 Geology and Soils

This section identifies and evaluates issues related to geology and soils in the context of the project. The section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to geology and soils; and potential impacts related to geology and soils that would result from implementation of the project.

4.6.1 Setting

The project area is the City of Pacific Grove in the western part of Monterey County. The project area is in the Coast Ranges geomorphic province, one of the eleven geomorphic provinces of California (California Geological Survey [CGS] 2002). The Coast Ranges extend along the majority of California's coast from the California-Oregon border to Point Arguello in Santa Barbara County in the south and consist of northwest-trending mountain ranges and valleys. The Coast Ranges are composed of Mesozoic and Cenozoic sedimentary, igneous, and metamorphic strata. The eastern side is characterized by strike-ridges and valleys in the upper Mesozoic strata. The Coast Ranges province runs parallel to and overlaps the San Andreas Fault in some areas (CGS 2002). Specifically, the project area is located on the Monterey Peninsula, which is bounded by the Santa Lucia Range to the southeast, Monterey Bay to the north, and the Pacific Ocean to the west.

a. Earthquake Faults and Surface Rupture

A fault is a fracture or an area of fractures between two units of rock that allow the units to move relative to each other, which can occur slowly over time as creep or rapidly during an earthquake. Earthquake faults are categorized as active, potentially active, and inactive. A fault is classified as active if it has moved during the Holocene epoch, which consists of approximately the last 11,700 years. A fault is classified as potentially active if it has experienced movement within the Quaternary epoch, which is during the last 1.8 million years, but not within the Holocene epoch. A fault is classified as inactive if sufficient geologic evidence indicates that the fault is no longer active. A Quaternary fault is one that has been recognized at the surface and that has moved in the past 1.8 million years(California Department of Conservation [DOC] 2018). The term seismicity describes the effects of seismic waves that are radiated from an earthquake fault in motion. While most of the energy released during an earthquake results in the permanent displacement of the ground, as much as 10 percent of the energy may dissipate immediately in the form of seismic waves. Faults are geologic hazards due to the potential for both surface fault rupture and seismic ground shaking (discussed in the following subsection), which are distinct but related properties. Surface fault rupture is the breakage of ground along the surface trace of a fault, which is caused by the intersection of the fault surface area ruptured in an earthquake with the earth's surface. Surface fault displacement occurs when material on one side of a fault moves relative to the material on the other side of the fault as a result of surface fault rupture. Surface fault rupture and displacement can be very destructive to structures and infrastructure constructed across active faults and within the rupture zone. However, the zone of damage is limited to a relatively narrow area along either side of the fault, as opposed to seismic ground shaking damage, which can be quite widespread. The amount of surface displacement during a rupture event can range from a few inches to tens of feet.

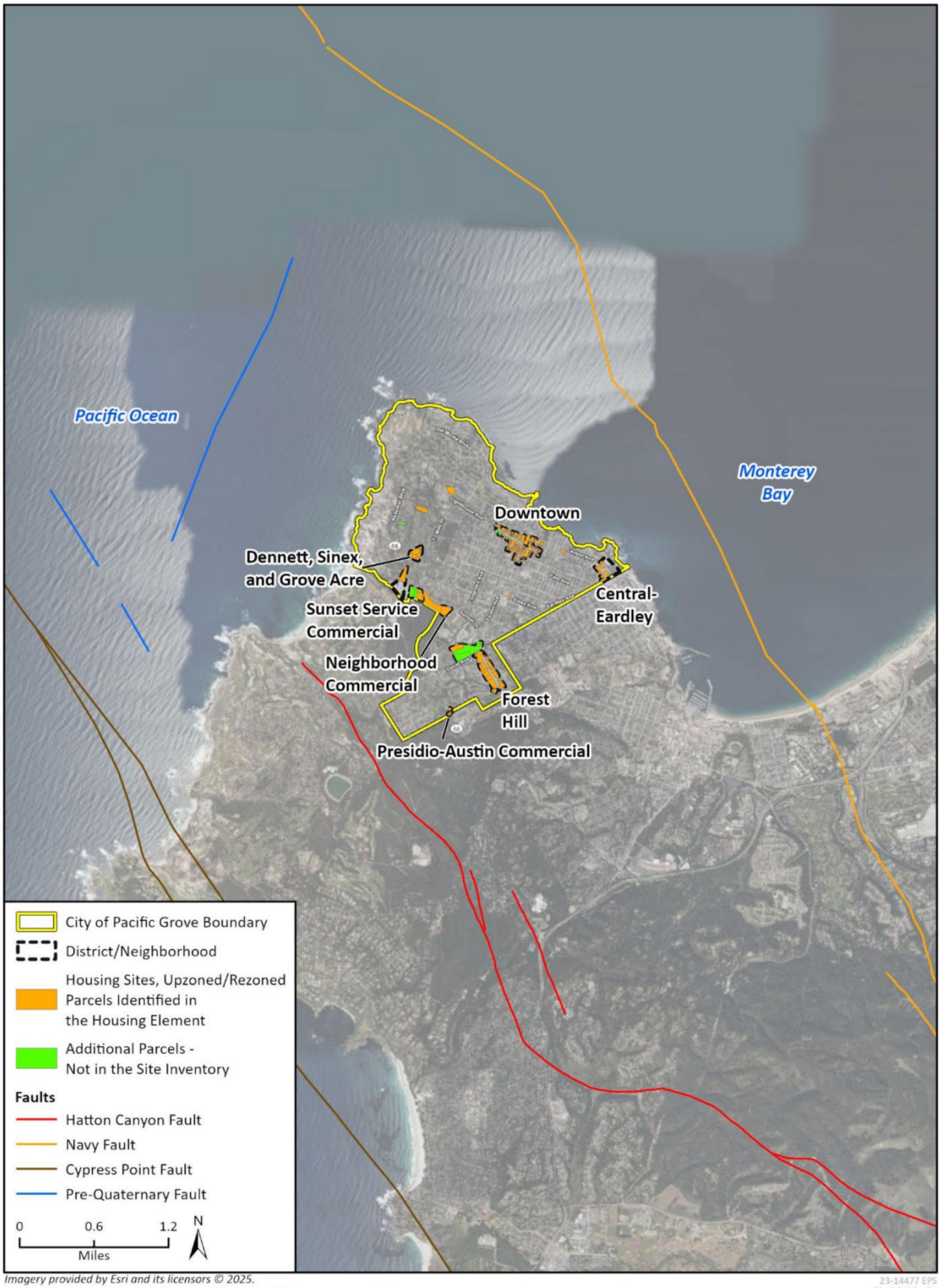
Pacific Grove is proximate to the Hatton Canyon Fault, the Navy Fault, the Cypress Point Fault, and pre-Quaternary faults (defined as faults that have not moved in the past 2.6 million years) as shown in Figure 4.6-1. The city is approximately 25.5 miles from the San Andreas Fault and Paicines Fault (United States Geological Survey [USGS] 2025a). These faults are all capable of affecting the project area. The San Andreas Fault Zone is the dominant active fault in California. It is the primary surface boundary between the Pacific and the North American plate. There have been numerous historic earthquakes along the San Andreas Fault. According to the Pacific Grove General Plan's Health and Safety Element, there are another 15 potentially active faults within Monterey County. Those closest to Pacific Grove are the Navy Fault and Cypress Point Fault. The Navy Fault is a northwest-trending fault that runs through the center of the City of Monterey into Monterey Bay. The Cypress Point Fault also trends northwest, running through the southwestern portion of the Monterey Peninsula, just northeast of Pescadero and Cypress Points. Most faults in Monterey County run parallel to the San Andreas Fault in a northwest direction and are considered sub-units of the San Andreas Fault System (City of Pacific Grove 1994).

USGS estimates there is a 72 percent probability (or likelihood) of at least one earthquake of magnitude 6.7 or greater striking somewhere in the greater San Francisco Bay region before 2043. The 30-year probability of a magnitude 6.7 earthquake on the northern segment of the San Andreas Fault is 21 percent. The San Gregorio–Palo Colorado Fault zone has a 10 percent probability of a magnitude 6.7 or greater earthquake by 2032. The Calaveras-Paicines Fault, which does not run directly through Monterey County, could also be the location of a major earthquake, which would affect Monterey County, including Pacific Grove. The probability of experiencing a magnitude 6.7 or greater earthquake along the Calaveras-Paicines Fault in the next 30 years is 26 percent (County of Monterey 2022: 9-12).

Fault rupture can cause property damage, possibly resulting in injury and loss of life in the event of a major earthquake due to ground motion. Seismically induced ground-shaking could be experienced in the project area due to seismic activity along other faults in California, depending upon the location of the earthquake epicenter and the character and duration of the seismic event. Specific effects of a seismic event on the project area would depend upon characteristics of the underlying soil and rock, as well as the building materials and techniques used in construction. Secondary effects of ground-shaking can lead to other seismic hazards, such as tsunamis, seiches, landslides, liquefaction, lateral spreading, and lurching.

Alquist-Priolo Earthquake Fault Zones are regulatory zones established throughout California by the CGS. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize the fault rupture hazard potential to habitable structures. Pacific Grove is not in an Alquist-Priolo Earthquake Fault Zone (CGS 2025a).

Figure 4.6-1 Seismic Hazards Near Project Area



b. Seismic Ground Shaking

In addition to surface rupture, the major cause of structural damage from earthquakes is seismic ground shaking. The intensity of ground motion expected at a particular site depends on the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking. Greater movement can be expected at sites located on poorly consolidated material, such as alluvium, within close proximity to the ruptured fault, or in response to a seismic event of great magnitude. Strong ground shaking from an earthquake can result in damage to buildings that can shift off their foundations and to underground pipes that can break. The potential for damage is most likely to be minimal where bedrock is located close to the ground surface. Pacific Grove is situated in such an area and can be considered relatively stable. Nevertheless, older buildings constructed before building codes were in effect, and even relatively newer buildings constructed before earthquake resistance provisions were included in building codes in 1933, are the most likely to suffer damage in an earthquake. However, most buildings in Pacific Grove are one or two stories and are predominantly wood frame, which makes them among the most structurally resistant to earthquake damage.

Strong ground shaking can also cause tsunamis. The major California offshore faults close to Monterey Bay are probably strike-slip faults, and earthquakes generated on strike-slip faults are not likely to produce large-scale tsunamis. Thus, tsunami potential associated with a local offshore seismic event is low (City of Pacific Grove 1994).

c. Liquefaction

Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic fine-grained soils lose their structure/strength when subjected to high-intensity ground shaking and act like a liquid. Liquefaction occurs when three general conditions exist: 1) shallow groundwater within the top 50 feet of the ground surface; 2) low-density non-plastic soils; and 3) high-intensity ground motion. When liquefaction occurs, it can result in ground failure that can result in damage to roads, pipelines, and buildings. In areas subject to elevated liquefaction hazards with high groundwater tables, certain types of activities have the potential to exacerbate liquefaction risk, such as groundwater injection and stormwater infiltration.

Lateral spreading, closely related to liquefaction, occurs when a subsurface layer liquefies and gravitational and inertial forces cause the layer, and the overlying non-liquefied material, to move in a downslope direction. The potential for lateral spreading is highest in areas underlain by soft, saturated materials, especially in areas bordered by sloping banks or inclined planes to an adjacent open face bank or slope.

The potential for liquefaction is high primarily in beach and sand dune areas, and in areas close to the shoreline, particularly in the northwestern, Spanish Bay, and Asilomar areas and smaller areas near Downtown (County of Monterey 2025b). The CGS has produced numerous maps that show landslide features and delineate potential slope-stability problem areas. Preparation of these maps has been episodic, often driven by landslide disasters and subsequent legislative mandates. CGS maps Landslide and Liquefaction Zones of Required Investigation in California. There are no Landslide and Liquefaction Zones of Required Investigation in Pacific Grove (CGS 2025b).

d. Landslides and Slope Instability

Landslides occur when slopes become unstable and masses of earth material move downslope. Landslides are usually rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a more-shallow type of slope failure. They typically affect the upper surficial soil horizons rather than bedrock features. Usually, mudslides and slumps occur during or soon after periods of rainfall, but they can also be triggered by seismic shaking. Areas most susceptible to landslides have been mapped by the California Division of Mines and Geology. In addition, landslides occur where faults have fractured rock and along the base of slopes or cliffs where supporting material has been removed by stream or wave erosion or by human activities. Heavy rainfall, human actions, or earthquakes can trigger landslides. They may take the form of a slow continuous movement, such as a slump, or may move very rapidly as a semi-liquid mass, such as a debris flow or avalanche.

Slope disturbance and soil creep from a long-term geologic cycle of uplift, mass wasting, intense precipitation or wind, and gravity can result in slope failure in the form of mudslides and rock fall. Mass wasting refers to a variety of erosional processes from gradual downhill soil creep to mudslides, debris flows, landslides, and rock fall—processes that are commonly triggered by intense precipitation or wind, which varies according to climactic shifts. Often, various forms of mass wasting are grouped together as landslides, which are generally used to describe the downhill movement of rock and soil. Soil creep is a long-term, gradual downhill migration of soil under the influence of gravity and is generally on the order of a fraction of an inch per year. These soils can gradually creep downslope from the sides of foundations, reducing lateral support.

There are no areas of moderate to high landslide potential in Pacific Grove based on soil stability levels (CGS 2025c). No significant landslides have been recorded in the city, and no significant areas of landslide susceptibility have been identified.

Historic average beach and dune erosion in Southern Monterey Bay (from Moss Landing to Pacific Grove) is approximately 2.6 feet a year and higher than any other region in the state. Historically, the highest dune erosion rates have occurred in the former Fort Ord area (7.0 feet annually) and Marina (4.5 feet annually) because of wave refraction patterns that produce larger waves. Long-term historic erosion rates in this area have been variable (County of Monterey 2022). Most of Pacific Grove is categorized as having moderate erosion hazards, with coastal areas having high erosion hazards (County of Monterey 2025c).

e. Subsidence

Subsidence or settlement can occur from immediate settlement, consolidation, shrinkage of expansive soil, and liquefaction. Immediate settlement occurs when a load from a structure or placement of new fill material is applied, causing distortion in the underlying materials. This settlement occurs quickly and is typically complete after placement of the final load. Consolidation settlement occurs in saturated clay from the volume change caused by squeezing out water from the pore spaces. Consolidation occurs over a period of time and is followed by secondary compression, which is a continued change in void ratio[1] under the continued application of the load. Soils tend to settle at different rates and by varying amounts depending on the load weight or changes in properties over an area, which is referred to as differential settlement. Areas underlain by soft sediments or undocumented fills are most prone to settlement.

[1] The void ratio of a soil is the ratio of the volume of the empty spaces between solid particles to the volume of solid particles in the soil.

Natural subsidence occurs from shifting of tectonic plates and dissolution of limestone and can produce sinkholes. Human-induced subsidence can occur from pumping water, oil, or gas from underground reservoirs; collapse of underground mines; drainage of wetlands; and soil compaction. Subsidence can be problematic because it threatens the stability of roads, bridges, canals, and other infrastructure. Soils particularly subject to subsidence include those with high silt or clay content. Soils with high shrink-swell potential can be particularly susceptible to subsidence during a loss of soil moisture. The USGS documents areas of known subsidence in California. No known areas of subsidence are in the project area (USGS 2025b).

f. Expansive and Corrosive Soils

Corrosive soils are considered a geologic hazard because they react with concrete and ferrous metals, which can cause damage to foundations and buried pipelines. Except for rocky outcroppings, soils in Pacific Grove consist of sand or sandy loam (City of Pacific Grove 1994). In general, sand and sandy soils are considered to have the lowest corrosion potential of all soil types (Nandi 2020); therefore, corrosive soils are not evaluated further. Soils with relatively high clay content are expansive due to the capacity of clay minerals to take in water and swell (expand) to greater volumes. Expansive soils are also considered a geologic hazard because an increase in soil volume can exert forces on structures and, thus, damage building foundations, walls, and floors. Differential settlement is a phenomenon that occurs when one portion of a building's foundation settles unevenly relative to other potions. In general, areas are susceptible to differential settlement if underlain by compressible sediments, such as poorly engineered artificial fill or loose unconsolidated alluvial sediments. When these soils dry out and shrink, structural damage can occur.

Within Pacific Grove, areas where expansive soils are located may experience subsidence. When fill or structure loads are placed on these soils for development, flood control, or other purposes, settlement can result. According to the United States Department of Agriculture Natural Resources Conservation Service, most of the city's soil types, aside from coastal beaches and sand dunes, are Baywood Sand (2 to 15 percent slopes), Sheridan Coarse Sandy Loam (5 to 15 percent slopes), Tangair Fine Sand (2 to 9 percent slopes), and Narlon Loamy Fine Sand (2 to 9 percent), all of which have a low shrink-swell potential (Natural Resources Conservation Service 2025).

Current provisions of the California Building Code (CBC) contain requirements for slab-on-ground building foundations located on expansive soils. If expansive soils are detected based on a preliminary soil report, the CBC requires the preparation of a soil investigation prior to construction and incorporation of appropriate corrective actions to prevent structural damage, to be determined on a project-by-project basis.

g. Radon Gas

Radon is a cancer-causing natural radioactive gas that is invisible, odorless, and tasteless. Radon forms from the radioactive decay of small amounts of uranium naturally present in the rocks and soil. It can affect indoor air quality, particularly in mountainous areas. Radon gas from natural sources can accumulate in buildings and is a leading cause of non-smoking lung cancer deaths. Geologic unit radon potentials have been developed using short-term indoor-radon measurement data. Pacific Grove is reported to have a low potential for radon levels to exceed 4.0 Picocuries per Liter (DOC 2007).

h. Paleontological Resources

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (trackways, imprints, burrows, etc.). Paleontological resources occur within bedrock geologic deposits that underly the soil layer and are almost exclusively preserved in sedimentary rocks; however, in rare cases, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions. The Society of Vertebrate Paleontology (SVP; 2010) has defined fossils as being remains or traces of plants and animals that are greater than 5,000 years old (i.e., older than middle Holocene in age). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors.

The paleontological sensitivity of the geologic units that underlie the project area were evaluated to assess the potential for presence of scientifically important paleontological resources. Paleontological sensitivity refers to the potential for a geologic unit to produce scientifically significant fossils. Sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey.

The project area is located within the *Monterey, California* and *Monterey OE N, California* United States Geological Survey 7.5-minute topographic quadrangles. The seven geologic units underlying the project area, and their corresponding paleontological sensitivity, are shown in Figure 4.6-2.

Quaternary Alluvium

Quaternary alluvium underlies a small part of the project area. Quaternary alluvium consists of unconsolidated, poorly sorted clay- to boulder-sized sediment that is Holocene in age (Clark et al. 1997). Holocene-aged sediments are generally considered too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary alluvium has low paleontological sensitivity.

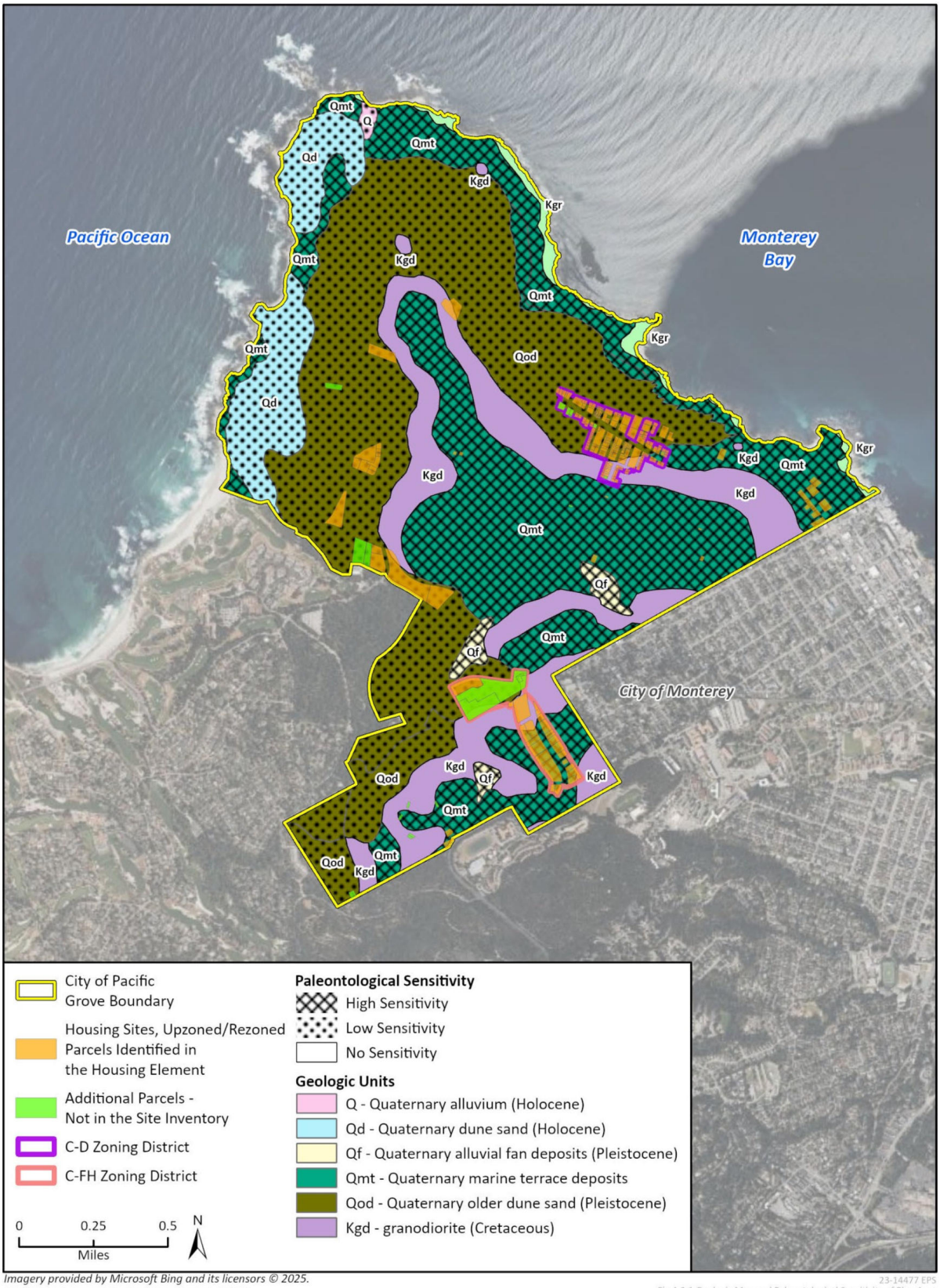
Quaternary Dune Sand

Quaternary dune sand underlies much of the project area. Quaternary dune sand consists of unconsolidated, well-sorted, fine- to medium-grained sand that is Holocene in age (Clark et al. 1997). Holocene-aged sediments are generally considered too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary dune sand deposits have low paleontological sensitivity.

Quaternary Alluvial Fan Deposits

Quaternary alluvial fan deposits underlie several small portions of the project area. Quaternary alluvial fan deposits consist of poorly sorted sand, silt, and gravel, and are late Pleistocene in age (Wagner et al. 2002). Pleistocene-aged alluvial sediments are known to produce paleontological resources in Monterey County, including mastodon (*Mammut*), horse (*Equus*), and invertebrates (Jefferson 2010; Paleobiology Database [PBDB] 2024; University of California Museum of Paleontology 2024). Given the fossil-producing history of similar sediments in the region, Quaternary alluvial fan deposits have high paleontological sensitivity.

Figure 4.6-2 Geologic Map and Paleontological Sensitivity of Project Area



Imagery provided by Microsoft Bing and its licensors © 2025.
Additional data provided by Wagner et al. (2002).

23-14477 EPS
Fig 4.6-1 Geologic Map and Paleontological Sensitivity of Plan Area

Quaternary Older Dune Sand

Quaternary older dune sand underlies large portions of the project area. Quaternary older dune sand consists of weakly consolidated, well-sorted, fine-to medium-grained sand that are late Pleistocene in age (Clark et al. 1997). Coastal dune deposits very rarely preserve fossils in California (Jefferson 2010; PBDB 2024; University of California Museum of Paleontology 2024). Therefore, Quaternary older dune sand deposits have low paleontological sensitivity.

Quaternary Marine Terrace Deposits

Quaternary marine terrace deposits underlie much of the project area. Quaternary marine terrace deposits consist of semi-consolidated, moderately sorted sand with thin, discontinuous gravelly layers (Clark et al. 1997). Clark et al. (1997) mapped five distinct marine terraces within Pacific Grove, but their lithology and paleontological sensitivity are identical, so they are combined in this analysis. Quaternary marine terrace deposits represent Pleistocene-aged, near-shore marine environments. Marine terrace deposits have produced vertebrate and invertebrate fossils throughout California, including around Monterey Bay (Bradley and Addicott 1968; Jefferson 2010; Powell et al. 2004). Given the fossil-producing history of similar sediments, Quaternary marine terrace deposits have high paleontological sensitivity.

Granodiorite and Quartz Diorite

Granodiorite is found throughout the central and southern project areas, whereas quartz diorite forms some of the cliffs in the northwestern part of the project area. Both geologic units are Cretaceous in age and are intrusive igneous rocks, meaning they formed via the cooling of molten rock below Earth's surface (Clark et al. 1997). These conditions cannot preserve paleontological resources (SVP 2010), and therefore, granodiorite and quartz diorite have no paleontological sensitivity.

4.6.2 Regulatory Setting

a. Federal Regulations

National Earthquake Hazards Reduction Program

The National Earthquake Hazards Reduction Program was established by the United States Congress when it passed the Earthquake Hazards Reduction Act of 1977, Public Law 95-124. In establishing the National Earthquake Hazards Reduction Program, Congress recognized earthquake-related losses could be reduced through improved design and construction methods and practices, land use controls and redevelopment, prediction techniques and early warning systems, coordinated emergency preparedness plans, and public education and involvement programs. The four basic goals are as follows:

- Develop effective practices and policies for earthquake loss reduction and accelerate their implementation.
- Improve techniques for reducing earthquake vulnerabilities of facilities and systems.
- Improve earthquake hazards identification and risk assessment methods, and their use.
- Improve the understanding of earthquakes and their effects.

Several key federal agencies contribute to earthquake mitigation efforts. There are four primary National Earthquake Hazards Reduction Program agencies:

- National Institute of Standards and Technology of the Department of Commerce
- National Science Foundation
- USGS
- Federal Emergency Management Agency

Implementation of National Earthquake Hazards Reduction Program priorities is accomplished primarily through original research, publications, and recommendations to assist and guide state, regional, and local agencies in the development of plans and policies to promote safety and emergency planning.

Landslide Hazard Program

USGS created the Landslide Hazard Program in the mid-1970s; the primary objective of the program is to reduce long-term losses from landslide hazards by improving our understanding of the causes of ground failure and suggesting mitigation strategies. The federal government takes the lead role in funding and conducting this research, whereas the reduction of losses due to geologic hazards is primarily a state and local responsibility. In Monterey County, plans and programs designed for the protection of life and property are coordinated by the Monterey County Health Department.

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority in California is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards on behalf of the United States Environmental Protection Agency. Pacific Grove is within the jurisdiction of the Central Coast Regional Water Quality Control Board.

While the CWA is primarily associated with protecting and enhancing surface water quality, some regulatory provisions of the CWA help to control erosion and soil loss and compliance with these provisions can help mitigate potential impacts to geology and soils. In particular, the SWRCB administers the NPDES Construction General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction Stormwater General Permit) (Order 2022-0057-DWQ). The Construction General Stormwater Permit is discussed further below in b., *State Regulations*.

Disaster Mitigation Act of 2000

Congress passed the Disaster Mitigation Act of 2000 to amend the Robert T. Stafford Disaster Relief and Emergency Assistance Act by invoking new and revitalized approaches to mitigation planning. Section 322 of the act emphasizes the need for state and local government entities to closely coordinate mitigation planning activities and makes the development of a hazard mitigation plan a specific eligibility requirement for any local government applying for federal mitigation grant funds. Communities with an adopted and federally-approved hazard mitigation plan thereby become pre-

positioned and more apt to receive available mitigation funds before and after the next declared disaster. To implement the new Stafford Act provisions, the Federal Emergency Management Agency published requirements and procedures for local hazard mitigation plans in the Code of Federal Regulations (CFR) at Title 44, Chapter 1, Part 201.6. These regulations specify minimum standards for developing, updating, and submitting local hazard mitigation plans for Federal Emergency Management Agency review and approval at least once every five years.

b. State Regulations

California Building Code

Part 2 of Title 24 of the California Code of Regulations is the CBC, a set of regulations that governs the design and construction of buildings in California. The purpose of the CBC is to establish minimum standards to safeguard public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of building and structures. The CBC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. It also regulates grading activities, including drainage and erosion control. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures. The earthquake design requirements of the CBC take into account the occupancy category of the structure, site class, soil classifications, and various seismic coefficients, which are used to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motions at the site and ranges from SDC A (very small seismic vulnerability) to SDC E/F (very high seismic vulnerability and near a major fault). Design specifications are then determined according to the SDC.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 was passed into law following the destructive February 9, 1971, San Fernando earthquake that had a moment magnitude (Mw) of 6.6. The main purpose of the act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps, known as Alquist-Priolo maps (CGS 2025a). The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Generally, structures for human occupancy must be set back from active faults by approximately 50 feet. Therefore, if a project area is in an active earthquake fault zone, the local agency must withhold development permits until geologic investigations demonstrate the site is not threatened by surface displacement from future faulting. The City of Pacific Grove does not contain any active Alquist-Priolo Earthquake Fault Zones.

Seismic Safety Act

The Seismic Safety Act established the California Seismic Safety Commission in 1975 with the intent of providing oversight, review, and recommendations to the Governor and State Legislature regarding seismic issues. The commission's name was changed to the Alfred E. Alquist Seismic Safety Commission in 2006. Since then, the Commission has adopted several documents based on recorded earthquakes, such as the 1906 San Francisco earthquake and the 1989 Loma Prieta earthquake.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (Public Resources Code [PRC] Chapter 7.8, Section 2690-2699.6) was passed into law following the destructive October 17, 1989, 6.9 magnitude Loma Prieta earthquake. The act directs CGS to delineate Seismic Hazard Zones. In accordance with the mapping criteria, the CGS seismic hazard zone maps identify areas with the potential for a ground shaking event that corresponds to a 10-percent probability of exceedance in 50 years. The purpose of the act is to reduce the negative implications of seismic hazards to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and state agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The act requires site-specific preparation of geotechnical investigations, including mitigation measures based on site-specific conditions, prior to permitting most urban development projects in seismic hazard zones.

California Public Resources Code Section 5097.5

PRC Section 5097.5 states "no person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface" any "vertebrate paleontological site" on public lands without the "permission of the public agency having jurisdiction over such lands." Violation of this section is a misdemeanor. As used in PRC Section 5097.5, "public lands" means lands owned by or under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

Construction Stormwater General Permit

The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by SWRCB, regulates construction activities that include clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities and requires all developers of land where construction activities will occur over more than one acre to do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a SWPPP that specifies construction best management practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction Stormwater General Permit, a project applicant must electronically file all permit registration documents with SWRCB prior to the start of construction. Permit registration documents must include a Notice of Intent, Risk Assessment, site map, SWPPP, annual fee, and signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control discharges from groundwater dewatering, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The Construction Stormwater General Permit also includes groundwater dewatering requirements for projects not covered under a De Minimis or Low Threat Discharge Permit. The dewatering requirements mandate dischargers to implement BMPs to control the volume and velocity of dewatering discharges. The Construction Stormwater General Permit also requires testing and treatment, if necessary, of groundwater discharge to verify the discharge meets or exceeds the effluent limitations specified in the permit.

c. Local Regulations

2022 Multi-Jurisdictional Hazard Mitigation Plan

The City adopted the 2022 Multi-Jurisdictional Hazard Mitigation Plan, prepared for the County of Monterey in partnership with local governments within the county, on August 6, 2022. This plan describes the process for identifying hazards, risks, and vulnerabilities; identifying and prioritizing mitigation actions; encouraging the development of local mitigation; and providing technical support for those efforts. The Multi-Jurisdictional Hazard Mitigation Plan mentions that numerous major faults in the region could cause strong ground shaking in the city (County of Monterey 2022).

Pacific Grove General Plan

The current City of Pacific Grove General Plan Health and Safety Element inventories and assesses major hazards that may affect Pacific Grove, including seismic and geologic hazards, erosion, fire, flooding, and noise. The existing Health and Safety Element contains goals and policies to minimize the potential for loss of life, physical injury, property damage, and social disruption resulting from seismic ground shaking and other geologic events; for example, including a policy to require the design of underground utilities, including water and natural gas mains, to withstand seismic forces.

The project analyzed in this DEIR includes an update of the Health and Safety Element. As discussed further in Chapter 2, *Project Description,* the proposed updates to the Health and Safety Element include the assessment of evacuation routes and capacity and a climate change vulnerability assessment to comply with state law, and new or amended policies related to this evaluation. The amendments would support future City planning efforts and would continue to minimize risks associated with identified hazards, such as a major seismic ground shaking event.

Pacific Grove Local Coastal Program and Implementing Ordinances

The City adopted the Local Coastal Program, including the Land Use Plan and Implementing Ordinances, on January 15, 2020. The Plan was certified by the California Coastal Commission on March 11, 2020. The Land Use Plan, in combination with a separately published Implementation Plan, comprises Pacific Grove's Local Coastal Program which governs land use and development in

the Pacific Grove Coastal Zone. The Land Use Plan contains several policies related to geology and soils in the Coastal Zone, including:

- **HAZ-8.** Development shall minimize risks to life and property in areas of high geologic, flood, and fire hazard. Development shall also assure stability and structural integrity, shall not create nor contribute significantly to erosion, geologic instability, or destruction of the site, and shall not substantially alter natural landforms. Public infrastructure, public recreational access facilities, and coastal-dependent development shall be developed in a manner consistent with Policy HAZ-10, and may qualify for shoreline protective devices only if in imminent danger from erosion consistent with HAZ-15 and HAZ-16. All other development shall be developed in a manner consistent with Policy HAZ-9.
- **HAZ-9.** Development shall be sited and designed to avoid impacts from coastal hazards, including but not limited to, erosion, episodic and long-term shoreline retreat, flooding, inundation, storm waves, high seas, tidal scour, and tsunamis, including in relation to sea level rise, over the life of the development. As a condition of approval for all coastal development that at some point during its lifetime may be subject to coastal hazards, the Applicant shall record a deed restriction against the properties involved in the application acknowledging that the development site may be subject to coastal hazards.
- **MAR-3.** To reduce the potential for degradation or impairment of water quality, including the Pacific Grove Marine Gardens State Marine Conservation Area and Area of Special Biological Significance, the City will continue to investigate and implement new measures to reduce potential pollutants in storm water and irrigation runoff and require the following:
  - No diking, filling, dredging, or other uses inconsistent with the terms of the grant of tidal protection from the State of California or Coastal Act Policy 30233 shall be allowed in the City's tidelands.
  - Development shall include specific measures to help reduce potential pollutants and water quality impairment, including controlling the disposal of chemicals and hazardous materials, controlling the use of pesticides and herbicides, maintaining existing storm water capture programs, applying low impact development designs and requiring on-site retention and/or reuse of runoff.
  - The City will utilize ecologically responsible pest control methods and integrated pest management to the extent feasible on public property and encourage this practice on private property.
  - Drainage plans and erosion, sediment and pollution control measures shall be required as conditions of approval of every application for new development that has the potential to impair water quality.
  - Development that has the potential for water quality impairment shall, at a minimum, be designed to meet National Pollutant Discharge Elimination System stormwater runoff requirements.
  - Construction phase storm water pollutant controls shall be required for development that has the potential for water quality impairment, including erosion controls, sediment traps and filtering of off-site storm water flows, capture of site-generated pollutant sources, street sweeping of dirt tracked offsite, litter control, post-construction monitoring, and other best management practices. Construction-phase water quality impacts shall be avoided by minimizing the disturbed area, phasing grading activities, implementing soil stabilization and pollution prevention measures, and preventing unnecessary soil compaction.

- **MAR-6.** Plan, site, and design development in a manner that maintains or enhances on-site infiltration, reduces runoff, minimizes the transport of pollutants in runoff generated from the development, and recharges groundwater. Runoff shall be appropriately collected, filtered, and treated by Best Management Practices (BMPs) to minimize pollutant loading to the maximum degree feasible.

Pacific Grove Municipal Code

Several sections of Pacific Grove Municipal Code (PGMC) regulate hazards related to geology and soils and intend to avoid or eliminate such hazards. Chapter 18.04 of the PGMC adopts the California Building Code and Appendices I and J by reference. Chapter 9.30 of the PGMC sets forth standards for stormwater management and discharge control. Specifically, Section 9.30.130 requires appropriate BMPs to be implemented for construction activities to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects to minimize the generation, transport and discharge of pollutants. The City incorporates BMP requirements into land use entitlements and construction or building permits for development or redevelopment projects.

Chapter 18.40 of the PGMC requires the preparation of an engineering report to determine the existence, nature and extent of structural deficiencies which could result in collapse or partial collapse of the building or in the anchoring of external hazards for specific existing buildings. Chapter 24.24 of the PGMC requires that every approved map for proposed subdivisions must be conditioned on compliance with the requirements for grading and erosion control, including the prevention of sedimentation or damage to off-site property.

Chapter 24.28 of the PGMC requires the preparation of soils reports and investigations for subdivision development.

Section 18.21.010 of the PGMC requires that all utilities must be placed underground for new construction, except for single-family dwellings in an R-1 zone. Additionally, if a property undergoes significant remodeling that requires the electrical system to be brought up to code, or if the use of the structure changes to something other than a single-family dwelling in an R-1 zone, the utilities must also be placed underground. However, equipment related to underground facilities, such as surface-mounted transformers, pedestal-mounted terminal boxes, meter cabinets, and concealed ducts, are exempt from these requirements.

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The project's impacts related to geology and soils are evaluated based on a review of the underlying geology and soil conditions in the project area; the project's adherence to local, state, and federal requirements; the nature of proposed soil disturbance, construction and operational activities, and its potential to expose people or structures to geologic hazards, including fault rupture, ground shaking, liquefaction, landslides, erosion, lateral spreading, subsidence, collapse, and expansive soils; the nature of proposed development and its potential to require on-site wastewater systems; and the potential for the project to uncover and/or destroy a unique paleontological resource.

Paleontological Resources Sensitivity

Absent specific agency guidelines, most professional paleontologists in California adhere to guidelines set forth by the Society of Vertebrate Paleontology in its "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources" (SVP 2010). These guidelines establish detailed protocols for the assessment of the paleontological resource potential, or "sensitivity" of a project area and outline measures to follow in order to mitigate adverse impacts to known or unknown fossil resources during project development. Using baseline information gathered during a paleontological resource assessment, the paleontological resource potential of the geologic unit(s) or members thereof underlying a project area can be assigned to a high, undetermined, low, or no paleontological sensitivity category. These criteria are based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. While these standards were specifically written to protect vertebrate paleontological resources, all fields of paleontology have adopted these guidelines.

Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, rare, diagnostically important, or are common but have the potential to provide valuable scientific information for evaluating evolutionary patterns and geologic processes. New or unique specimens can provide new insights into evolutionary history; however, additional specimens of even well-represented lineages can be equally important for studying evolutionary patterns and processes, and evolutionary rates. As such, common fossils, especially vertebrates, may be scientifically important, and therefore considered highly significant.

In general, for geologic units with high sensitivity, full-time monitoring is recommended during any project-related ground disturbance. For geologic units with low or no sensitivity, protection or salvage efforts are not required. For geologic units with undetermined sensitivity, field surveys by a qualified paleontologist are usually recommended to specifically determine the paleontological potential of the rock units present within the project area .

Rincon assessed the paleontological sensitivity of each of the geologic units underlying the project area to SVP (2010) guidelines. The sensitivity assignments were made based on review of primary scientific literature, geologic maps, and online fossil databases.

Significance Thresholds

In accordance with Appendix G of the *CEQA Guidelines*, the project would result in a significant impact if it would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. 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,
    b. Strong seismic ground shaking,
    c. Seismic-related ground failure, including liquefaction,
    d. Landslides;
2. Result in substantial soil erosion or the loss of topsoil;

3. 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;
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property;
5. 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; and/or
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

b. Project Impacts and Mitigation Measures

Threshold 1(a):	Would the project 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?

Impact GEO-1 THE PROJECT WOULD NOT 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. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.6.1, *Setting,* and in the Multi-Jurisdictional Hazard Mitigation Plan, several faults are active near Pacific Grove. The city is proximate to the Hatton Cayon Fault, Navy Fault, and the Cypress Point Fault. However, the project area is not located directly in an Alquist-Priolo Earthquake Fault Zone. The closest Alquist-Priolo Earthquake Fault Zone is the San Andreas Fault Zone, approximately 25.5 miles northeast of the city. Due to the distance between the project area and known fault zones, surface rupture within the project area is unlikely to occur.

The project would not 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. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 1(b):	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Impact GEO-2 THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING STRONG SEISMIC GROUND SHAKING. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Seismic ground shaking is the result of an earthquake, and the impacts can be widespread. Although a function of earthquake intensity, ground shaking effects can be magnified by the underlying soils

and geology, which may amplify shaking at great distances. It is difficult to predict the magnitude of ground shaking following an earthquake, as shaking can vary widely within a relatively small area. The city is proximate to the Hatton Cayon Fault, Navy Fault, and the Cypress Point Fault. The city is approximately 25.5 miles from the San Andreas Fault and Paicines Fault, and these faults are all capable of causing ground shaking the project area. Any of these faults could produce strong seismic ground shaking in the project area in the event of an earthquake.

The project would facilitate the development of a net increase of 2,335 housing units and 292,578 square feet of commercial space throughout the city, with development concentrated on the identified housing sites, upzoning areas, and additional parcels. New development in the project area would potentially expose additional structures and people to strong seismic ground shaking associated with the Hatton Cayon Fault, Navy Fault, Cypress Point Fault, San Andreas Fault, and Paicines Fault. The project would facilitate redevelopment on infill sites, which would in many cases replace older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects of strong ground shaking. In addition, new development facilitated by the proposed project would be subject to PGMC and CBC engineering design and construction measures and requirements. Development designed in accordance with the CBC would be able to: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage, but with some non-structural damage; and 3) resist major earthquakes without collapse, but with some structural, as well as non-structural, damage. Compliance with the CBC would minimize potential structural damage and the exposure of people to the risk of injury or death from structural failure. Foundations and other structures or features would be designed to resist and absorb damaging forces from strong ground shaking in accordance with CBC requirements. Specifically, Section 1613 of the CBC requires every structure and portion thereof, including nonstructural components that are permanently attached to structures and their supports and attachments, to be designed and constructed to resist the effects of earthquake motions. Additionally, Section 18.21.010 of the PGMC requires that all utilities must be placed underground for new construction, except for single-family dwellings in an R-1 zone, and for properties with significant remodeling, which reduces risk associated with injury, loss, and death from the breaking and falling of utilities from strong ground shaking.

The project itself would not exacerbate existing seismic ground shaking hazards in that it would not increase the likelihood or strength of future earthquakes. With adherence to existing structural design requirements, future development facilitated by the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 1(c):	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Impact GEO-3 THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.6.1, *Setting*, there are no Landslide and Liquefaction Zones of Required Investigation in Pacific Grove, indicating a low potential for substantial adverse effects involving seismic-related ground failure and liquefaction (CGS 2025a). There is some potential for liquefaction in the city primarily in beach and sand dune areas, and in areas close to the shoreline, particularly in the northwestern, Spanish Bay, and Asilomar areas and in smaller areas in and near the Downtown District (County of Monterey 2025b).

Full buildout facilitated by the project would increase population, structural development, and infrastructure that may be exposed to potential hazards associated with liquefaction. However, the City of Pacific Grove is not within any liquefaction hazard zones. Additionally, proper engineering and required compliance with CBC and other City requirements would reduce the risk to life or property associated with liquefaction hazards. This includes CBC Chapter 16 and 18, which include seismic and foundation design standards related to liquefaction hazards. In addition, development located in areas with landslide or liquefaction potential would be subject to standard building procedures to review potential development at the project-specific level. The City's review process would ensure that appropriate recommendations implemented and development that would be facilitated by the project would not exacerbate risks associated with seismic related ground failure, including liquefaction. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 1(d):	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Impact GEO-4 THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING LANDSLIDES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.6.1, *Setting*, there are no areas susceptible to landslide hazards in Pacific Grove (CGS 2025b).

Development facilitated by the project would not cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Future development in Pacific Grove would be required to adhere to recommended design measures to ensure hazards related are adequately mitigated. This includes Chapters 18 and 33 of the CBC, which provide requirements for grading, slope stability, and foundation design in landslide-prone areas. Moreover, the project would facilitate projects that would replace older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects associated with unstable soils and liquefaction. PRC Section 2690-2699.6, and CBC requirements as adopted in the PGMC would minimize the risk to life or property associated with landslides.

Compliance with the CBC and PGMC would ensure that potential impacts associated with landslides would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project result in substantial soil erosion or the loss of topsoil?

Impact GEO-5 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Development facilitated by the project would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. Construction activities that disturb one or more acres of land surface are subject to the NPDES Construction Stormwater General Permit (Order 2022-0057-DWQ) issued by the SWRCB (United States Environmental Protection Agency 2024). Some housing sites in the Downtown District (Site 9); Forest Hill Commercial District (Sites 21 and 29); Dennett, Sinex, and Grove Acre Neighborhood (Site 39); Other Areas (Sites 47, 49, 50, 53, 55, and 56); and additional parcels (Sites A10 and A11) are greater than one acre in size. Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require the development of a SWPPP, which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary. Most identified housing sites and additional parcels are less than one acre, but sites that are one acre or larger would be subject to this requirement, including sites that may be consolidated. Sites smaller than one acre would be subject to Chapter 9.30 of the PGMC, which sets forth standards for stormwater management and discharge control and requires implementation of stormwater BMPs.

As discussed in Section 4.6.1, *Setting*, the areas of Pacific Grove most prone to erosion are coastal areas and bluffs. The only housing sites near coastal areas and bluffs are sites in the Central-Eardley District. Compliance with CBC Chapter 18 would ensure that erosion control measures such as site drainage and soil stabilization are implemented. Regardless of individual site size, construction activities for development facilitated by the project would be required to comply with the stormwater control requirements of PGMC Chapter 9.30, which requires developers to implement BMPs for construction activities to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects. BMPs typically include a plan for erosion and sediment control practices to prevent substantial soil erosion or loss of topsoil. Adherence to these BMPs would reduce potential impacts related to soil erosion.

Projects in the Pacific Grove Coastal Zone would be required to adhere to the Land Use Plan and Implementing Ordinances (applicable to Sites 10, 11, 12, 19, and 56 as shown in Figure 2-7 and Figure 2-10 in Chapter 2, *Project Description*). Policies MAR-3 and MAR-6 require development projects to prevent stormwater runoff and implement erosion control methods. Compliance with

the requirements of the City's Municipal Code and the Land Use Plan and Implementing Ordinance for the Coastal Zone would reduce the potential for construction and soil disturbance for development facilitated by the project to cause erosion or the loss of topsoil by ensuring proper management of loose and disturbed soil.

With adherence to State and local regulations, facilitated by the project would result in less than significant impacts related to soil erosion and the loss of topsoil.

Operation

After completion of construction activities facilitated by the project, ground surfaces would be either hardscape or maintained landscaping, and no large areas of exposed soils would be left to erode off individual sites. Many of the identified housing sites, upzoning areas, and additional parcels have already been developed and contain some amount of existing impervious surfaces. Development within currently undeveloped sites would be required to implement erosion control measures, such as landscaping, soil stabilization, or other BMPs to prevent long-term erosion. Therefore, operation of development facilitated by the project would not result in substantial soil erosion or the loss of topsoil, and no impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the project 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?

Impact GEO-6 THE PROJECT WOULD NOT 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. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The project area is located in a seismically active region and development facilitated by the project could be located on unstable geologic units or soils. The potential for the project to result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse is discussed in the following subsections.

Landslide

As discussed under Impact GEO-4, the project area is not located within a landslide hazard zone. The project area is generally flat. Relatively small portions of the city contain slopes over 30 percent: Calabrese Canyon, some coastal bluffs, Benito Avenue, Piedmont Avenue, Hillside Avenue, Adobe Lane, and Syida Drive (City of Pacific Grove 1994). No project sites are located on coastal bluffs, Piedmont Avenue, or Hillside Avenue. Three sites included in this project (provided in Table 2-9) are on Benito Avenue (A7, A8, and A9) and are thus on or near steeper slopes. Ground-disturbing activities associated with development facilitated by the project would not have the potential to result in on- or off-site landslides. PRC Section 2690-2699.6, and CBC requirements as adopted in the PGMC would minimize the risk to life or property associated with landslides. Compliance with PRC Section 2690-2699.6, CBC Chapters 16 and 18, and PGMC grading and erosion control regulations minimizes landslide risks by requiring site-specific geotechnical investigations, slope stabilization, deep foundations, and proper drainage, ensuring impacts remain less than significant.

Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure that occurs on gentle slopes or flat areas, when poorly drained soils lose pressure during ground shaking and fall apart. As discussed in Section 4.6.1, *Setting*, most of the city's soil types are Baywood Sand, Sheridan Coarse Sandy Loam, Tangair Fine Sand, and Narlon Loamy Fine Sand. Narlon Loamy Fine Sand is the only soil type of these mentioned that has poor drainage and could be subject to lateral spreading. There are areas of Narlon Loamy Fine Sand east of Grove Acre Avenue and south of Laurel Avenue, extending east into Monterey and south of Sunset Drive into the location of Pacific Grove High School. Sites 42, 43, 44, 46, 50, 51, 53, 55, and sites in the southern end of the Downtown District (Sites 4, 9, 58, and 60) are located on Narlon Loamy Fine Sand. However, development facilitated by the project would be required to be designed in accordance with CBC requirements. Specifically, structures would be designed to withstand ground failure and lateral spreading with some damage, and foundations and other structures for features would be designed to resist and absorb damaging forces from lateral spreading. In addition, allowable increases in height as a result of the project could require foundations and other structural support features to be more robust to support the additional height; however, compliance with CBC regulations would ensure that the buildings would meet seismic safety standards. Compliance with the CBC would reduce the potential for on- or off-site lateral spreading, and this impact would be less than significant.

Subsidence and Collapse

Subsidence and collapse are the downward vertical movement or shrinking of the ground surface, which can be caused by natural activity (e.g., ground shaking or sinkholes) or human activity (e.g., drilling or groundwater dewatering). Development facilitated by the project would require ground disturbance and could require groundwater dewatering during construction, if groundwater is encountered (refer to Section 4.9, *Hydrology and Water Quality*, regarding the presence of groundwater in the project area). However, development facilitated by the project would not involve substantial, long-term dewatering such that subsidence would result. Accordingly, the project would not have the potential to result in subsidence or collapse, and there would be no impact.

Liquefaction and Settlement

There are no Landslide and Liquefaction Zones of Required Investigation in Pacific Grove (CGS 2025c). However, there is the potential for liquefaction in the city primarily in beach and sand dune areas, and in areas close to the shoreline, particularly in the northwestern, Spanish Bay, and Asilomar areas and in smaller areas in and near the Downtown District. The sites proposed for development and redevelopment, including sites in the Forrest Hill Commercial District and the southern edge of the Sunset Service Commercial District, are in some of the areas with high potential for liquefaction. Full buildout of the project would increase population, structural development, and infrastructure that would be exposed to these hazards. Proper engineering and required compliance with CBC and other City requirements would reduce the risk to life or property associated with liquefaction hazards. As discussed in Impact GEO-3, the City's review process would ensure that appropriate recommendations and mitigation measures are implemented and development that would be facilitated by the project would not exacerbate risks associated with seismic related ground failure, including liquefaction. This impact would be less than significant.

Conclusion

In light of the above discussion, the project would not facilitate development on a geologic unit or soil that is unstable, or that would become unstable as a result of development facilitated by the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, and this impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 4:	Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact GEO-7 THE PROJECT WOULD NOT FACILITATE DEVELOPMENT IN AREAS LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL DIRECT OR INDIRECT RISKS TO LIFE OR PROPERTY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.6.1, *Setting*, the city is underlain by soils with low shrink-swell potential and thus low potential for expansive soils (Natural Resources Conservation Service 2025). It is unlikely that development facilitated by the project would be subject to damage or instability from shrinks or swells of underlying soil. The adverse effects of expansive soils, if determined to be present through project-specific geotechnical investigation, would be avoided through proper subsoil preparation, drainage, and foundation design.

Pursuant to the CBC, development facilitated by the project would be subject to minimum standards for engineered subgrade and slab reinforcement to allow concrete slabs to better resist expansive soil conditions, and rain gutters, downspouts, rain leaders, splash blocks, and concrete landings would be required to direct rainwater away from foundations and slabs and minimize the potential for the underlying expansive soils to damage structures.

The City of Pacific Grove has low potential for expansive soils. Additionally, compliance with the requirements of the CBC, as well as relevant City policies and ordinances, would reduce risks related to expansive soils. Therefore, the proposed project would not create substantial direct or indirect risks to life or property due to expansive soils, and this impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 5:	Would the project 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?

Impact GEO-8 DEVELOPMENT FACILITATED BY THE PROJECT WOULD CONNECT TO MUNICIPAL WASTEWATER SERVICES AND WOULD NOT RELY ON SEPTIC SYSTEMS OR ON-SITE ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS. THERE WOULD BE NO IMPACT.

Development facilitated by the project would occur within developed areas served by existing sanitary sewer systems. As discussed in Section 4.16, *Utilities and Service Systems,* development would be required to connect to the City of Pacific Grove's existing sewer system, operated by

Monterey One Water. Therefore, development facilitated by the project would not require the use of septic tanks or alternative wastewater disposal systems, and no impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-9 DEVELOPMENT FACILITATED BY THE PROPOSED PLAN HAS THE POTENTIAL TO IMPACT PALEONTOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Consistent with SVP (2010) guidelines, the paleontological sensitivity of the geologic units underlying the project area are described below based on review of published geologic maps, a literature review, and online fossil locality databases. The age and paleontological sensitivity of these geologic units and the housing sites overlapping each geologic unit are summarized in Table 4.6-1. Note that some housing sites are underlain by multiple geologic units.

Table 4.6-1 Geologic Units Underlying Housing Sites

Geologic Unit	Paleontological Sensitivity	Housing Sites and Additional Parcels
Quaternary alluvium	Low	n/a
Quaternary dune sand	Low	n/a
Quaternary alluvial fan deposits	High	n/a
Quaternary older dune sand	Low	Sites 1, 2, 4-9, 38-41, 47-50, 53, 55, 56, 59-73, A1, A3, A4, A10, A11-A14
Quaternary marine terrace deposits	High	Sites 3, 6, 7, 10-19, 20-22, 24-28, 30-37, 42-46, 51, 52, 57, A2, A7, A9, A11
Granodiorite	None	Sites 9, 20, 21, 23, 29, 33, 35, 47, 50, 53, 54, 58, A5-A9, A11, A15
Quartz diorite	None	n/a

Specific impacts to paleontological resources can only be determined once a specific development project has been proposed because the impacts are highly dependent on both the individual site conditions and the characteristics of the proposed ground-disturbing activities. Ground-disturbing activities associated with construction facilitated by the project, particularly in areas that have not previously been developed with urban uses, have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in areas of high paleontological sensitivity. Even on previously developed sites, development facilitated by the project may significantly impact paleontological resources if construction affects previously undisturbed sediments (e.g., excavating deeper than previous development). If a future development project is underlain by a geologic unit with high paleontological sensitivity (Table 4.6-1) and the project impacts previously undisturbed sediments, then damage to or destruction of fossils could occur due to development facilitated by the project. Impacts would be potentially significant.

Mitigation Measures

GEO-9 Paleontological Resources Analysis

The City of Pacific Grove shall require the following specific requirements for projects that could disturb geologic units with high paleontological sensitivity (i.e., Quaternary alluvial fan deposits or Quaternary marine terrace deposits), including Sites 3, 6, 7, 10-19, 20-22, 24-28, 30-37, 42-46, 51, 52, 57, A2, A7, A9, and A11:

1. Prior to initial ground disturbance, the project applicant shall retain a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP 2010), to conduct a paleontological resources assessment (PRA), which may be part of a future project-specific environmental review document or a stand-alone report. The PRA shall determine the potential for the project to impact paleontologically sensitive sediments and the paleontological resources that may be contained therein. The PRA shall be reviewed by the City to ensure the project's compliance with this mitigation measure, SVP Guidelines, and MGMC Chapter 23.76.
2. If the PRA identifies no potential impacts to paleontological resources, then no further paleontological mitigation would be required. If the project could have a significant impact on paleontological resources, the PRA shall outline mitigation measures to reduce impacts by ensuring that all scientifically significant paleontological resources potentially encountered during construction are collected and preserved in a paleontological repository meeting SVP (2010) standards. These measures would be overseen by a Qualified Professional Paleontologist and may include, but would not be limited to: training of construction personnel, paleontological monitoring, and procedures for an unanticipated paleontological resource discovery.

If construction personnel training is required, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel.

Paleontological monitoring would be required for excavations, grading, trenching, or boring/drilling greater than 2 feet in diameter that occurs within previously undisturbed sediments with high paleontological sensitivity. Paleontological monitoring shall be conducted by an individual meeting the SVP (2010) definition of a Paleontological Resources Monitor. The Qualified Professional Paleontologist may recommend that monitoring be reduced in frequency or ceased entirely based on geologic observations. Such decisions shall be subject to review and approval by the City. Upon completion of ground-disturbing activities (or laboratory preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts. The report shall include a summary of the field and laboratory methods employed; an overview of project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City and, if fossil curation occurred, the designated scientific institution.

In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease, and the Qualified Professional Paleontologist shall evaluate the find. If the fossil(s) is (are) not scientifically significant, then construction activity may resume. If it is determined that the fossil(s) is (are) scientifically significant,

then they shall be salvaged, prepared to a curation-ready condition, and curated in a paleontological repository per SVP (2010) standards.

Significance After Mitigation

Mitigation Measure GEO-9 requires all development facilitated by the project over high paleontologically sensitive geologic units to undergo project-specific assessment, and, where potential for impacts are identified, to implement mitigation measures to reduced identified impacts, including training of construction personnel, paleontological monitoring, and procedures for an unanticipated paleontological resource discovery. With implementation of Mitigation Measure GEO-9, impacts to paleontological resources would be less than significant.

4.6.4 Cumulative Impacts

The geographic scope of the cumulative geology and soils analysis is the project area and the surrounding vicinity. Adverse effects associated with geology and soils impacts tend to be localized; therefore, an area generally within a 0.25-mile radius of the project area would be the area most affected by activities in combination with the project. In addition, adverse effects associated with paleontological resource impacts tend to be localized, because the integrity of the given resource depends on what occurs only in the immediate vicinity around that resource, such as disruption of soils. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Pacific Grove and surrounding areas in addition to the project.

Cumulative projects have the potential to experience strong to violent ground shaking and/or surface rupture from earthquakes. Cumulative projects would be required to adhere to the provisions of the CBC and policies of applicable general plans and municipal codes, reducing potential hazards associated with seismic ground shaking and ground failure. Therefore, cumulative impacts related to surface rupture (Threshold 1[a]) and seismic ground shaking (Threshold 1[b]) would be less than significant.

Soil hazards associated with cumulative projects, such as liquefaction and expansive soils, are specific to individual sites and generally do not contribute to a cumulative effect. Cumulative development would be subject to applicable General Plan policies, municipal code requirements, and CBC requirements related to reducing seismic and soil-related hazards such as liquefaction, lateral spreading, collapse, and expansive soils. Other current and future development or redevelopment projects in the region would similarly be required to adhere to standards and practices that include stringent geologic and soil-related hazard mitigations. Therefore, cumulative impacts related to liquefaction (Threshold 1[c]), lateral spreading, collapse (Threshold 3), and expansive soils (Threshold 4) would be less than significant.

The geographic scope for cumulative landslide impacts does not contain a landslide hazard zone. Landslide hazards associated with cumulative projects are specific to individual sites and generally do not contribute to a cumulative effect. Ground-disturbing activities associated with cumulative development would be subject to the applicable state and municipal code and CBC requirements to minimize the risk to life or property associated with landslides. Other current and future development/redevelopment projects in the region would similarly be required to adhere to standards and practices that include stringent geologic and soil-related hazard mitigations related to landslide prevention. Therefore, cumulative impacts related to landslides (Threshold 1[d]) would be less than significant.

Cumulative projects would subject to compliance with the NPDES Construction Stormwater General Permit, which requires the creation and implementation of a SWPPP and corresponding BMPs for projects greater than one acre in size to limit the potential for soil erosion. Cumulative development within the Coastal Zone would be subject to the erosion control measures listed in the applicable Local Coastal Program related to erosion minimization. Additionally, cumulative development would be subject to PGMC Chapter 9.30 BMPs to prevent substantial soil erosion and loss of topsoil. Thus, with regulatory compliance, cumulative impacts related to soil erosion and the loss of topsoil (Threshold 2) would be less than significant.

As described in Impact GEO-8, development facilitated by the project would not rely on septic systems or on-site alternative wastewater disposal systems and therefore the project would result in no impact related to soils incapable of supporting on-site wastewater systems. Accordingly, the project has no potential to contribute to cumulative impacts related to soils incapable of supporting on-site wastewater systems, and this impact is not discussed further (Threshold 5).

The potential for impacts to paleontological resources from individual developments is site-specific and depends on the location and extent of ground disturbance associated with each individual development proposal. Areas throughout the cumulative area would continue to develop and involve grading and excavation activities that could encounter paleontological resources. Cumulative development projects would continue to be subject to existing state and local requirements and projects may be subject to project-specific mitigation requirements under CEQA. Ground-disturbing activities have the potential to result in the destruction, damage, or loss of undiscovered scientifically important paleontological resources, particularly in areas of high paleontological sensitivity. Therefore, cumulative impacts to paleontological resources would be potentially significant. Development facilitated by the project on areas of high paleontological sensitivity would require implementation of Mitigation Measure GEO-9, which would minimize the potential for individual developments projects to cause a substantial adverse change in known or unknown paleontological resources. Therefore, the project would not have a considerable contribution to cumulative impacts related to the destruction, damage, or loss of undiscovered scientifically important paleontological resources (Threshold 6).

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4.7 Greenhouse Gas Emissions

The analysis in this section describes existing greenhouse gas (GHG) and climate trends and evaluates the potential GHG impacts of buildout under the proposed project, including GHG emissions that may have a significant impact on the environment and conflicts with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

4.7.1 Setting

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatonnes of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021).

a. GHG Emissions Inventory

Global Emissions Inventory

In 2015, worldwide anthropogenic GHG emissions totaled 47,000 million metric tons (MMT) of CO_2e, which is a 43 percent increase from 1990 GHG levels. Specifically, 34,522 MMT of CO_2e of CO_2, 8,241 MMT of CO_2e of CH_4, 2,997 MMT of CO_2e of N_2O, and 1,001 MMT of CO_2e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and use (includes fuels used by vehicles and buildings), which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and 6 percent, respectively. Waste sources contributed three percent. These sources account for approximately 96 percent (United States Environmental Protection Agency [USEPA] 2024a).

United States Emissions Inventory

U.S. GHG emissions were 6,341.2 MMT of CO_2e in 2022 or 5,487 MMT CO_2e after accounting for sequestration. Emissions decreased by 3.1 percent from 2021 to 2022. Between 2021 and 2022, the increase in total greenhouse gas emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion across most end-use sectors due in part to increased energy use from the continued rebound of economic activity after the height of the COVID-19 pandemic. In 2022, the energy sector (including transportation and industrial) accounted for 76.4 percent of nationwide GHG emissions while agriculture, commercial, and residential sections accounted for approximately 23.6 percent of nationwide GHG emissions (USEPA 2024b).

California Emissions Inventory

Based on California Air Resource Board's (CARB) California Greenhouse Gas Inventory for 2000-2022, California produced 371.1 MMT of CO_2e in 2022, which is 9.3 MMT of CO_2e lower than 2021 levels. The major source of GHG emissions in California is the transportation sector, which comprises 37.7 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 19.6 percent of the state's GHG emissions while electric power accounts for approximately 16.1 percent (CARB 2024). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, California achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO_2e. The annual 2030 statewide target emissions level is 260 MMT of CO_2e (CARB 2017).

b. Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. The year 2023 was the warmest year since global records began in 1885 at 1.18°C (2.12°F) above the 20th century average of 13.9°C (57.0°F). This value is 0.15°C (0.27°F) less than the record set in 2016. The 10 warmest years in the 174-year record have all occurred during the last decade (2014–2023) (National Oceanic and Atmospheric Administration 2024). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations jointly indicate that Land Surface Air Temperature and sea surface temperatures have

increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014, 2018).

Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years. *California's Fourth Climate Change Assessment* (California Natural Resource Agency [CNRA] 2019) includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state and regionally specific climate change case studies. However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary follows of some of the potential effects that climate change could generate in California.

Air Quality

Scientists project that the annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C (4.3°F to 5.8°F) in the next 50 years and by 3.1 to 4.9°C (5.6°F to 8.8°F) in the next century (CNRA 2019). Higher temperatures are conducive to air pollution formation, and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains (CNRA 2019). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. With increasing temperatures, shifting weather patterns, longer dry seasons, and more dry fuel loads, the frequency of large wildfires and area burned is expected to continue to increase (CNRA 2021).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). For example, the winter of 2022-2023 had severe storms and flooding from increased rainfall and snowmelt, which the California Department of Water Resources identified as "the latest example that California's climate is becoming more extreme" (California Department of Water Resources 2023). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western U.S., including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts (CNRA 2019). The Sierra Nevada Mountains snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the

dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack. Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (CNRA 2019).

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding (CNRA 2019). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding. The rate of increase of global mean sea levels between 1993 to 2022, observed by satellites, is approximately 3.4 millimeters per year, double the twentieth century trend of 1.6 millimeters per year (World Meteorological Organization 2013; National Aeronautics and Space Administration 2024). Global mean sea levels have risen 0.21- to 0.24 meter higher than those of 1880 (National Oceanic and Atmospheric Administration 2023). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise ranging between 0.25 to 1.01 meters by 2100 with the sea level ranges dependent on a low, intermediate, or high GHG emissions scenario (IPCC 2021). A rise in sea levels could erode 31 to 67 percent of southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (CNRA 2019). Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

In 2022, the market value of agricultural products sold in California totaled $59.0 billion, up $13.8 billion from 2017, that produces over a third of the country's vegetables and three-quarters of the country's fruits and nuts (California Department of Food and Agriculture 2024). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (CNRA 2019). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales. Soil moisture is likely to decline in many regions with higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006; CNRA 2019).

4.7.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

The U.S. Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) that USEPA has the authority to regulate motor vehicle GHG emissions under the federal Clean Air Act. USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, USEPA issued a Final Rule that established the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In *Utility Air Regulatory Group v. Environmental Protection Agency* (2014) 57 U.S. 302 , the U.S. Supreme Court held that USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source can be considered a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that Prevention of Significant Deterioration permits otherwise required based on emissions of other pollutants may continue to require limitations on GHG emissions based on the application of Best Available Control Technology.

In *West Virginia v. Environmental Protection* Agency (2022) 597 U.S. 697, the U.S. Supreme Court held that USEPA lacked the authority under Section 111(d) of the Clean Air Act to implement generation-shifting measures, such as those in the Clean Power Plan, without clear congressional authorization. The Court applied the "major questions doctrine," concluding that such significant regulatory actions require explicit direction from Congress. As a result, USEPA may not mandate a shift in electricity generation from higher-emitting sources like coal to lower-emitting sources such as natural gas or renewables as a means of controlling GHG emissions under this provision.

Federal Fuel Efficiency Standards

Under the Clean Air Act, corporate average fuel economy (CAFE) standards have been set for passenger cars and light trucks. The State of California has traditionally had a waiver to set its own more stringent fuel efficiency standards. However, on August 2, 2018, the National Highway Traffic Safety Administration and USEPA proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated into two parts as described below.

- Part One, “One National Program” (84 FR 51310) revoked a waiver granted by USEPA to the State of California under Section 209 of the CAA to enforce more stringent emission standards for motor vehicles than those required by USEPA for the explicit purpose of GHG reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, potentially restricting the ability of CARB to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California. The waiver was reissued in March 2022, and revoked again in May 2025.

- Part Two addresses CAFE standards for passenger cars and light trucks for model years 2021 to 2026. This rule proposed new CAFE standards for model years 2022 through 2026 and amended existing CAFE standards for model year 2021. The proposal retained the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026. The proposal addressing CAFE standards was jointly developed by National Highway Traffic Safety Administration and USEPA, with USEPA simultaneously proposing tailpipe CO_2 standards for the same vehicles covered by the same model years).

b. State Regulations

CARB is responsible for the coordination and oversight of state and local air pollution control programs in California. There are numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

California Advanced Clean Cars Program

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles, and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011). In October 2023, CARB launched a new effort to consider potential amendments to the Advanced Clean Cars II regulations, including updates to the tailpipe greenhouse gas emission standard and limited revisions to the LEV and Zero-emission Vehicle regulations. The Advanced Clean Cars II regulations will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035 all new passenger cars, trucks and SUVs sold in California will be zero emissions. The Advanced Clean Cars II regulations take the state's already growing zero-emission vehicle market and robust motor vehicle emission control rules and augments them to meet more aggressive tailpipe emissions standards and ramp up to 100% zero-emission vehicles (CARB 2025).

Executive Order S-3-05

In 2005, the governor issued Executive Order (EO) S-3-05, which identifies statewide GHG emission reduction targets to achieve long-term climate stabilization as follows:

- Reduce GHG emissions to 1990 levels by 2020
- Reduce GHG emissions to 80 percent below 1990 levels by 2050

In response to EO S-3-05, the California Environmental Protection Agency created the Climate Action Team, which in March 2006 published the Climate Action Team Report. The Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc.

California Global Warming Solutions Act (Assembly Bill 32 and Senate Bill 32)

The California Global Warming Solutions Act of 2006, or AB 32, outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO_2e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008). Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

CARB approved the 2013 Scoping Plan update in May 2014. The update defined CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of 6 MT of CO_2e by 2030 and 2 MT of CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

Assembly Bill 1279

AB 1279, The California Climate Crisis Act, was passed on September 16, 2022, and declares the state will achieve net zero GHG emissions as soon as possible, but no later than 2045, and will achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the state would reduce GHG emissions by 85 percent below 1990 levels no later than 2045.

In response to the passage of AB 1279 and the identification of the 2045 GHG reduction target, CARB published the Final 2022 Climate Change Scoping Plan in November 2022 (CARB 2022a). The 2022 Scoping Plan builds upon the framework established by the 2008 Climate Change Scoping Plan and previous updates while identifying new, technologically feasible, cost-effective, and equity-focused paths to achieve California's climate target. The 2022 Scoping Plan includes policies to achieve a significant reduction in fossil fuel combustion, further reductions in short-lived climate

pollutants, support for sustainable development, increased action on natural and working lands (NWL) to reduce emissions and sequester carbon, and the capture and storage of carbon.

The 2022 Update assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan; addresses recent legislation and direction from Governor Newsom; extends and expands upon these earlier plans; implements a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045; and takes an additional step of adding carbon neutrality as a science-based guide for California's climate work. As stated in the 2022 Scoping Plan, "The plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's NWL and using a variety of mechanical approaches" (CARB 2022a). Specifically, the 2022 Scoping Plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document
- Incorporates the contribution of NWL to the state's GHG emissions, as well as their role in achieving carbon neutrality
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture
- Evaluates the substantial health and economic benefits of taking action
- Identifies key implementation actions to ensure success

In addition to reducing emissions from transportation, energy, and industrial sectors, the 2022 Scoping Plan includes emissions and carbon sequestration in NWL and explores how NWL contribute to long-term climate goals. Under the Scoping Plan Scenario, California's 2030 emissions are anticipated to be 48 percent below 1990 levels, representing an acceleration of the current SB 32 target. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the accelerated 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet our GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology.

Senate Bill 375

The Sustainable Communities and Climate Protection Act (SB 375), signed in August 2008, enhances the state's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations are required to adopt a Sustainable Communities Strategy

(SCS), which allocates land uses in the Metropolitan Planning Organizations' Regional Transportation Plan. Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as "transit priority projects") can receive incentives to streamline California Environmental Quality Act processing.

On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Association of Monterey Bay Area Governments (AMBAG) was assigned targets of a three percent reduction in GHGs from per capita GHG emissions from passenger vehicles by 2020 and a six percent reduction in per capita GHG emissions from passenger vehicles by 2035. The AMBAG adopted 2045 Metropolitan Transportation Plan & Sustainable Communities Strategy (MTP/SCS) in June 2022, which meets the requirements of SB 375.

California Integrated Waste Management Act (Assembly Bill 341)

The California Integrated Waste Management Act of 1989, as modified by AB 341 in 2011, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities and (2) diversion of 50 percent of all solid waste on and after January 1, 2000.

Senate Bill 1383

Adopted in September 2016, SB 1383 (Lara, Chapter 395, Statutes of 2016) requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. SB 1383 requires the strategy to achieve the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

SB 1383 also requires the California Department of Resources Recycling and Recovery, in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Senate Bill 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the state's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. The project area's main electricity provider is Central Coast Community Energy, which provides renewable electricity via Pacific Gas and Electric Company electricity transmission lines. The Central Coast Community Energy offers several energy choice options to its customers. The default service,3Cchoice, supports clean and renewable energy, community investment, and provides access to various rebates and incentives. Customers can also opt up to 3Cprime, which ensures 100 percent renewable energy from solar and wind sources (Central Coast Community Energy 2025).

Executive Order B-55-18

On September 10, 2018, the former Governor Brown issued EO B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Building Standards Code

The California Code of Regulations Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2022 Title 24 standards. The California Building Standards Code's energy-efficiency and green building standards are outlined below.

Part 6 – Building Energy Efficiency Standards/Energy Code

The California Code of Regulations Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The 2022 Title 24 standards are the applicable building energy efficiency standards for the proposed project because they became effective on January 1, 2023.

Part 11 – California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective on January 1, 2011 (as part of the 2010 California Building Standards Code). The 2022 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

The mandatory standards applicable to air quality require:

- Minimum 20 percent reduction in indoor water use relative to specified baseline levels;[1]
- Waste Reduction:
  - Minimum 65 percent non-hazardous construction/demolition waste diverted from landfills;
  - Non-residential and multi-family dwellings with five or more units: Provide readily accessible areas identified for the depositing, storage and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastic, organic waste, and metals; and/or

[1] Similar to the compliance reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

  - Non-residential: Reuse and/or recycling of 100 percent of trees, stumps, rocks, and associated vegetation soils resulting from primary land clearing;

- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards; and
- Electric Vehicle (EV) Charging for New Construction:[2]
  - Multi-family dwellings and hotels/motels with less than 20 units/rooms: Designation of at least 10 percent of the total number of parking spaces shall be EV capable and at least 25 percent of the total number of parking spaces shall be EV-ready;
  - Multi-family dwellings and hotels/motels with greater than 20 units/rooms: Designation of at least 10 percent of the total number of parking spaces shall be EV capable, at least 25 percent of the total number of parking spaces shall be EV-ready, and at least 5 percent of the total number of parking spaces shall be equipped with a Level 2 charging station;
  - Non-residential land uses shall comply with the following EV charging requirements based on the number of passenger vehicle parking spaces:
    - 0-9: no EV capable spaces or charging stations required;
    - 10-25: 4 EV capable spaces but no charging stations required;
    - 26-50: 8 EV capable spaces of which 2 must be equipped with charging stations;
    - 51-75: 13 EV capable spaces of which 3 must be equipped with charging stations;
    - 76-100: 17 EV capable spaces of which 4 must be equipped with charging stations;
    - 101-150: 25 EV capable spaces of which 6 must be equipped with charging stations;
    - 151-200: 35 EV capable spaces of which 9 must be equipped with charging stations; and
    - More than 200: 20 percent of the total available parking spaces of which 25 percent must be equipped with charging stations;
  - Non-residential land uses shall comply with the following EV charging requirements for medium- and heavy-duty vehicles: warehouses, grocery stores, and retail stores with planned off-street loading spaces shall install EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s), or subpanel(s) at the time of construction based on the number of off-street loading spaces as indicated in Table 5.106.5.4.1 of the California Green Building Standards;
- Bicycle Parking:
  - Non-residential short-term bicycle parking for projects anticipated to generate visitor traffic: permanently anchored bicycle racks within 200 feet of visitor entrance for 5 percent of new visitor motorized vehicle parking spaces with a minimum of one 2-bike capacity rack; and/or
  - Non-residential buildings with tenant spaces of 10 or more employees/tenant-occupants: secure bicycle parking for 5 percent of the employee/tenant-occupant vehicle parking spaces with a minimum of one bicycle parking facility.

[2] EV Capable = a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways to support EV charging; EV-ready = a vehicle space which is provided with a branch circuit and any necessary raceways to accommodate EV charging stations, including a receptacle for future installation of a charger (see 2022 California Green Building Standard Code, Title 24 Part 11 for full explanation of mandatory measures, including exceptions).

- Shade Trees (Non-Residential):
  - Surface parking: minimum No. 10 container size or equal shall be installed to provide shade over 50 percent of the parking within 15 years (unless parking area covered by appropriate shade structures and/or solar);
  - Landscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years; and/or
  - Hardscape areas: minimum No. 10 container size or equal shall be installed to provide shade of 20 percent of the landscape area within 15 years (unless covered by applicable shade structures and/or solar or the marked area is for organized sports activities).

The voluntary standards include:

- Deconstruct existing buildings and reuse applicable salvaged materials;
- Residential – Cool Roofs: have a thermal mass over the roof membrane, including green roofs weighing a minimum of 25 pounds per square foot or roof areas covered by solar photovoltaic panels and building integrated solar thermal panels;
- Residential – Reduce nonroof heat island for 50 percent of sidewalks, patios, driveways or other paved areas;
- Residential Bicycle Parking:
  - Multi-family/hotel/motel short-term parking: provide permanently anchored bicycle racks within 100 feet of visitor's entrance for 5 percent of visitor motorized vehicle parking capacity (minimum one 2-bike capacity rack);
  - Multi-family buildings long-term parking: provide acceptable on-site bicycle parking for at least one bicycle per every two dwelling units; and/or
  - Hotel/motel long-term parking: provide one acceptable on-site bicycle parking space for every 25,000 square feet but not less than two spaces;

- Tier I:
  - Stricter energy efficiency requirements;
  - Stricter water conservation requirements for specific fixtures;
  - minimum 65 percent reduction in construction waste with third-party verification, Minimum 10 percent recycled content for building materials;
  - Minimum 20 percent permeable paving;
  - Minimum 20 percent cement reduction;
  - Multi-family developments/hotels/motels: minimum 35 percent of total parking spaces shall be EV ready and for projects with 20 or more dwelling units/rooms a minimum of 10 percent of the total number of parking spaces shall be equipped with EV charging stations.

- Tier II:
  - Stricter energy efficiency requirements,
  - Stricter water conservation requirements for specific fixtures;
  - Minimum 75 percent reduction in construction waste with third-party verification,
  - Minimum 15 percent recycled content for building materials;
  - Minimum 30 percent permeable paving;

- Minimum 25 percent cement reduction; and/or
- Multi-family developments/hotels/motels: minimum 40 percent of total parking spaces shall be EV ready and for projects with 20 or more dwelling units/rooms, a minimum of 15 percent of the total number of parking spaces shall be equipped with EV charging stations.
- Non-residential land uses shall comply with the following EV charging requirements based on the number of passenger vehicle parking spaces:
  - 0-9: 3 EV capable spaces but no charging stations required;
  - 10-25: 8 EV capable spaces of which 3 much be equipped with charging stations;
  - 26-50: 17 EV capable spaces of which 6 must be equipped with charging stations;
  - 51-75: 28 EV capable spaces of which 9 must be equipped with charging stations;
  - 76-100: 40 EV capable spaces of which 13 must be equipped with charging stations;
  - 101-150: 57 EV capable spaces of which 19 must be equipped with charging stations;
  - 151-200: 79 EV capable spaces of which 26 must be equipped with charging stations; and
  - More than 200: 45 percent of the total available parking spaces of which 33 percent must be equipped with charging stations;

Executive Order N-79-20

On September 23, 2020, Governor Newsom issued EO N-79-20, which established the following new statewide goals:

- All new passenger cars and trucks sold in-state to be zero-emission by 2035
- All medium- and heavy-duty vehicles in the state to be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks
- All off-road vehicles and equipment to be zero-emission by 2035 where feasible

EO N-79-20 directs CARB, the Governor's Office of Business and Economic Development, the CEC, the California Department of Transportation, and other state agencies to take steps toward drafting regulations and strategies and leveraging agency resources toward achieving these goals.

Clean Energy, Jobs, and Affordability Act (Senate Bill 1020)

Adopted on September 16, 2022, SB 1020 creates clean electricity targets for eligible renewable energy resources and zero-carbon resources to supply 90 percent of retail sale electricity by 2035, 95 percent by 2040, 100 percent by 2045, and 100 percent of electricity procured to serve all state agencies by 2035. This bill shall not increase carbon emissions elsewhere in the western grid and shall not allow resource shuffling.

c. Regional and Local Regulations

Association of Monterey Bay Area Governments

As the metropolitan planning organization for the Monterey Bay area, AMBAG is required to produce certain documents that maintain the region's eligibility for federal transportation assistance which include the MTP. AMBAG coordinates the development of the MTP with Regional Transportation Planning Agencies (San Benito County Council of Governments, Santa Cruz County

Regional Transportation Commission, and Transportation Agency for Monterey County), transit providers (San Benito County Local Transit Authority, Monterey Salinas Transit, and Santa Cruz METRO Transit District), MBARD, state and federal governments, and organizations having interest in or responsibility for transportation planning and programming. AMBAG also coordinates transportation planning and programming activities with the three counties and 18 local jurisdictions within the tri-county Monterey Bay Region.

In June 2022, AMBAG adopted the 2045 MTP/SCS. The 2045 MTP/SCS is built on a set of integrated policies, strategies, and investments to maintain and improve the transportation system to meet the diverse needs of the region through 2045. The 2045 MTP/SCS plans more focused growth in high quality transit corridors and more travel choices as well as a safe and efficient transportation system with improved access to jobs and education. The AMBAG region strives toward sustainability through integrated land use and transportation planning. The AMBAG region must achieve specific federal air quality standards and is required by state law to lower regional GHG emissions. AMBAG was tasked by CARB to achieve a six percent decrease in mobile source GHG emissions compared to 2005 vehicle emissions by the end of 2035. Implementation of the 2045 MTP/SCS is anticipated to achieve a four percent per capita reduction by 2020 and a nearly seven percent per capita reduction by 2035 (AMBAG 2022).

City of Pacific Grove General Plan

The City of Pacific Grove General Plan was adopted in 1994 and serves as the principal policy document for guiding the city's future conservation and development efforts. The General Plan's Transportation and Housing Element (City of Pacific Grove 1994) includes the following goals and policies pertaining to GHG emissions that are relevant to this analysis:

Goal T-4. Limit the increase in auto use through Transportation System Management. Increase transit ridership, carpooling, vanpooling, walking, and bicycling**.**

- **Policy 9.** Encourage visitor use of public transit, private tour buses, bicycling, or walking.
- **Policy 10.** Encourage design for new and expanded development that facilitates access by transit, walking, bicycles, and carpools.

Goal T-7. Promote pedestrian and bicycle travel as alternatives to automobile use**.**

- **Policy 25.** Create and maintain a safe and convenient system of pedestrian and bicycle pathways throughout the city.

Goal HS 6. Ensure resource efficiency in new and existing housing units.

- **Policy 6.2.** Encourage energy and resource efficiency in the design of all new residential developments, to the extent practical.

4.7.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

GHG emissions from the buildout of the proposed project were estimated using traffic modeling based on regional and project-area vehicle trips. While emissions from businesses or individual operations in the project area and region contribute to global GHG emissions, this DEIR only

includes emissions that may change under project implementation compared to existing conditions. Emissions not directly resulting from the project buildout are outside the scope of this CEQA analysis, as analyzing impacts not directly related to the project would be speculative.

The California Emissions Estimator Model (CalEEMod) version 2022.1 was used to estimate GHG emissions associated with the project. The analysis focuses on CO_2, CH_4, and N_2O because these make up 98 percent of all GHG emissions by volume (IPCC) and are the GHG emissions that the project would emit in the largest quantities. Emissions of all GHGs are converted into their equivalent weight in CO_2 (CO_2e).

Construction Emissions

Construction of projects carried out under the proposed project are assumed to take place over approximately eight years, as detailed in Section 4.2, *Air Quality.* During construction, these projects would generate GHG emissions primarily from the use of internal combustion engines to power on-site equipment as well as off-site transportation of workers and materials. Further details on the assumptions included in the modeling of GHG emissions are provided in Section 4.2, *Air Quality*. Emissions were based on the growth anticipated under the proposed project which, as described in Table 2-11 of Chapter 2, *Project Description*, consist of up to 2,335 residential units and 292,578 square feet of commercial uses. Construction emissions were based on average fleet emissions in 2025; they therefore represent a conservative estimate of construction emissions that would occur over the proposed project buildout, as construction equipment is anticipated to become more efficient over time. The proposed project's GHG construction emissions are amortized for the lifetime of the project, which is 30 years based on the Association of Environmental Professionals guidance (Association of Environmental Professionals 2016).

Operational Emissions

Operational GHG emissions would be emitted by sources such as energy, area, mobile, solid waste, water and wastewater, and refrigerants. CalEEMod calculates operational emissions from energy use, including electricity and natural gas use, based on the CEC-sponsored California Commercial End Use Survey for residential and commercial land uses. CalEEMod version 2022.1 incorporates California's 2019 Title 24 building energy efficiency standards. Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating are calculated based on standard emission rates from CARB, USEPA, and district-supplied emission factor values. Emissions from waste generation are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste. Waste disposal rates by land use and overall composition of municipal solid waste in California are primarily based on data provided by California Department of Resources Recycling and Recovery. Emissions from water and wastewater usage calculated in CalEEMod are based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California (California Air Pollution Control Officers Association 2022). Emissions from mobile sources for the project were also quantified using emission factors and fleet mix from the 2021 EMission FACtor model. Details for mobile source inputs included in the modeling of GHG emissions are provided in Section 4.2, *Air Quality.*

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on GHG emissions if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Most individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]). Pursuant to *CEQA Guidelines* Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with a previously approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. Therefore, *CEQA Guidelines* Section 15064(h)(3) allows a lead agency to make a finding of less than significant impact for GHG emissions if a project complies with adopted plans, programs, policies, and/or other regulatory strategies to reduce GHG emissions.

Section 15064.4 of the *CEQA Guidelines* recommends that lead agencies quantify the GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association, as long as any threshold is supported by substantial evidence (see *CEQA Guidelines* Section 15064.7(c). No agency that has jurisdiction over the project area has adopted a numerical significance threshold for assessing impacts related to GHG emissions. Neither MBARD, the Governor's Office of Land Use and Climate Innovation, CARB, the California Air Pollution Control Officers Association, nor any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the proposed project.

In the absence of any adopted or accepted numeric threshold, the significance of the proposed project's GHG emissions are evaluated consistent with *CEQA Guidelines* Section 15064.4(b) and *CEQA Guidelines* Section 15064(h)(3) by considering whether the proposed project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Therefore, the significance of the proposed project's potential impacts regarding GHG emissions and climate change is evaluated based on the project's consistency with applicable plans, policies, regulations and requirements related to GHG emissions. For this project, as a land use development project, the most applicable adopted regulatory plans to reduce GHG emissions is the 2022 Scoping Plan.

The 2022 Scoping Plan builds on previous initiatives by incorporating the AB 1279 targets, aiming to achieve net zero greenhouse gas emissions no later than 2045 and reduce GHG emissions by 85 percent below 1990 levels no later than 2045. The 2022 Scoping Plan includes Appendix D, Local Actions, that outlines project-specific measures that can be implemented so that a project is consistent with the Scoping Plan (CARB 2022b). These measures, referred to as "Key Project Attributes," emphasize three priority areas: transportation electrification, VMT reduction, and building decarbonization. Table 4.7-1 lists the key project attributes as they are presented in Appendix D of the 2022 Scoping Plan.

Table 4.7-1 2022 Scoping Plan Key Residential and Mixed-Use Project Attributes that Reduce GHGs

Priority Areas	Key Project Attribute
Transportation Electrification	▪ Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.
VMT Reduction	▪ Is located on an infill site that is surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer). ▪ Does not result in the loss or conversion of natural and working lands. ▪ Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre); or is in proximity to existing transit stops (within a half mile); or satisfies more detailed and stringent criteria specified in the region's SCS. ▪ Reduces parking requirements by: eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or providing residential parking supply at a ratio of less than one parking space per dwelling unit; or for multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit. ▪ At least 20 percent of units included are affordable to lower-income residents. ▪ Results in no net loss of existing affordable units.
Building Decarbonization	▪ Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.

Source: CARB 2022b

Projects that incorporate all of these key project attributes would align with the state's priority GHG reduction strategies for local climate action. Therefore, the GHG emissions associated with such projects may result in a less than significant GHG impact (CARB 2022b). The GHG emissions from the operation of the proposed project are provided for informational purposes.

b. Project Impact and Mitigation Measures

Threshold 1:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
Threshold 2:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-1 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD GENERATE GHG EMISSIONS, AND THE PROJECT WOULD INCORPORATE FEATURES THAT ALIGN WITH THE GOALS OF THE APPLICABLE PLANS, POLICIES, AND REGULATIONS RELATED TO THE REDUCTION OF GHG EMISSIONS. HOWEVER, EVEN WITH THE IMPLEMENTATION OF MITIGATION MEASURE GHG-1, INDIVIDUAL PROJECTS COULD FACE CHALLENGES THAT HINDER THEIR ABILITY TO IMPLEMENT MITIGATION MEASURE GHG-1 AND THUS NOT BE CONSISTENT WITH THE 2022 SCOPING PLAN. THEREFORE, IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As discussed under Section 4.7.3 (a), *Methodology and Significance Thresholds*, plans and policies have been adopted to reduce GHG emissions in the project region, including the state's 2022 Scoping Plan and AMBAG 2045 MTP/SCS. The proposed project's consistency with these plans and applicable policies is discussed in the following subsections. Estimated GHG emissions for development expected to be carried out under the proposed project are provided for informational purposes following the consistency analysis.

2022 Scoping Plan

The principal state GHG reduction plans and policies are AB 32, the California Global Warming Solutions Act of 2006, and the subsequent legislation, SB 32 and AB 1279. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the state passed AB 1279, which declares the state would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on three priority areas: transportation electrification, VMT reduction, and building decarbonization. Table 4.7-2 below describes the project's consistency with the key project attributes associated with the three priority areas identified in the 2022 Scoping Plan.

Table 4.7-2 Project Consistency with the 2022 Scoping Plan

Key Project Attribute	Consistency
Transportation Electrification ▪ Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	**Potentially Inconsistent.** For multi-family residential housing, CALGreen's most stringent voluntary standard is the Tier 2 measure, which requires 40 percent of total parking spaces to be equipped with EV-ready infrastructure for projects with fewer than 20 dwelling units. For projects with more than 20 dwelling units, 15 percent of total parking spaces must have Level 2 EV charging stations. Additionally, the Tier 2 requirements for EV ready infrastructure and charging station for non-residential land uses, based on the number of parking spaces, are shown in Section 4.7.2(b), State Regulations, under the California Building Code Standards. The proposed Housing Element Update and associated Zoning and General Plan Amendments do not include EV charging requirements. Therefore, it is unknown if future development facilitated by the project would incorporate EV infrastructure, and consequently, it is unknown if future development would be consistent with this key project attribute of the 2022 Scoping Plan.

Key Project Attribute	Consistency
VMT Reduction ▪ Is located on an infill site that is surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer). ▪ Does not result in the loss or conversion of natural and working lands. ▪ Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre); or is in proximity to existing transit stops (within a half mile); or satisfies more detailed and stringent criteria specified in the region's SCS. ▪ Reduces parking requirements by: eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or providing residential parking supply at a ratio of less than one parking space per dwelling unit; or for multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit. ▪ At least 20 percent of units included are affordable to lower-income residents. ▪ Results in no net loss of existing affordable units.	**Consistent.** As discussed in Section 4.14, Transportation, the project would result in an estimated average of 14.1 VMT per capita and 18.6 VMT per employee, which would be below the thresholds of 14.3 VMT per capita and 18.9 VMT per employee, respectively. The proposed project would focus development on infill sites surrounded by existing urban uses and redeveloped on underutilized land, which is already served by existing utilities and essential public services such as transit, streets, water, and sewer. The project would increase residential density by updating the zoning, ensuring transit-supportive densities with a minimum of 20 residential dwelling units per acre. Additionally, the housing sites at the Downtown District, Forest Hill Commercial District, Presidio-Austin Commercial District, and Central-Eardley Commercial District are near the Monterey-Salinas Transit line, Route 1 and Route 2 and would provide connectivity to existing neighborhoods and commercial land uses. Furthermore, as discussed in Chapter 2, Project Description, the project would meet the at least 20 percent of the units are affordable to lower-income residents, with no net loss of existing affordable units. Therefore, the project would not conflict with the 2022 Scoping Plan's VMT reduction priority area.
Building Decarbonization	**Potentially Inconsistent.** Development facilitated by the proposed project would comply with the latest Title 24 Green Building Code and Building Efficiency Energy Standards. Additionally, projects would be constructed to include photovoltaic systems consistent with the provisions in the latest Title 24, Building Energy Efficiency Standards for Residential and Nonresidential Buildings. In addition, future development facilitated by the project would receive electricity from 3CE, which is required to reduce GHG emissions by increasing procurement from eligible renewable energy by set target years as required by SB 100. However, the proposed Housing Element Update and associated Zoning and General Plan Amendments do not include policies for installing all-electric appliances in the proposed buildout. Therefore, it is uncertain whether development facilitated by the proposed project would incorporate all-electric appliances, and if future development would be consistent with this key project attribute of the 2022 Scoping Plan.

According to the 2022 Scoping Plan, residential and mixed-use development projects that incorporate all key project attributes align with the state's priority GHG reduction strategies for local climate action and with the state's climate and housing goals. Although the project would achieve some Scoping Plan key project attributes, such as VMT reduction, no loss or conversion of natural and working lands, and affordable housing, the development facilitated by the project may not include the installation of EV chargers and may use natural gas as an energy source. As a result, the project would potentially conflict with the Building Electrification and Building Decarbonization key project attributes identified in the 2022 Scoping Plan, thereby conflicting with the most applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, this impact would be potentially significant.

Association of Monterey Bay Area Governments 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy

AMBAG adopted an updated MTP/SCS, *Moving Forward Monterey Bay 2045*, in June 2022. The 2045 MTP/SCS is reflective of legislation SB 375 described in Section 4.7.2 (C), *Regional and Local Regulations,* above to focus land use development around high-quality transit corridors as a means to reduce passenger vehicle GHG emissions. Table 4.7-3 below describes the project's consistency with the MTP/SCS six central goals.

Table 4.7-3 Project Consistency with the Association of Monterey Bay Area Governments 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy

Policy	Consistency
Access and Mobility. Provide convenient, accessible, and reliable travel options while maximizing productivity for all people and goods in the region	**Consistent.** The project would focus development on infill sites near existing residential and commercial areas, enhancing connectivity to these land uses. Additionally, the housing sites in the Downtown District, Forest Hill Commercial District, Presidio-Austin Commercial District, and Central-Eardley Commercial District would have access to the Monterey-Salinas Transit lines, Route 1 and Route 2, further connecting them to existing neighborhoods and commercial areas. Therefore, the project would have accessible and reliable travel options and be designed to reduce reliance on solo vehicle trips. The project would facilitate the use of accessible and reliable travel options and would be consistent with this policy.
Environment. Promote environmental sustainability and protect the natural environment.	**Consistent.** Future development under the project would include several sustainable design features, including those required by Title 24 and CALGreen standards such as solar ready or PV systems installed on eligible residences. Additionally, future development under the project would incorporate water-efficient appliances, fixtures, and irrigation systems in accordance with the 2022 CALGreen standards, including low-flow toilets, showerheads, and faucets. The project would meet the requirements of the 2022 California Energy Code. Therefore, in terms of sustainability, the project would promote environmental sustainability and would be consistent with this policy.
Healthy Communities. Protect the health of our residents; foster efficient development patterns that optimize travel, housing, and employment choices and encourage active transportation.	**Consistent.** The proposed project would focus development on infill sites and underutilized land near existing residential and commercial areas. Additionally, it would promote mixed-residential buildings to optimize housing and employment opportunities. Furthermore, the project would encourage alternative transportation such as walking, bicycling, and transit by enhancing connectivity to nearby residential and commercial zones and transit hubs. Therefore, the project would foster efficient development patterns and encourage active transportation, and would be consistent with this policy.

Source: AMBAG 2022

As shown above, the project would be consistent with AMBAG 2045 MTP/SCS policies. The project would facilitate the use of alternative travel options, incorporate sustainable design features, and foster efficient development patterns. Impacts related to consistency with the AMBAG 2045 MTP/SCS would be less than significant.

Mitigation Measures

GHG-1 Greenhouse Gas Emissions Reductions

Development facilitated by the proposed project shall incorporate GHG emissions reduction actions to demonstrate consistency with the 2022 Scoping Plan for residential and mixed-use developments. Specifically, individual projects shall incorporate the following actions, which shall be verified by the City prior to issuing a building permit for an individual project:

a. Future mixed use residential and commercial developments shall be designed to support all-electric buildings and electric appliances. Natural gas connections and activation shall be permitted when alternative renewable energy sources are demonstrably infeasible for a permitted use. Compliance shall be verified by City staff on building plans prior to granting building permits.
b. Provide EV charging infrastructure that, at minimum, meets California Green Building Standards Code Tier 2 voluntary measures at the time of project approval.

Significance After Mitigation

Mitigation Measure GHG-1 would ensure that individual projects facilitated by the proposed project incorporate all-electric building design and EV charging infrastructure consistent with the 2022 Scoping Plan. While most individual projects would be able to incorporate these measures, some challenges, such as building constraints, could hinder the implementation of all-electric building design and appliances or development of EV charging infrastructure consistent with the 2022 Scoping Plan. Revisions to the Building Code may be required to fully implement and enforce all-electric building requirements. In addition, the Ninth Circuit Court of Appeals, in *California Restaurant Association v. City of* Berkeley (2024) 89 F.4th 1094 limited a jurisdiction's ability to prohibit natural gas hook-ups for new development. Though there is no legal constraint to encouraging all electric development and design through policy and building code requirements, there may be some instances where mandatory electric building features are infeasible. Because all-electric building design cannot be guaranteed, the project would continue to be inconsistent with the 2022 Scoping Plan and impacts would be significant and unavoidable.

GHG Emissions for Informational Purposes

Development facilitated by the proposed project would generate GHG emissions through construction as well as operational activities. As mentioned in Section 4.7.3 (a), *Methodology and Significance Thresholds*, there is no adopted numerical threshold applicable to the project area; therefore, quantified GHG emissions are provided for informational purposes only. Construction of projects carried out under the proposed project would generate temporary GHG emissions primarily from the usage of construction equipment as well as from vehicles transporting construction workers to and from project sites and heavy trucks to transport building materials. As shown in Table 4.7-4, construction of the proposed project would generate an estimated total of 358 MT CO_2e per year, amortized over 30 years.

Table 4.7-4 Construction GHG Emissions

Land Use	Annual Emissions (MT CO_2e)
Project Construction	10,746
Amortized (over 30 years)	**358**

Source: Appendix F

Operation of new development carried out under the proposed project would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips, wastewater, solid waste generation, and refrigerant. As shown in Table 4.7-5, when combined with amortized construction emissions, project buildout by 2031 would result in an estimated net 10,714 MT of CO_2e per year.

Table 4.7-5 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT of CO_2e/year)
Construction	
Amortized over 30 years	**358**
Operational	**10,356**
Mobile	5,971
Area	46
Energy	3,236
Water	212
Waste	951
Refrigerant	3
Total Emissions	**10,714**

MT CO_2e = metric tons of carbon dioxide equivalent

Source: Appendix F for CalEEMod outputs

4.7.4 Cumulative Impacts

GHG emissions and climate change are, by definition, cumulative impacts. Although GHG emissions have worldwide repercussions, the contribution of the project to cumulative impacts is addressed in light of the goals for reducing statewide emissions. Therefore, the geographic scope for considering cumulative impacts related to GHG emissions is the State of California.

Statewide GHG emissions are an existing significant cumulative impact. As such, the state has established the following statewide emissions reductions targets:

- By 2020, reduce GHG emissions to 1990 levels
- By 2030, reduce GHG emissions to 40 percent below 1990 levels
- By 2045, to achieve carbon neutrality

GHG impacts are assessed in a cumulative context since no single project can cause a discernible change to the climate. Therefore, cumulative significance is based on the same thresholds as the proposed project. In the absence of any adopted numeric threshold for the project area, the significance of the project's GHG emissions is evaluated consistent with *CEQA Guidelines* Section 15064.4(b) by considering whether the project complies with applicable plans, policies, regulations,

and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The analysis provided GHG emissions for informational purposes. For this project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the 2022 Scoping Plan and the 2045 MTP/SCS.

As discussed under Impact GHG-1, the proposed project would install photovoltaic systems consistent with the provisions for mix-use residential and buildings and energy conservation standards of Title 24 Building Energy Efficiency Standards (Part 6) and Green Building Standards (Part 11). In addition, the project would meet the requirements of the 2022 CALGreen Standards and incorporate water efficient appliances and fixtures. The project would focus development on infill sites close to existing residential and commercial areas, thereby improving connectivity to these land uses. Furthermore, the housing sites would be accessible via the Monterey-Salinas Transit lines, specifically Route 1 and Route 2. Therefore, the project would promote alternative modes of transportation that would have the effect of reducing VMT and associated mobile GHG emissions. By incorporating Mitigation Measure GHG-1, individual project would include all-electric building design to support use of all electric appliances and EV charging infrastructure that meets the most ambitious voluntary standard in the California Green Building Standards Code for mixed use residential and development. However, building constraints could hinder the implementation for some individual projects, resulting in significant GHG emissions. Further, the Ninth Circuit Court of Appeals, in *California Restaurant Association v. City of* Berkeley (2024) 89 F.4th 1094 limited a jurisdiction's ability to prohibit natural gas hook-ups for new development. Though there is no legal constraint to encouraging all electric development and design through policy and building code requirements, there may be some instances where mandatory electric building features are infeasible. Therefore, the proposed project would not be consistent with the Transportation Electrification and Building Decarbonization key project attributes identified in the 2022 Scoping Plan. Thus, based on the *CEQA Guidelines* for determining the significance of GHG emissions, the proposed project's contribution would be considerable.

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4.8 Hazards and Hazardous Materials

This section evaluates the potential impacts relating to hazards and hazardous materials impacts associated with implementation of the project.

4.8.1 Setting

a. Hazardous Materials

The term "hazardous materials" has different definitions for different regulatory programs. For the purpose of this DEIR, the term "hazardous materials" refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(n)(1) defines a hazardous material as any material that "because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity. These general types of hazardous materials are more specifically defined below:

- **Toxic Substances.** Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or even death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substances involved and is chemical-specific). Carcinogens, substances that can cause cancer, are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- **Corrosive Materials.** Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage. Before the 1980s, most land disposal of chemicals was unregulated, resulting in numerous industrial properties and public landfills becoming dumping grounds for unwanted chemicals. The largest and most contaminated of these sites became Superfund sites, so named for their eligibility to receive cleanup money from a federal fund established under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The National Priorities List is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The National Priorities List is

intended primarily to guide the United States Environmental Protection Agency (USEPA) in determining which sites warrant further investigation. Sites are added to the National Priorities List following a hazard ranking system.

Numerous smaller properties have been designated as contaminated sites. Often these are gas station sites where leaking underground storage tanks (UST) were upgraded under a federal requirement in the late 1980s. Another category of sites that may have some overlap with the types already mentioned is "brownfields" – previously used, often abandoned, sites that due to actual or suspected contamination are undeveloped or underused. Both USEPA and California Department of Toxic Substances Control (DTSC) maintain lists of known brownfields sites. These sites are often difficult to inventory due to their owners' reluctance to publicly label their property as potentially contaminated.

Asbestos-Containing Materials

Asbestos is a naturally occurring fibrous material that was widely used in structures built between 1945 and 1978 for its fireproofing and insulating properties. Asbestos-containing materials (ACM) were banned by USEPA between the early 1970s and 1991 under the authority of the Clean Air Act and the Toxic Substances Control Act due to their harmful health effects. Exposure to asbestos increases risk of developing lung disease, such as lung cancer, mesothelioma, or asbestosis (USEPA 2023). Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Pre-1973 structures are affected by asbestos regulations if damage occurs, or if remodeling, renovation, or demolition activities disturb ACMs.

Lead and Lead-Based Paint

Lead is a naturally occurring metallic element. Because of its toxic properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because it is easily absorbed into developing systems and organs. Lead can affect almost every organ and system in the body. In children, lead can cause behavior and learning problems, lower IQ and hyperactivity, hearing problems, and anemia. In adults, lead can cause cardiovascular effects, decreased kidney function, and reproductive problems. In addition, lead can result in serious effects to the developing fetus and infant for pregnant women (USEPA 2024a). Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils surrounding buildings and structures that are painted with lead-based paint (LBP). LBP was primarily used during the same time period as ACMs. Pre-1978 structures are affected by LBP regulations if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces.

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) belong to a broad family of man-made organic chemicals known as chlorinated hydrocarbons. PCBs were domestically manufactured from 1929 until manufacturing was banned in 1979. They have a range of toxicity and vary in consistency from thin, light-colored liquids to yellow or black waxy solids. Due to their non-flammability, chemical stability, high boiling point and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications.

b. Existing Conditions

Hazardous Materials Sites

The locations where hazardous materials are used, stored, treated, and/or disposed of come to the attention of regulatory agencies through various means, including licensing and permitting, enforcement actions, and anonymous tips. To the extent possible, the locations of these businesses and operations are recorded in database lists maintained by various federal, state, and local regulatory agencies. In addition, federal, state, and local agencies enforce regulations applicable to hazardous waste generators and users, and the Monterey County Environmental Health Bureau tracks and inspects hazardous materials handlers in Monterey County to ensure appropriate reporting and compliance.

Permitted uses of hazardous materials include those facilities that use hazardous materials or handle hazardous wastes in accordance with current hazardous materials and hazardous waste regulations. The use and handling of hazardous materials from these sites is considered low risk, although there can be instances of unintentional chemical releases. In such cases, the site would be tracked in the environmental databases as an environmental case. Permitted sites without documented releases are, nevertheless, potential sources of hazardous materials in the soil and/or groundwater due to accidental spills, incidental leakage, or spillage that may have gone undetected. Some facilities are permitted for more than one hazardous material use and, therefore, could appear in more than one database.

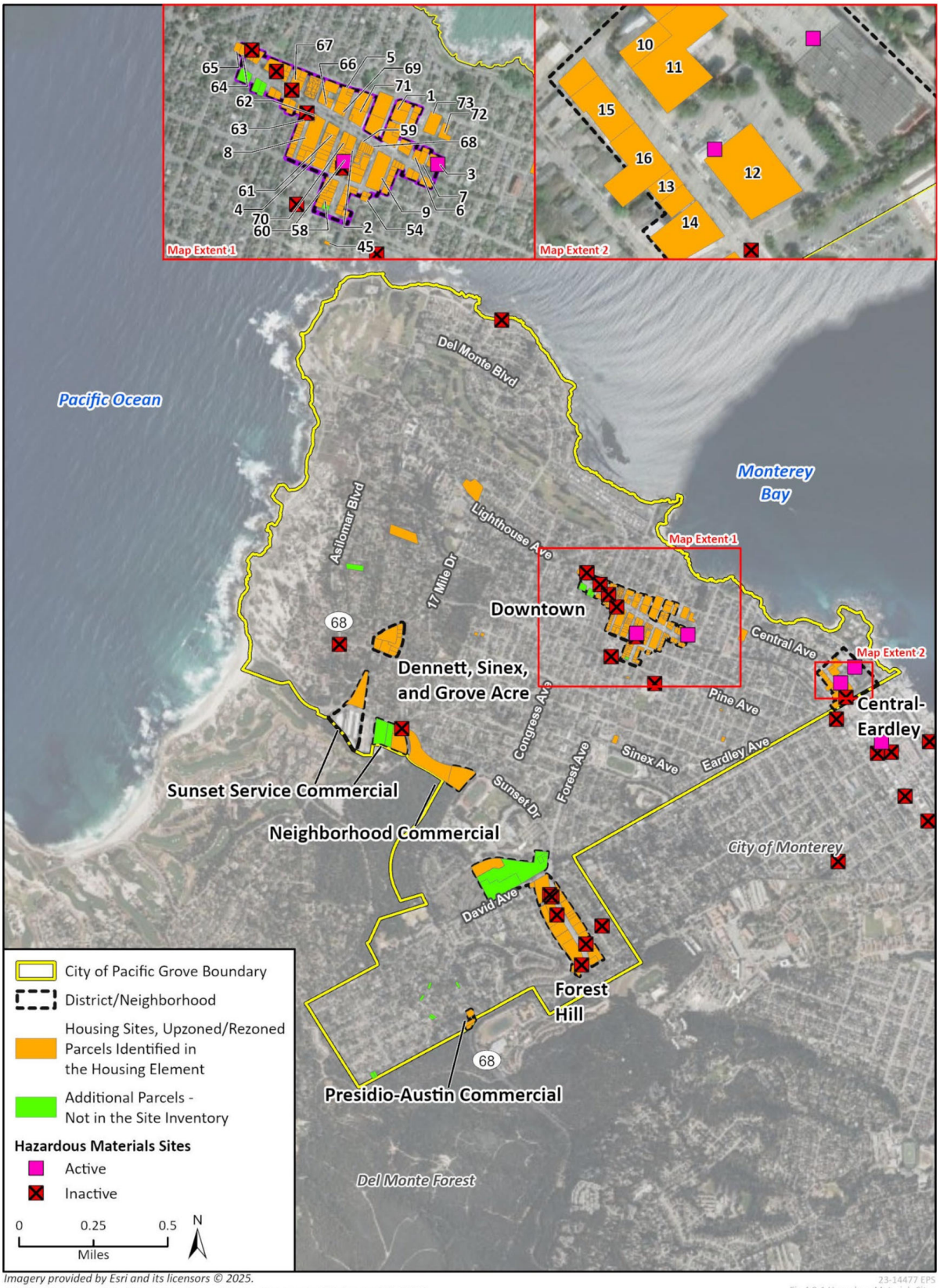
The potential to encounter hazardous materials in soil and groundwater is generally based on a search of federal, state, and local regulatory databases that identify permitted hazardous materials uses, environmental cases, and spill sites. The DTSC EnviroStor database contains information on properties in California where hazardous substances have been released or where the potential for a release exists. The State Water Resources Control Board (SWRCB) GeoTracker database contains information on properties in California for sites that require cleanup, such as leaking underground storage tank (LUST) sites, which may impact, or have potential impacts, to water quality, with emphasis on groundwater.

According to databases of hazardous material sites maintained by DTSC (EnviroStor) and the SWRCB (GeoTracker), the City of Pacific Grove does not have any of the following types of hazardous sites that are still active or need further investigation: federal Superfund, voluntary clean up, school clean up, evaluation, school investigation, tiered permit, or corrective action sites (DTSC 2025; SWRCB 2025).

According to DTSC and SWRCB, there are four active hazardous materials sites, 17 closed/inactive hazardous materials sites, and one active Cleanup and Abatement Order site within Pacific Grove (DTSC 2025; SWRCB 2025, 2022). There are no solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels (California Environmental Protection Agency 2025).

Hazardous materials sites within the city are shown in Figure 4.8-1. As shown therein, identified hazardous material sites are primarily located near Lighthouse Avenue in the northern portion of the city and in the Forest Hill Commercial District. Three of the housing sites overlap with or are adjacent to an active hazardous materials site. Eight housing sites and one additional parcel overlap with an inactive hazardous materials site. There are also six hazardous materials sites in the Downtown Commercial District and one hazardous materials site in the Central-Eardley Commercial District. These housing sites and the proximate hazardous materials sites are summarized in Table 4.8-1.

Figure 4.8-1 Hazardous Materials Sites in Pacific Grove



Imagery provided by Esri and its licensors © 2025.
Additional data provided by Geotracker and Envirostor; accessed February 6th, 2025.

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Fig 4.8-1 Hazardous Materials Sites

Table 4.8-1 Housing Sites Within or Adjacent to Hazardous Materials Sites

	Hazardous Materials Sites				
Hazardous Materials Site Address	**Site Name**	**Site Status**	**Site Type/Concern**	**Associated Housing Site or Additional Parcel No.**	**Within or Adjacent to Housing Site or Additional Parcel**
Active Hazardous Materials Sites					
166 12th Street	Grove Laundry	Open – inactive as of 2/3/2022	Former dry cleaner; contaminated structure, groundwater, soil	3	Within
100/120 Central Avenue	DiMaggio's Classic Cleaners	Open – site assessment as of 3/6/2020	Existing dry cleaner; contaminated structure, groundwater, soil, soil vapor	12	Adjacent
222 Grand Avenue	Pacific Grove Cleaners	Open – site assessment as of 8/6/2024	Former dry cleaner; media of concern unknown	60	Within
Inactive Hazardous Materials Sites					
1146/ 1152 Forest Avenue	Mobil Service Station 10-422	Completed – case closed as of 3/25/1992	LUST; gasoline in groundwater	21	Within
1140 Forest Avenue	Unocal Services Station #4242	Completed – case closed as of 1/1/1990	LUST; gasoline in soil	29	Within
1201 Forest Avenue	Former Alliance Gas	Completed – case closed as of 5/19/2022	LUST; gasoline in groundwater	32	Within
1224 Forest Avenue	Goodyear	Completed – case closed as of 12/10/1994	LUST; waste vehicle fluids (oil, hydraulic, lubricating)	36	Within
Sunset Drive and 17 Mile Drive	17 Mile Store	Completed – case closed as of 2/10/2021	LUST; gasoline and other fuel oxygenates in groundwater	48	Within
222 Grand Avenue	Cypress Cleaners	Completed – case closed as of 11/16/2007	Former dry cleaner; contaminated structure, groundwater, soil	60	Within
716 Lighthouse Avenue	Shell	Completed – case closed as of 10/24/2013	LUST; gasoline in groundwater	64	Within
1012 Pacific Grove Lane	Pacific Grove Apartments	Completed – case closed as of 12/31/2004	LUST; gasoline in groundwater	64	Within
650 Lighthouse Avenue	Unocal Services Station #3342	Completed – case closed as of 11/12/1987	LUST; gasoline in groundwater	67	Within
617 Lighthouse Avenue	The General Store	Completed – case closed as of 11/16/2007	LUST; gasoline in groundwater	A14	Within

Sources: DTSC 2025; SWRCB 2025, 2023

Use, Transport, and Abatement of Hazardous Materials

The use of hazardous materials is typically associated with industrial land uses. Activities such as manufacturing, plating, cleaning, refining, and finishing frequently involve chemicals that are considered hazardous when accidentally released into the environment. Some parcels in the project area are currently used for industrial purposes.

To a lesser extent, hazardous materials may also be used by various commercial enterprises, as well as residential uses. In particular, dry cleaners use cleaning agents considered to be hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides, and pesticides. Swimming pool supply stores stock acids, algaecides, and caustic agents. Most commercial businesses occasionally use commonly available cleaning supplies that, when used in accordance with manufacturers' recommendations, are considered safe by the State of California, but when not handled properly can be considered hazardous. Private residences also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides. The project area includes both commercial and residential land uses.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soil or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. In accordance with such regulations, the transport of hazardous materials and waste can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest, which includes forms, reports, and procedures designed to seamlessly track hazardous waste.

Schools

School locations require consideration because children are particularly sensitive to hazardous materials exposure. Additional protective regulations apply to projects that could use or disturb potentially hazardous products near or at schools. The California Public Resources Code requires projects that would be located within 0.25 mile of a school and might reasonably be expected to emit or handle hazardous materials to consult with the school district regarding potential hazards.

Several Pacific Grove Unified School District schools are located within the project area, including:

- Forest Grove Elementary at 1065 Congress Avenue
- Robert Down Elementary at 485 Pine Avenue
- Pacific Grove Middle at 835 Forest Avenue
- Pacific Grove Community High at 1004 David Avenue
- Pacific Grove High School at 615 Sunset Drive
- Monterey Bay Charter School at 1004 David Avenue

Robert Down Elementary is located on a former military cleanup site; however, remediation has occurred and this case has been closed as of May 2010. Robert Down Elementary is within 0.25 mile of two LUST sites but these sites are also inactive with their cases closed. Pacific Grove High School is also within 0.25 mile of two LUST sites, but these sites are also inactive with their cases closed. There are no hazardous materials sites located within 0.25 mile of the other schools in Pacific Grove.

4.8.2 Regulatory Setting

a. Federal Regulations

United States Environmental Protection Agency

USEPA is the agency primarily responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are contained in the Code of Federal Regulations (CFR) Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. The management of hazardous materials is governed by the following laws, which include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. USEPA provides oversight and supervision for federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act (1976)

These acts established a program administered by USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. The Resource Conservation and Recovery Act was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Comprehensive Environmental Response, Compensation and Liability Act (1980), amended by the Superfund Amendments and Reauthorization Act (1986; Public Law 99-499)

CERCLA was enacted in 1980 and provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List.

The Superfund Amendments and Reauthorization Act amended CERCLA to reflect lessons learned by USEPA during the first six years administering the Superfund program. The Superfund Amendments and Reauthorization Act provided new enforcement authorities and settlement tools, increased the focus on human health problems posed by hazardous waste sites, and encouraged greater citizen participation in making decisions on how sites should be cleaned up. The law also increased state involvement in every phase of the Superfund program and required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations.

Lead-Based Paint Elimination Final Rule (Title 24 Code of Federal Regulations)

Governed by the United States Department of Housing and Urban Development, regulations for LBP are contained in the Lead-Based Paint Elimination Final Rule (Title 24 CFR 33), which requires sellers and lessors to disclose known LBP and LBP hazards to perspective purchasers and lessees. Additionally, all LBP abatement activities must comply with the requirements of California and federal occupational safety and health administrations (including the California Occupational Safety and Health Administration [Cal/OSHA] and the Federal Occupational Safety and Health Administration [OSHA], respectively) and with the requirements of the State of California Department of Health Services. Only LBP trained and certified abatement personnel can perform abatement activities. All LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

b. State Regulations

Department of Toxic Substances Control

As a department of the California Environmental Protection Agency, DTSC is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of the Resource Conservation and Recovery Act and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law to regulate hazardous wastes which is implemented by regulations described in Title 26 of the California Code of Regulations. While the Hazardous Waste Control Law is generally more stringent than the Resource Conservation and Recovery Act, until USEPA approves the California program, both state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills. Environmental health standards for management of hazardous waste are contained in Title 22, Division 4.5 of the California Code of Regulations.

Government Code Section 65962.5 requires DTSC, the State Department of Health Services, SWRCB, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state, collectively known as the Cortese List. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it is considered a hazardous waste if it exceeds specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

California Fire and Building Code

The 2022 California Fire and Building Code establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare for the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of this code apply to the construction, alteration, movement enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.

California Health and Safety Code Chapter 6.7, Underground Storage of Hazardous Substances

Chapter 6.7 of the California Health and Safety Code regulates the underground storage of hazardous substances to protect public health and the environment. It mandates that owners and operators of USTs comply with strict requirements for the design, construction, installation, and maintenance of these tanks to prevent leaks and spills. The chapter includes provisions for obtaining permits, conducting regular inspections, and implementing spill containment measures. It also requires financial responsibility for cleanup costs in case of leaks and outlines penalties for non-compliance.

California Code of Regulations Title 8, Hazardous Waste Operations and Emergency Response and Hazard Communication Standard

Title 8, Section 5192 of the California Code of Regulations governs hazardous waste operations and emergency response to ensure worker safety and environmental protection. It mandates comprehensive safety and health programs for hazardous waste site clean-ups, including training, protective equipment, and emergency procedures. Title 8, Section 5194, known as the Hazard Communication Standard, requires employers to inform and train employees about hazardous chemicals in the workplace through labels, safety data sheets, and a written hazard communication program. Both sections aim to mitigate risks associated with hazardous substances and ensure compliance with safety standards.

California Occupational Safety and Health Administration Title 8

Pursuant to the requirements of the California Occupational Safety and Health Administration (Cal/OSHA) Title 8, employers must develop site-specific Health and Safety Plans. Workers potentially exposed to hazardous materials in their workplace must be trained so that they are aware of the hazards and provided necessary protection from the hazardous materials.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program requires the administrative consolidation of hazardous materials and waste programs under one agency, called a Certified Unified Program Agency. Certified Unified Program Agencies are responsible for carrying out several state hazardous materials regulatory programs. The intent of this program is to streamline hazardous materials management under one agency, so that businesses that use hazardous materials require fewer inspections and do not have to comply with overlapping requirements of formerly independently managed programs. The Certified Unified Program Agency for Monterey County is the county's Hazardous Materials Management Services.

Senate Bill 99

California Senate Bill 99 (SB 99) mandates the inclusion of emergency evacuation routes in the safety elements of general plans to enhance community safety. SB 99 requires cities and counties to identify residential developments in hazard areas that lack at least two emergency evacuation routes and update their safety elements accordingly. This update must occur upon the next revision of the housing element on or after January 1, 2020. The bill aims to ensure that residents in hazard-prone areas have adequate evacuation options during emergencies, such as wildfires or floods, thereby improving public safety and preparedness.

Assembly Bill 747

California Assembly Bill 747 (AB 747) requires the safety elements of general plans to be reviewed and updated to identify evacuation routes and their capacity, safety, and viability under various emergency scenarios. This update must occur upon the next revision of a local hazard mitigation plan on or after January 1, 2022, or by January 1, 2022, if a local jurisdiction has not yet adopted such a plan. The bill allows cities and counties that have adopted a local hazard mitigation plan, emergency operations plan, or similar document to use that information in the safety element by summarizing and incorporating it by reference.

c. Regional and Local Regulations

County of Monterey Hazardous Materials Business Plan Program

Businesses within Monterey County must complete a Hazardous Materials Business Plan using an electronic reporting system for the safe storage and use of chemicals. Firefighters, health officials, planners, public safety officers, health care providers and others rely on the Hazardous Materials Business Plan in an emergency. It is used to prevent or lessen damage to the health and safety of people and the environment when a hazardous material is released. The Hazardous Materials Business Plan Program is also known as the Community Right to Know Program and any citizen has the right to review these plans upon request.

2022 Multi-Jurisdictional Hazard Mitigation Plan

The 2022 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), prepared for the County of Monterey in partnership with local governments within the county, identifies natural and manmade hazards that Monterey County is vulnerable to and establishes short-term and long-term policies, programs, projects, and other activities to alleviate the risks to life and property that can result from a disaster (County of Monterey 2022). Monterey County's MJHMP was approved by the Federal Emergency Management Agency, which establishes requirements for the contents of such plans, in September 2022. The MJHMP was adopted by Monterey County in March 2022 and by Pacific Grove in August 2022.

Monterey Regional Airport Land Use Compatibility Plan

The Monterey Regional Airport Land Use Compatibility Plan (ALUCP) was prepared according to Federal Aviation Administration requirements and adopted by Monterey County in 2019, fulfilling California State requirements (California Public Utilities Code, Article 3.5, Section 21670, et seq.). Each ALUCP prevents exposure to excessive noise and safety hazards within an airport influence area over a 20-year horizon and are intended to encourage land uses in the vicinity surrounding an

airport that are compatible with the airport land uses. The Monterey Regional ALUCP includes the entire area of Pacific Grove in its Airport Influence Area (AIA). State law requires that sellers or lessors of real estate must disclose that the property is located within an AIA and may be subject to the annoyances or inconveniences associated with proximity to airport operations (California Business and Professional Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353).

Monterey Bay Air Resources District Rule 424

The Monterey Bay Air Resources District (MBARD) Rule 424, National Emission Standards for Hazardous Air Pollutants incorporates Title 40 of the Code of Federal Regulations, Chapter I, Parts 61 and 63. Rule 424 regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and clean up procedures. The control of asbestos during demolition or renovation of buildings is regulated under the Clean Air Act through the National Emission Standards for Hazardous Air Pollutants. Rule 424 applies to demolition or renovation of structures with asbestos-containing materials.

Pacific Grove General Plan

The current Pacific Grove General Plan Health and Safety Element, adopted in 1989, includes policies that aim to reduce potential hazards, including the following:

Goal 1, Policy 5. Work with the Airport District to monitor safety and noise concerns for Pacific Grove.

Goal 2. Provide aid to the community as needed in the event of natural or man-made disasters.

- **Policy 6.** Ensure that City emergency response procedures are adequate to deal with natural or man-made disasters in the community.
- **Policy 7.** Periodically update and test the effectiveness of the City's Multi-Hazard Emergency Plan.
- **Policy 9.** Maintain a level of preparedness adequate to implement all parts of the Multi-Hazard Emergency Plan.
  - **Program G**. Identify emergency access routes.
  - **Program L.** Continue to maintain appropriate licenses and permits for the storage of hazardous materials.

Goal 4. Prevent loss of life, injury, and property damage from fires, release of hazardous materials, natural disasters, and exposure to other hazardous conditions.

- **Policy 15.** Require all construction to meet the applicable current City codes for fire and life safety.
- **Policy 19.** Maintain an ongoing comprehensive hazard abatement program that requires property owners to remove fire hazards, including vegetation, hazardous structures and materials, and debris, as directed by the Fire Department.
  - **Program V.** Require businesses that manufacture, store, use, or transport significant quantities of hazardous and toxic materials to annually identify such materials and their quantities and to notify the Fire Department of any changes in such materials or activities.
  - **Program W**. Maintain a current inventory of hazardous and toxic materials by location, for use by the Fire Department and the Community Development Department.

Pacific Grove Municipal Code

Several sections of Pacific Grove Municipal Code regulate hazardous materials and intend to avoid or eliminate hazards. Section 23.90.150 applies to development with the Coastal Zone and requires that a water quality assessment be prepared for all development proposals, including a plan to address construction and operation stormwater runoff, measures to control erosion, and measures to reduce or prevent pollutants from entering storm drains, drainage systems, and watercourses. Section 15.01.150, which applies to development in the entire city, requires projects permitted by the City to obey and enforce all applicable safety orders, rules, and recommendations. This section also requires hazardous conditions and nuisances during construction to be immediately remedied upon receipt of notice from the city, and to appropriately safeguard the public from construction sites. As part of the City's Stormwater Management and Discharge Control Ordinance, Section 9.30.090 prohibits the discharge of pollutants or water containing pollutants into storm drains or watercourses. Section 23.64.340 requires all approved applications for use permits, variances, and subdivisions to be consistent with the Monterey County's current and applicable hazardous waste management plan. Section 24.32.110 requires that the minimum width of street rights-of-way in proposed subdivisions is 50 feet.

4.8.3 Impact Analysis

a. Methodology and Thresholds of Significance

Methodology

The project's impacts related to hazards and hazardous materials are evaluated based on the project's adherence to local, state, and federal requirements; the nature of proposed soil disturbance, construction activities, and its potential to release hazardous materials; the change in land use and proposed operational activities; proximity to schools and airports; the nature of proposed development and its potential to impair emergency access; and the risk of wildland fires.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on hazards and hazardous materials if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. 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;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
4. 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 create a significant hazard to the public or the environment;
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area;

6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
Threshold 2:	Would the project 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?

Impact HAZ-1 DEVELOPMENT FACILITATED BY THE PROJECT MAY RESULT IN THE RELEASE OF HAZARDOUS MATERIALS. HOWEVER, COMPLIANCE WITH FEDERAL, STATE, AND REGIONAL REGULATIONS RELATED TO HAZARDOUS MATERIALS WOULD MINIMIZE THE RISK OF RELEASES AND EXPOSURE TO THESE MATERIALS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction and Demolition

As described in Section 4.8.1, *Setting*, three of the housing sites (Sites 3, 12, and 60) are located on or are adjacent to an active hazardous materials site. These active hazardous materials sites are related to former or existing dry cleaning activities, which have resulted in contamination of structures, soil, soil vapor, and/or groundwater. Demolition and excavation activities associated with redevelopment of Sites 3, 12, and 60 could release hazardous materials into the environment if they are not properly handled, transported, and disposed of properly. Additionally, development facilitated by the project on housing sites, in upzoning areas, or on additional parcels that are within or adjacent to closed hazardous materials sites could disturb hazardous materials, even if the cases are closed. Furthermore, development facilitated by the project would consist of residential and commercial development, mostly in areas of Pacific Grove that are already developed with existing structures. Demolition of existing structures could result in the release of lead, asbestos, and/or PCBs, if existing buildings contain these substances.

Prior to development within known hazardous materials sites, the sites would be remediated through coordination with the appropriate regulatory agency, including DTSC, Regional Water Quality Control Board (Water Board), Cal/OSHA, the Monterey County Hazardous Materials Management Services, or other applicable regulatory agencies. Compliance with existing applicable regulations and policies would minimize risks from the release of hazardous materials, substances, or waste. In addition, oversight by the appropriate federal, state, and local agencies and compliance with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of release and exposure of hazardous materials.

Lead-based materials are regulated by Cal/OSHA. California Code of Regulations Section 1532.1 requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed Cal/OSHA standards. Under this rule, construction workers (and by extension, neighboring properties) may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight-hour period and exposure must be reduced to lower concentrations if the workday exceeds eight hours.

Similarly, California Code of Regulations Section 1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers. The control of asbestos during demolition or renovation of buildings is regulated under the Clean Air Act. The Clean Air Act requires a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all ACMs, adequately wetting all regulated ACMs, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable (USEPA 2024b). The Monterey County Environmental Health Bureau is responsible for regulating proper asbestos disposal.

Friable ACMs are regulated as a hazardous air pollutant under the Clean Air Act. As a worker safety hazard, they are also regulated under the authority of Cal/OSHA and by the Monterey Bay Air Resources District. In structures that would be demolished, any ACMs would be abated in accordance with federal, state, and local regulations prior to the start of demolition or renovation activities. Compliance with these regulations would ensure that asbestos removal would not result in the release of hazardous materials to the environment that could impair human health. Additionally, Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos.

Fluorescent lighting ballasts manufactured prior to 1978 and electrical transformers, capacitors, and generators manufactured prior to 1977 may contain PCBs. In accordance with the Toxic Substances Control Act and other federal and state regulations, individual projects would be required to properly handle and dispose of electrical equipment and lighting ballasts that contain PCBs during demolition of older buildings. The Monterey County Environmental Health Bureau regulates proper disposal of PCBs.

Residential and commercial development facilitated by the project would include the use of construction machinery that would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. Additionally, hazardous materials would be needed for fueling and servicing construction equipment. These types of hazardous materials are not acutely hazardous,[1] and all storage, handling, use, and disposal of these materials are regulated by federal, state, and county regulations. Development facilitated by the project would be required to comply with applicable regulations and standards discussed in Section 4.8.2, *Regulatory Setting*, including the Toxic Substances Control Act, CERCLA, and the California Fire and Building Codes.

In summary, development facilitated by the project would be required to comply with federal and state regulations, including but not limited to the Clean Air Act, CERCLA, the Toxic Substances Control Act, the California Health and Safety Code, the California Fire and Building Codes, and MBARD Rule 424, pertaining to the removal and disposal of ACMs, PCBs, and other hazardous materials. Compliance with applicable standards would minimize impacts related to hazardous materials during demolition and construction to a less than significant level.

Operation

Development facilitated by the proposed project would result in the addition of residential units and commercial space in the project area. Residential uses do not typically utilize substantial quantities of hazardous materials and thereby pose little risk of exposing the public to hazardous materials. In

[1] "Acutely hazardous" materials are materials that would cause death, disabling personal injury, or serious illness (DTSC 2024).

the event of a hazardous materials accident, the Monterey County Hazardous Materials Management Service would respond.

Commercial uses often involve the use of hazardous materials in various operations; commercial development facilitated by the project would be required to comply with hazardous materials regulations established by the California Code of Regulations. These regulations include Title 8, Section 5192, which covers hazardous waste operations and emergency response protocols, and Title 8, Section 5194, which mandates hazard communication programs to inform employees about the hazardous chemicals they may encounter. Additionally, agencies such as Cal/OSHA and OSHA enforce these regulations to ensure that businesses implement safety measures and training programs to minimize hazardous materials risks to the public and employees.

Compliance with these regulations would minimize impacts from operation-related hazardous materials to a less than significant level.

Conclusion

Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials during both construction and operation. Oversight by the appropriate federal, state, and local agencies and compliance with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Therefore, impacts from a hazard to the public or the environment through routine transport, use or disposal of hazardous materials and reasonably foreseeable upset and/or accident conditions would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-2 DEVELOPMENT FACILITATED BY THE PROJECT MAY RESULT IN THE RELEASE OF HAZARDOUS MATERIALS WITHIN 0.25 MILE OF A SCHOOL. HOWEVER, COMPLIANCE WITH REGIONAL AND FEDERAL REGULATIONS RELATED TO HAZARDOUS MATERIALS WOULD MINIMIZE THE RISK OF RELEASES AND EXPOSURE TO THESE MATERIALS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The proposed project would facilitate residential and commercial development in the vicinity of some schools. Housing sites, additional parcels, and upzoning areas that are proximate to schools include sites in the Downtown District, which are within 0.25 mile of Robert Down Elementary School; Site 51, which is immediately south of Pacific Grove Middle School across Sinex Avenue; and sites within the Forest Hill Commercial District, which are within 0.25 mile of Pacific Grove High School. While some housing sites, upzoning areas, and additional parcels associated with active or inactive hazardous materials sites may have pre-existing contamination, they would be remediated through coordination with the appropriate regulatory agency, including DTSC, Cal/OSHA, the Monterey County Hazardous Materials Management Services, or other applicable regulatory agencies, as described under Impact HAZ-1. Compliance with existing applicable regulations and policies would minimize risks from the release of hazardous materials, substances, or waste during construction. Oversight by the appropriate federal, state, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials

would minimize the risk of nearby schools' potential exposure to these substances during operation. In addition, and discussed under Impact HAZ-1, compliance with existing regulations applicable to the construction and operation of residential and commercial uses would prevent the release of hazardous materials to the extent feasible, and would reduce the potential for the emission of hazardous materials near schools. Accordingly, impacts related to emitting or handling hazardous materials within 0.25 mile of a school would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 4:	Would the project be located on a site that is included on a list of hazardous material 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?

Impact HAZ-3 SOME HOUSING SITES, UPZONING AREAS, AND ADDITIONAL PARCELS ARE INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED ON A LIST PURSUANT TO GOVERNMENT CODE SECTION 65962.5. DEVELOPMENT FACILITATED BY THE PROJECT IN THESE AREAS COULD CREATE A HAZARD TO THE PUBLIC OR THE ENVIRONMENT. HOWEVER, REQUIRED REMEDIATION AND COMPLIANCE WITH APPLICABLE REGULATIONS WOULD REDUCE IMPACTS TO A LESS THAN SIGNIFICANT LEVEL.

As shown in Figure 4.8-1, 12 housing sites, upzoning areas, or additional parcels are listed hazardous materials sites. Sites 3 and 60 are listed as active hazardous materials sites related to former or existing dry cleaning activities, which have resulted in contamination of structures, soil, soil vapor, and/or groundwater. Site 12 is adjacent to an active hazardous materials site, which is also related to former or existing dry cleaning activities. Sites 21, 29, 32, 36, 48, 60, 64, 67, and A14 are listed as inactive hazardous materials sites, which are related to dry cleaning activities or former LUST cases. Inactive hazardous materials sites have completed required remediation and have no further action required for their present land use, although additional action may be required during future construction activities or for proposed land use changes.

Development facilitated by the project on or near these listed hazardous materials sites could create a hazard to the public or the environment through the release of hazardous materials. Hazardous materials within structures, soil, or groundwater could be released into the air or water by demolition and construction activities. However, prior to development within known hazardous materials sites, if remediation is not already complete, individual sites would be remediated through coordination with the appropriate regulatory agency, including DTSC, Water Board, Cal/OSHA, the Monterey County Hazardous Materials Management Services, or other applicable regulatory agencies. The regulatory agency with oversight on development within individual sites may require actions such as development of subsurface investigation workplans; completion of additional soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and off-site disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents.

Potential risks, if any, posed by sites with former USTs would be minimized by managing the site according to existing standards contained in California Health and Safety Code Division 20, Chapters 6.7 and 6.75 (UST Program), as enforced and monitored by the Environmental Programs Division. The extent to which groundwater may be affected by an UST or other potential contamination source depends on the type of contaminant, the amount released, the duration of the release, distance from source, and depth to groundwater. If contamination exceeds regulatory action levels,

future developers would be required to undertake remediation procedures prior to grading and development under the supervision of DTSC, the Water Board, or a qualified Local Oversight Program agency, depending on the nature of any identified contamination and oversight agreement between the agencies.

Compliance with existing applicable regulations and policies would minimize risks from the release of hazardous materials, substances, or waste, and oversight by the appropriate federal, state, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of release and exposure of hazardous materials. Accordingly, impacts related to hazardous materials sites listed pursuant to Government Code 65962.5 would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 5:	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?

Impact HAZ-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN A SAFETY HAZARD OR EXCESSIVE NOISE FROM THE NEAREST AIRPORT FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Monterey Regional Airport is located approximately 3.5 miles east of Pacific Grove. The Monterey Regional ALUCP maps the entire project area within the AIA; however, the project area is not within the identified traffic overflight zone or noise contour mapping of the Monterey Regional ALUCP. The mapped flight airspace does overlap with portions of the project area, at elevations higher than 500 feet; which is not anticipated to result in height conflicts with existing or proposed future development in the project area, due to the limited building heights facilitated by the project. The AIA may be subject to the annoyances or inconveniences associated with proximity to airport operations and requires that sellers or lessors of real estate must disclose that the property is located within an AIA (County of Monterey 2019: 1-5).

The project area is outside the noise contours and the traffic overflight zone designated in the Monterey Regional ALUCP, indicating that future residents and workers in housing sites, upzoning areas, and additional parcels would not be substantially affected by aircraft noise and overflight hazards. In addition, development facilitated by the project would be required to comply with the Monterey Regional ALUCP, and applicable regional and local regulations, which establish maximum development heights in various overflight zones and compatible land uses in the AIA. Impacts related to safety hazards and excessive noise from an airport would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 6:	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN ANY PHYSICAL CHANGES THAT COULD INTERFERE WITH OR IMPAIR EMERGENCY RESPONSE OR EVACUATION, AND THE PROJECT WOULD NOT RESULT IN INTERFERENCE WITH THESE TYPES OF ADOPTED PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

There are no proposed physical changes under the project, such as reconstruction or alteration of existing roadways, that would interfere or impair emergency response or evacuation. The project would not result in changes to emergency evacuation routes. Additionally, as part of the proposed project, the City General Plan Health and Safety Element is being updated pursuant to the requirements of AB 747 and SB 99, which have mandated the inclusion of additional assessments and measures associated with emergency evacuation, including identification of emergency evacuation routes and capacity. The updated Health and Safety Element includes the identification of evacuation routes and capacity pursuant to AB 747 and SB 99 as well as updated and revised policies related to emergency response and preparedness. These revisions can be found in Appendix C. At the time of preparation of this DEIR, the proposed revisions to the Health and Safety Element have not yet been finalized. Final revisions are subject to review and approval by the California Board of Forestry and subsequent adoption by the City of Pacific Grove. This process is anticipated to be completed prior to certification and adoption of the Final EIR. The following goals, policies, and programs of the Updated Health and Safety Element would enhance emergency response and emergency evacuation procedures in the city:

Goal 2. Provide aid to the community as needed in the event of natural or man-made disasters.

- **Policy 6.** Ensure that City emergency response procedures are adequate to deal with natural or man-made disasters in the community.
- **Policy 7.** Periodically update and test the effectiveness of the City's Multi-Hazard Emergency Plan.
- **Policy 8**. Ensure that individuals and agencies assigned emergency responsibilities under the Multi-Hazard Emergency Plan prepare appropriate supporting plans and related standard operating procedures.
- **Policy 9**. Maintain a level of preparedness adequate to implement all parts of the Multi-Hazard Emergency Plan.
  - **Program D.** Periodically review and update alerting procedures and resources lists.
  - **Program E.** Review County and State emergency response plans and procedures to ensure coordination with the City's Multi- Hazard Emergency Plan as part of the periodic update of the City's plan.
  - **Program F.** Develop and implement public information programs concerning disaster response and emergency preparedness.
  - **Program G.** Identify emergency access routes.
  - **Program H.** Include provisions for persons with disabilities in emergency response plans.
  - **Program I.** Identify alternative water sources for fire-fighting purposes for use during a disaster.
  - **Program J.** Designate and develop a command center for use during emergencies.
  - **Program K.** Develop and maintain mutual aid agreements and communications links with surrounding jurisdictions for assistance during emergencies.

Development facilitated by the project would accommodate future population growth in Pacific Grove and would increase vehicle trips in the project area. This could lead to increased congestion during emergency evacuations. However, the City would review and approve individual projects facilitated by the project to ensure that emergency access meets city standards. Additionally, the Monterey County MJHMP incorporates new development and growth into each update.

Development facilitated by the project, as well as all development in the project area, must comply with roadway width standards established by Pacific Grove Municipal Code Section 24.32.110. Further, future development would be reviewed by the Pacific Grove Fire Department, which is a part of the Monterey Fire Department, to ensure development would not interfere with evacuation routes and would not impede the effectiveness of evacuation plans. Therefore, the project would not impair implementation of or physically interfere with evacuation or emergency response plans. The impact related to emergency response and evacuation plans would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 7:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact HAZ-6 SEVERAL SITES ARE LOCATED WITHIN OR ADJACENT TO A FIRE HAZARD SEVERITY ZONE. HOWEVER, COMPLIANCE WITH STATE AND FEDERAL REGULATIONS AND CITY POLICIES WOULD REDUCE THE RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES TO A LESS THAN SIGNIFICANT LEVEL.

The California Department of Forestry and Fire Protection (CAL FIRE) maps fire hazards based on zones, referred to as Fire Hazard Severity Zones (FHSZs). There are three levels of severity: Moderate; High; and Very High. As of January 2022, California State Law requires CAL FIRE to map the Moderate and High FHSZ in addition to the Very High FHSZ. Updates to the CAL FIRE State Responsibility Area FHSZ maps were made in 2023 and became effective in 2024, and CAL FIRE released updated Local Responsibility Area FHSZ recommendations in March 2025.

According to maps prepared by CAL FIRE, the southwestern portion of the city, generally south of Sunset Drive and southwest of David Avenue, is designated as a FHSZ. The following sites, additional parcels, and districts are located within a FHSZ.

Moderate FHSZ:

- Sunset Service Commercial District (Sites 48 and 49, and additional parcel A10)
- Neighborhood Commercial District (Site 55)
- Northwestern portion of Forest Hill District (Site 23, 29 and additional parcel A11)
- Site 50

High FHSZ:

- Central portion of Forest Hill District (Sites 20, 21, 22, 24, 25, 26, 27, 28, 30, and 31)

Very High FHSZ:

- Southeastern portion of Forest Hill District (Sites 32, 33, 34, 35, 36, and 37)
- Presidio-Austin Commercial District (Site 57)
- Additional parcels A3, A4, A5, A6, A7, A8, and A9

A full discussion of potential wildfire impacts is included in Section 4.17, *Wildfire.* As discussed therein, compliance with state and federal regulations and Pacific Grove Fire Department project-specific review would minimize the potential of the proposed project to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Furthermore, the proposed project would involve revisions to the Health and Safety Element of the City's General Plan. Proposed revisions to the Health and Safety Element include updated background information and maps to reflect existing conditions; identification of evacuation routes and capacity pursuant to AB 747 and SB 99; and updated and revised policies pertaining to hazards, including fire hazards. Proposed revisions to the City's Health and Safety Element are shown in Appendix C. At the time of preparation of this DEIR, the proposed revisions to the Health and Safety Element have not yet been finalized. Final revisions are subject to review and approval by the California Board of Forestry and subsequent adoption by the City of Pacific Grove. This process shall be completed prior to certification and adoption of the Final EIR. Because the purpose of these revisions is to comply with AB 747 and SB 99, and proposed revisions would be approved by the California Board of Forestry, it is not anticipated that further changes to the proposed revisions would substantially alter the intent of the revisions.

Future development would be required to comply with revised Health and Safety Element policies, which would reduce the risk of significant loss, injury, or death related to wildland fires. Impacts related to wildland fires would be less than significant.

Mitigation Measures

No mitigation is required.

4.8.4 Cumulative Impacts

The geographic scope for cumulative hazards and hazardous materials impacts is limited to projects within 0.25 mile of the project area. This geographic scope is appropriate because risks associated with hazards and hazardous materials occur largely in a site-specific and localized context, as adverse impacts from a hazardous materials release or spill diminish in magnitude with distance. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact hazards and hazardous materials.

Cumulative development in Pacific Grove and surrounding areas would gradually increase the population exposed to the use and transport of hazardous materials or a potential release of hazardous materials. However, compliance with existing laws and regulations applicable to the use and transport of hazardous materials, as outlined in Section 4.8.2, *Regulatory Setting,* would avoid and minimize the potential for the routine transport, use, or disposal of hazardous materials to create a significant hazard to the public or environment. Additionally, compliance with existing laws and regulations, including any potential remedial action on contaminated sites and emergency response and evacuation plans would avoid potential hazard impacts. Cumulative impacts related to the routine transport, use, or disposal of hazardous materials or the release of hazardous materials into the environment (Thresholds 1 and 2) would be less than significant.

Cumulative development would gradually increase the potential for the emission of hazardous materials within 0.25 mile of a school. However, development sites within Pacific Grove that have pre-existing contamination would be remediated through coordination with the appropriate regulatory agency, including DTSC, Cal/OSHA, the Monterey County Hazardous Materials Management Services, or other applicable regulatory agencies. Compliance with existing applicable regulations and policies would minimize risks from the release of hazardous materials, substances,

or waste within 0.25 mile of a school, and cumulative impacts related to emitting or handling hazardous materials within 0.25 mile of a school (Threshold 3) would be less than significant.

Cumulative development would have the potential to occur on hazardous materials sites included on a list pursuant to Government Code Section 65962.5 and could create a significant hazard to the public or environment. However, hazards and hazardous materials impacts associated with individual developments are site-specific in nature and must be addressed on a case-by-case basis. Additionally, compliance with existing laws and regulations, including any potential remedial action on contaminated sites and emergency response and evacuation plans would avoid potential hazard impacts. Cumulative impacts related to hazardous materials sites listed pursuant to Government Code Section 65962.5 (Threshold 4) would be less than significant.

Because all of Pacific Grove and most surrounding areas are within the AIA of the Monterey Regional Airport, cumulative development would have the potential to result in a safety hazard or excessive noise for people residing or working in the project area. However, development within the AIA would be required to comply with the Monterey Regional ALUCP, and applicable regional and local regulations related to safety hazards and noise exposure. Compliance with the Monterey Regional ALUCP would minimize cumulative impacts related to safety hazards and excessive noise from airports (Threshold 5) to a less than significant level.

Cumulative development could result in physical changes that could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. However, impacts to emergency response and evacuation of cumulative development would be evaluated on a case-by-case basis, and the jurisdiction in which cumulative development is located in (Pacific Grove, City of Monterey, or County of Monterey) would review and approve individual cumulative development projects to ensure that emergency access meets applicable local standards. This review would reduce cumulative impacts to emergency response or evacuation (Threshold 6) to a less than significant level.

Cumulative development in Pacific Grove and surrounding areas would gradually increase the population exposed to potential wildfire risks. Wildfire risks have generally increased over time due to environmental factors, such as drought, winds, and increased storm events associated with climate change. Cumulative development in the High and Very High FHSZs in Pacific Grove and in the Del Monte Forest/Pebble Beach area would increase the amount of people and structures that would be exposed to risk of loss, injury, or death involving wildland fires. Accordingly, cumulative impacts would be significant. As discussed under Impact HAZ-6 and in Section 4.17, *Wildfire,* compliance with state and federal regulations, Pacific Grove Fire Department project-specific review, and the revised and updated policies outlined in the City's Health and Safety Element (Appendix C) would minimize the potential of the proposed project to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Although cumulative impacts would be significant, the project would not result in a considerable contribution to this cumulative impact.

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4.9 Hydrology and Water Quality

This section evaluates the potential environmental effects of the proposed project related to water quality, drainage, groundwater, and flooding. The analysis includes a review of surface water, groundwater, inundation zones, and water quality. Water supply is discussed in Section 4.16, *Utilities and Service Systems*. Issues regarding wetlands and waters of the United States are discussed in Section 4.3, *Biological Resources*.

4.9.1 Setting

The project area is located on the Monterey Peninsula in northern Monterey County, California. Weather in the project area is characterized by a typical mediterranean coastal climate, which is generally dry in the summer with mild, wet winters. Rainfall is concentrated in the winter months with the wettest months being December, January, and February, which have average monthly rainfall totals of 3.41, 4.40, and 3.92 inches, respectively (United States Climate Data 2024).

a. Surface Water

Drainage

The California Department of Water Resources (DWR) divides surface watersheds in California into 10 hydrologic regions. The project area lies within the Central Coast Hydrologic Region, a large coastal region in central California that consists of approximately 11,300 square miles. The Central Coast Hydrologic Region includes all of Santa Cruz, Monterey, San Luis Obispo, and Santa Barbara counties; most of San Benito County; and portions of San Mateo, Santa Clara, and Ventura counties (DWR 2015: 1).

DWR subdivides hydrologic regions into hydrologic units which are further subdivided into hydrologic areas. Within the Central Coast Hydrologic Region, the project area is located entirely in the Salinas Hydrologic Unit and Monterey Peninsula Hydrologic Area (Central Coast Regional Water Quality Control Board [RWQCB] 2019: 27). The Central Coast RWQCB governs basin planning and water quality within the Monterey Peninsula Hydrologic Area (Central Coast RWQCB 2019: 2).

The project area has two major drainage basins, each of which drains approximately half of the project area. The southwesterly basin drains westward into the Pacific Ocean and the northeasterly basin drains northerly into Monterey Bay and into the Pacific Grove Area of Biological Significance (ASBS) (City of Pacific Grove 2024, 1994: 4). The Pacific Grove ASBS extends over 3.2 miles of coastline west from the Monterey Bay Aquarium to Asilomar Boulevard just before Point Pinos (City of Pacific Grove 2024). The ASBS lies entirely within the Monterey Bay National Marine Sanctuary and contains the Pacific Grove State Marine Conservation Area and Hopkins State Marine Reserve. The ASBS receives runoff from approximately 1,106 acres in Pacific Grove and 103 acres in Monterey including a small portion from the federal United States Army Presidio of Monterey (City of Pacific Grove 2024).

Runoff in the city is influenced by sloping topography, soils, storm drain infrastructure, and urban development. The project area consists of primarily sandy loam soils. The eastern portion of the project area is heavily paved. More than 40 percent of areas draining into the ASBS are impervious surfaces that are conveyed by the City's stormwater infrastructure (City of Pacific Grove 2020: 13-2).

Surface Water Quality

Water quality in the project area is governed by the Central Coast RWQCB, which sets water quality standards in the *Water Quality Control Plan for the Central Coastal Basin* (Basin Plan; Central Coast RWQCB 2019). The Basin Plan identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses. The identified beneficial uses and water quality objectives to maintain or achieve those uses are together known as water quality standards. The Central Coast RWQCB designates beneficial uses for some individual water bodies in the Central Coast Basin. All other water bodies not designated individually are assigned the designated uses of municipal and domestic water supply and protection of recreation and aquatic life. Surface water bodies in the project area include marine habitats along the edge of the Pacific Ocean, two freshwater ponds, and one intermittent stream (United States Fish and Wildlife Service 2025). Table 4.9-1 presents the designated beneficial uses listed in the Basin Plan for coastal waters which receive runoff from the project area.

Table 4.9-1 Beneficial Uses for Coastal Waters

Water Body	Beneficial Uses
Pacific Grove Marine Gardens	Water Contact Recreation; Non-Contact Water Recreation; Marine Habitat; Commercial and Sport Fishing; Rare, Threatened, or Endangered Species; Preservation of Biological Habitats of Special Significance; Wildlife Habitat
Hopkins Marine Life Refuge	Water Contact Recreation; Non-Contact Water Recreation; Marine Habitat; Commercial and Sport Fishing; Rare, Threatened, or Endangered Species; Preservation of Biological Habitats of Special Significance; Wildlife Habitat

Source: Central Coast RWQCB 2019: 24

In the City, stormwater runoff transports pollutants from urban development, streets, parking lots, and other sources to the Pacific Ocean. Activities such as land clearing, excavation and filling, illegal dumping, municipal operations, improper disposal of pet waste, and use of fertilizers, pesticides, and herbicides can generate stormwater pollution. Water quality concerns resulting from stormwater pollution include cadmium, lead, zinc, copper, ammonia, and mercury (State Water Resources Control Board [SWRCB] 2008: 96-97).

b. Groundwater

The project area does not overlie a designated groundwater basin (DWR 2024a); however, local areas of shallow or perched groundwater may be present. Water supply for development facilitated by the project would be provided by the California-American Water Company (Cal-Am). Cal-Am's water supply portfolio includes multiple supply sources, including groundwater from the Carmel River Aquifer and the adjudicated Seaside Groundwater Basin, both of which are managed by the Monterey Peninsula Water Management District (MPWMD). All use of groundwater from the Seaside Groundwater Basin is controlled by a 2006 adjudication judgment, which limits groundwater pumping to protect the basin from overuse (City of Pacific Grove 2020: 13-10). MPWMD recharges the Seaside Groundwater Basin through its Aquifer Storage and Recovery Program, which diverts excess Carmel River winter flows via Aquifer Storage and Recovery injection and recovery wells, currently recharging approximately 1,360 acre-feet per year (AFY) to the Seaside Groundwater Basin (MPWMD 2024).

Groundwater pumping limitations set forth in the adjudication judgment for the Seaside Groundwater Basin serve to protect the basin from overuse as well as to prevent seawater intrusion into the aquifer (City of Pacific Grove 2020: 13-10). In 2020, increased chloride concentrations were identified in two monitoring wells for the first time, which can indicate a precursor to seawater intrusion (Cal-Am 2021a: 6-4). However, no data collected in water year 2023 indicate that seawater intrusion is occurring within the Seaside Groundwater Basin (Seaside Basin Watermaster 2024: 11).

As discussed in Section 4.16, *Utilities and Service Systems*, MPWMD and Cal-Am are developing projects that use desalination and advanced water quality treatment to recharge local groundwater with highly treated recycled water. These water supply projects could improve chloride concentrations in the Seaside Groundwater Basin through dilution with high-quality treated water.

c. Flooding and Inundation

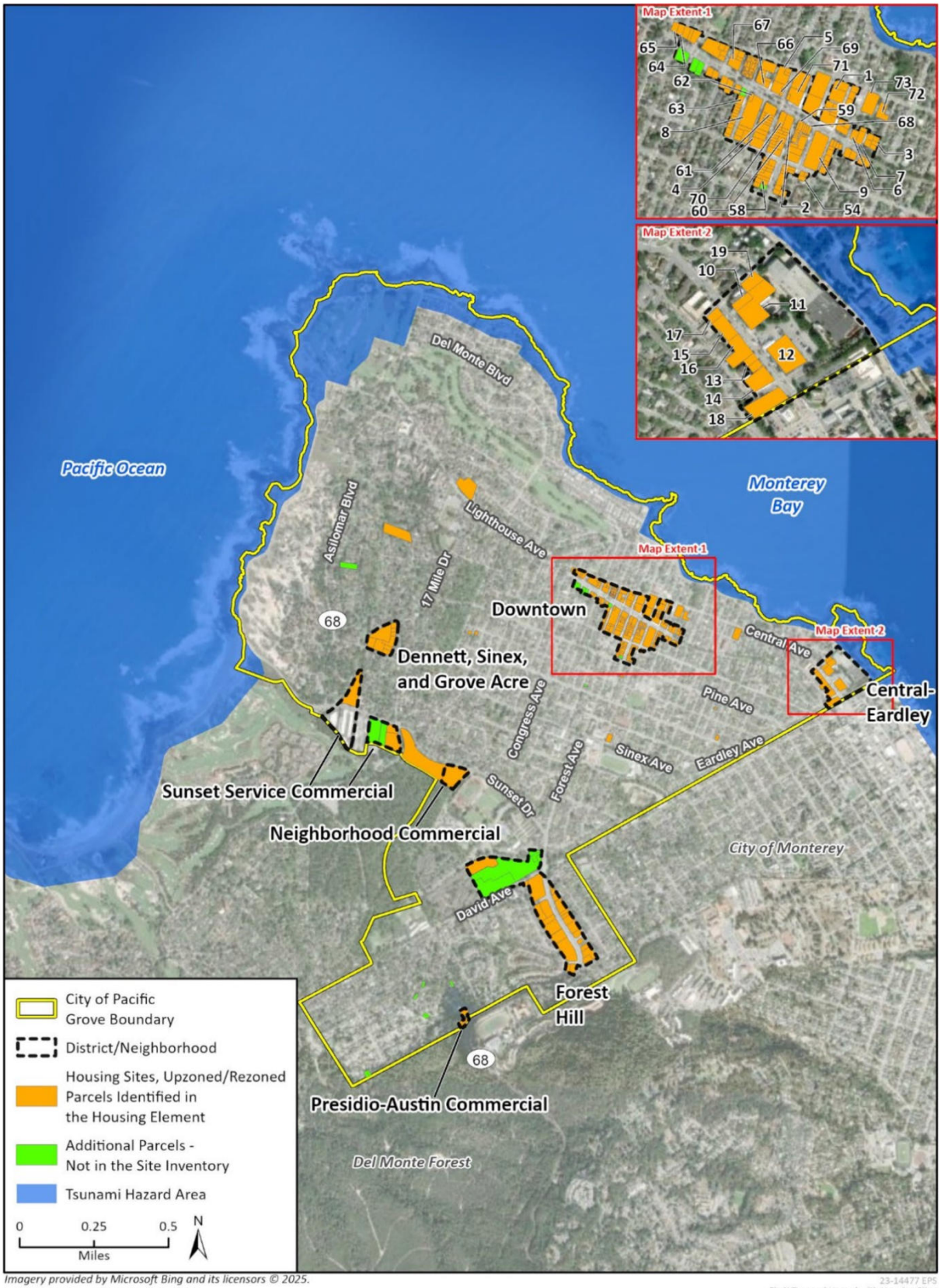
Flooding during storm events occurs when the amount of rainfall exceeds the infiltration capacity of the surrounding landscape or the conveyance capacity of the stormwater drainage system. The Federal Emergency Management Agency (FEMA) delineates regional flooding hazards on Flood Insurance Rate Maps as part of the National Flood Insurance Program. Zones with higher flood risk are called Special Flood Hazard Areas; these areas have a 1 percent chance or greater of flooding in a given year (also called the 100-year floodplain). Areas that have a 0.2 percent chance of flooding in a given year are called the 500-year floodplain. According to FEMA flood zone mapping, the majority of the project area is designated as Zone X, which indicates an area of minimal flood hazard, with areas adjacent to the Pacific Ocean and Monterey Bay at the outermost edges of the project area in Zone VE, a special flood hazard area (FEMA 2024; Flood Insurance Rate Map Nos. 06053C0306H, 06053C0168H, and 06053C0302H). Accordingly, the identified housing sites, upzoning areas, and additional parcels have a very low risk of flooding.

Tsunamis and seiches are two types of water waves that are generated by earthquake events. Tsunamis are broad-wavelength ocean waves, and seiches are standing waves within confined bodies of water, typically reservoirs. According to the California Tsunami Maps published by the California Department of Conservation and as shown on Figure 4.9-1, there are portions of the perimeter of Pacific Grove in the Coastal Zone that are within a Tsunami Hazard Area; however, inland Pacific Grove is not within a Tsunami Hazard Area (California Department of Conservation 2024). Pacific Grove has a tsunami warning system established with the Pacific Tsunami Warning Center in Hawaii and the Alaska Tsunami Warning Center in Alaska. In the event of a tsunami, these Centers would provide warnings to the National Weather Service which would pass them on to the Pacific Grove Police Department (City of Pacific Grove 2020: 13-5).

Due to the absence of large inland bodies of water within or upslope of the project area, the project area is not subject to inundation from seiche.

The closest dam to the project area is Forest Lake, located approximately 0.6-mile southwest of the Pacific Grove City limits. According to DWR's Dam Breach Inundation Map Web Publisher, the project area is not subject to inundation of dam failure (DWR 2024b).

Figure 4.9-1 Tsunami Hazard Areas in Pacific Grove



Imagery provided by Microsoft Bing and its licensors © 2025.
Additional data provided by CGS, 2022.

23-14477 EPS
Fig X Tsunami Hazard with Housing Sites

d. Sea Level Rise

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA]* v. *Bay Area Air Quality Management District [BAAQMD],* 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), evaluation of impacts related to existing environmental conditions to a proposed project is not considered to be within the purview of the CEQA process. Accordingly, this discussion of sea level rise is provided solely for informational purposes.

Flood potential could increase in Pacific Grove due to sea level rise. Although sea levels have generally not risen enough to pose a substantial risk of flooding to Pacific Grove, future sea level rise may be great enough to exacerbate existing flooding and erosion. The *Coastal Hazards Modeling Technical Methods and Results*, prepared by Integral Consulting Inc. in August 2024, is intended to inform shoreline management strategies for future sea level rise (Appendix I). The modeling considers impacts associated with a 20 percent chance that sea level rise will reach 4.4 feet by 2100, consistent with guidance from the California Ocean Protection Council. As described on Page 3-12 of the report, tidal inundation with projected sea level rise does not pose a threat to structures or developed land areas within Pacific Grove (Appendix I). The *Climate Change Vulnerability Assessment* prepared as part of the proposed project in conjunction with the City's Health and Safety Element Update (Appendix C), states that no structures located within sea level rise areas would experience inundation from sea level rise alone; however, the combined effect of sea level rise and coastal flooding would subject approximately 75 houses in the Otter Point area, which does not include identified housing sites, upzoning areas, or additional parcels, to flooding (Appendix C).

Based on the *Coastal Hazards Modeling Technical Methods and Results,* the *Climate Change Vulnerability Assessment*, and the National Oceanic and Atmospheric Administration's Sea Level Rise Viewer, identified housing sites, upzoning areas, or additional parcels are not subject to inundation due to sea level rise (Appendix I; Appendix C; National Oceanic and Atmospheric Administration 2024).

4.9.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Federal Water Pollution Control Act of 1948 was the first major law to address water pollution in the United States. In 1972, the Federal Water Pollution Control Act was amended and became known as the Clean Water Act (CWA). The CWA established the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gave the United States Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the CWA is administered by USEPA and United States Army Corps of Engineers (USACE).

The federal CWA places the primary responsibility for the control of water pollution and for the planning of development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. At the state and regional levels in California, the CWA is enforced by the SWRCB and the nine RWQCBs.

Section 401: Water Quality Certification

Under Section 401 of the CWA, the RWQCBs have regulatory authority over actions in waters of the United States and/or the State of California through the issuance of water quality certifications, which are issued in conjunction with a federal permit (e.g., permits issued by the USACE under Section 404 of the CWA, described below). Section 401 of the CWA provides the SWRCB and the RWQCBs with the regulatory authority to waive, certify, or deny a proposed activity that could result in a discharge to surface waters of the state. To waive or certify an activity, these agencies must find that the proposed discharge would comply with state water quality standards, including those protecting beneficial uses and water quality. If these agencies deny the proposed activity, the federal permit cannot be issued. This water quality certification is generally required for projects involving the discharge of dredge or fill material to wetlands or other bodies.

Section 402: National Pollutant Elimination System

Section 402 of the CWA establishes the National Pollutant Elimination System (NPDES) regulations for stormwater and other pollutant discharges. Section 402 prohibits discharge of pollutants to waters of the United States unless they are regulated by an NPDES permit. Stormwater discharges are regulated under a variety of NPDES permits, including municipal, agricultural, industrial, construction, and low-threat discharge permits.

In 1987, Congress amended the CWA to require the implementation of a two-phased program to address stormwater discharges. Phase I of the NPDES program, promulgated by USEPA in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s)[1] serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and 10 categories of industrial activities.

USEPA recognized that smaller construction projects (disturbing less than five acres) and small MS4s (serving populations smaller than 100,000) were also contributing substantially to pollutant discharges nationwide. Therefore, to further improve stormwater quality, USEPA promulgated the NPDES Phase II program in January 2000, which requires NPDES permits for stormwater discharges from regulated small MS4s and for construction sites disturbing between one and five acres of land.

In California, the NPDES program is administered by SWRCB through the nine RWQCBs. Further discussion of the NPDES program and permits in California relevant to the project are provided in discussion of state and local regulations, below.

Section 404: Discharge of Dredge or Fill

Section 404 of the CWA requires a permit be issued by USACE before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulations (e.g. farming activities, maintenance activities, construction of temporary sedimentation basins, construction and maintenance of forest roads or temporary mining roads). Waters of the United States generally include tidal waters, lakes, ponds, rivers, streams (including intermittent streams), and wetlands (with the exception of isolated wetlands).

[1] An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are owned by a state, city, town, or other public entity.

Section 303(d)

Section 303(d) of the CWA requires states to identify water bodies that do not meet water quality objectives and are not supporting their beneficial uses. Each state must submit an updated biennial list, called the 303(d) list, to USEPA. In addition to identifying the water bodies that are not supporting beneficial uses, the list also identifies the pollutant or stressor causing impairment and establishes a priority for developing a control plan to address the impairment. If a water body is designated as "impaired," then a total maximum daily load is developed and identified for the affected water body. A total maximum daily load establishes the maximum daily amount of a pollutant allowed in an identified water body and is used as a planning tool in addressing water quality impairments and improving water quality.

b. State Regulations

Porter-Cologne Water Quality Control Act of 1970

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of the CWA in California. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, regulate discharges to surface water and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of a hazardous substance, sewage, oil, or petroleum product. Each RWQCB must adopt and implement a Water Quality Control Plan for its region in conformance with the policies set forth in the Porter-Cologne Act. The project area is within the jurisdictional boundaries of the Central Coast RWQCB (Region 3), which sets water quality standards in the *Water Quality Control Plan for the Central Coastal Basin* (Basin Plan).

California Toxics Rule

In May 2000, USEPA promulgated the California Toxics Rule, which established numeric water quality criteria for toxic pollutants for waters in California. The California Toxics Rule provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated for human health or aquatic life uses. The California Toxics Rule is often used by the RWQCBs when establishing water quality objectives and total maximum daily loads of pollutants. Although the California Toxics Rule criteria do not apply directly to discharges of stormwater runoff, they are utilized as benchmarks for toxics in urban runoff and to evaluate the potential ecological impacts of stormwater runoff to receiving waters.

California Ocean Plan

The protection of ASBS areas in California is set forth by SWRCB through the California Ocean Plan, which prohibits discharge of waste to designated ASBS. In March 2012, SWRCB adopted a General Exception to the Ocean Plan waste discharge prohibition in relation to the ASBS. The General Exception is described in SWRCB Resolution No. 2012-0012 and amended by Resolution No. 2012-0031 and governs point and non-point source waste discharges to California's ASBS, which include municipal stormwater discharges. The Pacific Grove ASBS is covered under this exemption. The General Exception includes "Special Protections" for Beneficial Uses of ASBS and requires development of ASBS Compliance Plans to demonstrate local compliance by permitted point source dischargers, such as municipal dischargers and others to the ASBS.

Antidegradation Policy

The State Antidegradation Policy (Resolution No. 68-16) was adopted by SWRCB in 1968 to protect surface water and groundwater from degradation. The Antidegradation Policy applies to the disposal of waste to high-quality surface water and groundwater. The Antidegradation Policy requires the water quality of these water bodies be maintained unless SWRCB finds the change will be consistent with maximum benefit to the people of the state, will not unreasonably affect present and anticipated beneficial uses of the waters, and will not result in water quality less than that prescribed in policies regulating water quality. The Antidegradation Policy also requires the best practicable treatment or control of discharges to high-quality waters to assure pollution or nuisance will not occur and the highest possible water quality will be maintained.

Phase II Municipal Stormwater Permit

The Municipal Stormwater Permitting Program regulates stormwater discharges from MS4s. The NPDES MS4 permits in California are issued in two phases by SWRCB and the RWQCBs. Phase I MS4 permits are issued by the RWQCBs to medium (i.e., serving between 100,000 and 250,000 people) and large (i.e., serving more than 250,000 people) municipalities. Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The Phase II MS4 Permit is issued by the SWRCB and is applicable to smaller municipalities (i.e., populations of less than 100,000 people) and nontraditional small MS4s (e.g., military bases, public campuses, prison and hospital complexes). The Phase II MS4 Permit (*Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems [MS4s] General Permit],* Order No. 2013-0001-DWQ, NPDES No. CAS000004, as amended by Order Nos. 2015-0133-EXEC, 2016-0069-EXEC, 2017-0031-DWQ, 2018-0001-EXEC, 2018-0007-EXEC, and 2019-0009-EXEC) became effective on July 1, 2013 and covers Phase II permittees statewide, including Pacific Grove. The Phase II MS4 Permit requires permittees to develop a stormwater management program and individual dischargers to develop and implement Stormwater Management Plans.

Construction Stormwater General Permit

The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by SWRCB, regulates construction activities that include clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities and requires all developers of land where construction activities will occur over more than one acre to do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies construction Best Management Practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction Stormwater General Permit, a project applicant must electronically file all permit registration documents with SWRCB prior to the start of construction. Permit registration documents must include a Notice of Intent, Risk Assessment, site map, SWPPP, annual fee, and signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control discharges from groundwater dewatering, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The Construction Stormwater General Permit also includes groundwater dewatering requirements for projects not covered under a De Minimis or Low Threat Discharge Permit. The dewatering requirements mandate dischargers to implement BMPs to control the volume and velocity of dewatering discharges. The Construction Stormwater General Permit also requires testing and treatment, if necessary, of groundwater discharge to verify the discharge meets or exceeds the effluent limitations specified in the permit.

Urban Water Management Planning Act

In 1983 the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an urban water management plan (UWMP) at least once every five years and submit them to the DWR. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24, commencing with Section 78500, or Division 26, commencing with Section 79000, or receive drought assistance from the state until the UWMP is submitted and deemed complete pursuant to the Urban Water Management Planning Act. As the water purveyor to the City of Pacific Grove, Cal-Am's 2020 UWMP would apply to the project area.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package signed into California state law in September 2014. SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for state intervention if necessary to protect the resource. SGMA requires that medium- and high-priority groundwater basins, as defined by DWR, are managed by local Groundwater Sustainability Agencies (GSAs) through implementation of Groundwater Sustainability Plans (GSPs) designed to achieve and maintain sustainable conditions. Adjudicated basins, such as the Seaside Groundwater Basin, are managed in accordance with a court-issued adjudication judgement which is administered by a court-approved Watermaster; the adjudication judgement and Watermaster serve the same purposes as a GSP and GSA, which are therefore not required for adjudicated basins under SGMA. However, SGMA requires Watermasters of adjudicated groundwater basins submit information to DWR annually on groundwater elevations, groundwater production, surface water supply used or available for groundwater recharge, total water use, and change in groundwater storage along with the annual report submitted to the court.

c. Regional and Local Regulations

Low Threat Discharge Permit

The Central Coast RWQCB has a general permit for discharges that pose a low threat to water quality (*Waste Discharge Requirements NPDES General Permit for Discharges with Limited Threat to Water Quality*; Order No. R3-2022-0035, NPDES No. CAG99304). Its provisions cover discharges of untreated wastewater streams that will not affect receiving water quality, including groundwater dewatering during excavation. This permit specifies the discharge prohibitions, receiving water limitations, and monitoring and reporting program requirements for discharges. Permittees are required to monitor their discharges to verify water quality standards are not exceeded.

Monterey Regional Stormwater Management Program

The County of Monterey and cities of Carmel-by-the-Sea, Del Rey Oaks, Monterey, Pacific Grove, Sand City and Seaside, are participating members of the Monterey Regional Storm Water Management Program. Participating members collaborate on projects and other Permit-related activities to satisfy a number of their individual Phase II MS4 General Permit requirements. The Monterey Regional Storm Water Management Program group sponsors a number of public education and public participation events each year, as well as a volunteer monitoring program that collects stormwater samples from storm drain outfalls throughout northern Monterey County. The group employs one full-time program manager who coordinates activities, manages consultant contracts, and keeps abreast of current issues within the stormwater community.

City of Pacific Grove Stormwater Requirements

The City of Pacific Grove enforces the following requirements for new and redevelopment projects within its jurisdiction, as required by the NPDES Permit No. R3-2013-0032 issued by the SWRCB:

- Single-family residences that create and/or replace between 2,500 and 15,000 square feet or more of impervious surface must prepare a Landscape Plan.
- Commercial or industrial projects that create and/or replace 5,000 square feet or more of impervious surface must prepare a Drainage and Stormwater Treatment and Control Plan.
- Any project that creates and/or replaces 22,500 square feet of impervious surface must submit a Stormwater Runoff Retention Plan.

Projects that would install 2,500 square feet of new or replaced impervious surfaces are required to implement low impact development (LID) site design measures. Projects that would install 5,000 net square feet of impervious surface or 15,000 net square feet for detached single-family residences are required to implement LID strategies and treat the 85th percentile, 24-hour storm.[2] Projects that would install 15,000 square feet of new or replaced impervious surface or 15,000 net square feet for detached single-family residences are required to retain stormwater from the 85th or 95th percentile, 24-hour storm. Projects that would install 22,500 square feet of new or replaced impervious surface are required to match the 2- to 10-year peak flows.

[2] The 85th percentile, 24-hour storm event is a statistical design storm defined through a hydrologic analysis of long-term rainfall records for a particular geographic area. The 85th percentile 24-hours storm event represents the 85th percentile 24-hour rainfall depth among all 24-hour rainfall depths evaluated in a historical record.

Water Quality Control Plan

The Central Coast RWQCB has adopted a *Water Quality Control Plan for the Central Coastal Basin* (Basin Plan; Central Coast RWQCB 2019) for their region of responsibility that delineates water resource area boundaries based on hydrological features. For the purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the surface waters and groundwater management zones described in the Basin Plan. Once beneficial uses are designated, appropriate water quality objectives are established, and programs that maintain or enhance water quality are implemented to ensure the protection of beneficial uses.

The Basin Plan also establishes implementation programs to achieve water quality objectives to protect beneficial uses and require monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State Antidegradation Policy (SWRCB Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

City of Pacific Grove Local Coastal Program

On March 11, 2020, the California Coastal Commission certified the City's adopted Local Coastal Program. Pacific Grove's Coastal Zone is comprised of approximately 458 acres of land and extends offshore three nautical miles from the mean high tide line. With minor exceptions, development within that zone requires issuance of a Coastal Development Permit. Development includes activities such as the construction of buildings, divisions of land, and some uses of land that change the intensity of use or public access to coastal waters. The City's Local Coastal Program contains background information and polices addressing coastal hazards and sea level rise (Section 2.1), water and marine resources (Section 2.2), and storm drainage (Section 3.4.8) that are related to the preservation of coastal resources.

City of Pacific Grove Municipal Code

Chapter 9.30 of the Pacific Grove Municipal Code sets forth standards for stormwater management and discharge control. Specifically, Section 9.30.130 requires appropriate BMPs to be implemented for construction activities to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects to minimize the generation, transport and discharge of pollutants. The City incorporates BMP requirements into land use entitlements and construction or building permits for development or redevelopment projects. The owner and developer are required to comply with the terms, provisions, and conditions of such land use entitlements and building permits as required in Section 9.30.130. These requirements may include a combination of structural and nonstructural BMP requirements to ensure the proper long-term operation and maintenance of these BMPs, including inspections and right of entry by City staff or agents to ensure compliance with the requirements of Chapter 9.30.130.

Section 9.30.170 grants the Public Works Director the right to mandate remediation of pollutants when a discharge of pollutants has occurred which will or has resulted in pollution of stormwater, the storm drain system, or waters of the United States. Pursuant to Section 9.30.230, if the Public Works Director has cause to believe a landowner or developer has failed to meet the requirements of Chapter 9.30, the Director may require a stop work order on construction activities until stormwater pollution is remediated to the satisfaction of the Director.

Pacific Grove ASBS Compliance Plan

The Pacific Grove ASBS is 3.2 miles of coastline adjacent to the City of Pacific Grove, entirely within the Monterey Bay National Marine Sanctuary, and overlapping with the Pacific Grove State Marine Conservation Area and Hopkins State Marine Reserve. The Pacific Grove ASBS is one of 34 SWRCB-designated ASBS areas along the California Coast. These areas are defined as "ocean areas requiring protection of species or biological communities to the extent that alteration of natural water quality is undesirable" (SWRCB Resolution No. 2012-0012). The California Ocean Plan establishes water quality objectives for California's ocean waters and provides the basis for regulation of point and non-point source discharges into the State's coastal waters. On March 20, 2012, the SWRCB adopted the "General Exception and Special Protections for the California Ocean Plan Waste Discharge Prohibition for Stormwater and Nonpoint Source Discharges" into the ASBS. The "Special Protections" have since been incorporated in the SWRCB's Order No. 2013-0001-DWQ, NPDES No. CAS000004 (refer to *Phase II Municipal Stormwater Permit*, above).

The Pacific Grove ASBS Compliance Plan is intended to fulfill requirements contained within the Phase II MS4 Permit. The Pacific Grove ASBS Compliance Plan provides a regulatory background to describe the fundamental provisions of the Special Protections for Beneficial Uses of ASBS. The Pacific Grove ASBS Compliance Plan describes the structural and non-structural BMPs (both existing and planned for the future) and summarizes the ASBS monitoring program. The report also includes a compliance and implementation schedule to achieve compliance with the Special Protections for Beneficial Uses of ASBS.

4.9.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The project's impacts related to hydrology and water quality are evaluated based on the project's adherence to local, state, and federal standards; the nature of proposed soil disturbance, construction activities, and groundwater dewatering during construction; changes in land use and proposed operational activities; changes in pre- and post-stormwater flows; and proposed operational BMPs for control of surface runoff and reduction of pollutants in stormwater runoff.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on hydrology and water quality if it would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface of ground water quality;
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
3. 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 that would:
    i. Result in substantial erosion or siltation on- or off-site,
    ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site,

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or

iv. Impede or redirect flood flows;

4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and/or
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HYD-1 THE PROJECT WOULD NOT VIOLATE WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUND WATER QUALITY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Development facilitated by the project would require ground-disturbing activities during construction, which would disturb on-site soils. Soil disturbance would increase the potential for erosion and sedimentation. If construction activities occur during the rainy season, or in the event of heavy storms, soils could be eroded and transported off-site or to downstream receiving waters. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported off-site via stormwater runoff to off-site areas, including the ASBS.

If development facilitated by the project requires demolition of existing structures, such activities have the potential to release pollutants to on-site soils, particularly if on-site structures contain asbestos, lead, or polychlorinated biphenyls. Demolition activities have the potential to release these pollutants to on-site soils, where they could then be transported off site in stormwater runoff during storm events. The Construction Stormwater General Permit, which applies to individual projects greater than one acre in size, includes requirements for projects to address demolition-related pollutants. In compliance with these requirements, the SWPPP would specify BMPs to control the discharge of pollutants associated with demolition, including polychlorinated biphenyls, asbestos, and lead. In addition, the Construction Stormwater General Permit requires dischargers to prevent exposing demolition debris to precipitation, and mandates demolition materials to be covered with an impermeable barrier prior to precipitation to prevent known contaminants from being mobilized. Compliance with the Construction Stormwater General Permit, including implementation of the required SWPPP and construction BMPs, would minimize pollutant discharge during demolition on sites greater than one acre in size. Additionally, as described in Section 4.8, *Hazards and Hazardous Materials*, under Impact HAZ-1, regulatory requirements for demolition of structures that may contain asbestos, lead, and/or polychlorinated biphenyls would minimize the potential for hazardous materials releases from construction activities. Therefore, demolition activities would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Some housing sites in the Downtown District (Site 9); Forest Hill Commercial District (Sites 21 and 29); Dennett, Sinex, and Grove Acre Neighborhood (Site 39); Other Areas (Sites 47, 49, 50, 53, 55, and 56); and additional parcels (Sites A10 and A11) are greater than one acre in size. Construction projects that disturb one acre or more of soil are subject to the requirements of SWRCB's Construction Stormwater General Permit, which requires preparation and implementation of a SWPPP to control the discharges of pollutants, including sediment, into surface water drainages. Development facilitated by the project on sites greater than one acre would be required to obtain coverage under the Construction Stormwater General Permit and prepare and implement a SWPPP that specifies the stormwater monitoring and construction BMPs required to reduce pollutants in stormwater runoff. Construction BMPs would include, but not be limited to, erosion control BMPs and sediment control BMPs designed to minimize erosion and retain sediment on site and good housekeeping BMPs to prevent spills, leaks, and off-site discharge of construction debris and waste.

The remaining housing sites are less than one acre in size. Because construction on these sites would disturb less than one acre, future development would be exempt from the requirements of the Construction Stormwater General Permit. However, Chapter 9.30 of the Pacific Grove Municipal Code would apply to these projects, as it would with all development facilitated by the project, regardless of acreage. Section 9.30.130 requires developers to implement BMPs for construction activities to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects to minimize the generation, transport, and discharge of pollutants. Furthermore, Chapter 9.30 grants the City Public Works Director the authority to stop work on construction activities and require stormwater pollution remediation prior to the continuation of construction. Existing City requirements would ensure construction that disturbs less than one acre would minimize the pollution of stormwater.

While the project does not overlie a DWR-defined groundwater basin, local areas of shallow or perched groundwater may be present and could be encountered during excavation activities. If groundwater is encountered during construction of development facilitated by the project, dewatering of the work area would be required. Water removed from the work area may be discharged into the City's stormwater system as part of the dewatering process, and coverage under the City's Low Threat Discharge Permit would be required. This would involve groundwater testing and treatment, as necessary, prior to its release into surface waters to prevent exceedances of effluent limitations. As a result, groundwater dewatering during excavation activities would not introduce pollutants to receiving waters or violate water quality standards or waste discharge requirements.

Compliance with the Construction Stormwater General Permit requirements and Pacific Grove Municipal Code requirements, as well as implementation of required construction BMPs pursuant to a SWPPP and/or the City, would minimize pollutant discharge in stormwater runoff. In addition, because the project area discharges to the ASBS, the Pacific Grove ASBS Compliance Plan mandates weekly inspection of construction sites by City officials to ensure adequate stormwater management measures are implemented. Therefore, construction of development facilitated by the project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant.

Operation

The project would facilitate the development of residential and mixed-use projects on identified housing sites, upzoning areas, and additional parcels. Pollutants associated with residential and commercial development include household garbage, household products, fertilizers, cleaning

products, electronic waste, and food waste. Pollutants carried off site during storm events would be conveyed by the existing drainage infrastructure in the city, including gutters and storm drain infrastructure, which eventually drains to the ASBS and could degrade the water quality in the ASBS.

Development facilitated by the project would be required to comply with the Phase II MS4 Permit and City of Pacific Grove stormwater requirements. Development facilitated by the project would be required to implement LID site design measures related to the creation or replacement of impervious surfaces, pursuant to City of Pacific Grove stormwater requirements that ensure compliance with NPDES Permit No. R3-2013-0032. These site design measures may include, but are not limited to, use of porous pavement, vegetated swales, green roofs, rain barrels and cisterns, tree planting, source control, runoff reduction, stormwater treatment, and hydromodification management (SWRCB 2013: 50-51). This includes the implementation of Source Control and LID BMPs. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into stormwater. LID BMPs are implemented to mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, and detain runoff rather than allowing runoff to flow directly to piped or impervious storm drains. LID BMPs must retain 85th percentile 24-hours storm event flows. BMPs target and reduce pollutants of concern from stormwater runoff from a site in compliance with the Phase II MS4 Permit and City of Pacific Grove stormwater requirements. Compliance with permit requirements, including incorporation of operational BMPs into project design to target pollutants of concern, would minimize pollutant discharge during operation, thus reducing the potential for increased conveyance of pollutants into receiving water bodies, including the ASBS.

Therefore, operation of future development facilitated by the project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and the impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HYD-2 THE PROJECT WOULD NOT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROJECT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF THE BASIN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.9.1b, the project area does not overlie a groundwater basin. Therefore, although development facilitated by the project may increase impervious surfaces, the increase of impervious surfaces would not interfere with existing rates or patterns or groundwater recharge. As described in Impact HYD-1, in the event that temporary dewatering is required due to the presence of shallow or perched groundwater, it would be conducted in accordance with the requirements of the Low Threat Discharge Permit, and water removed from the work area may be discharged to the City's stormwater system. Shallow or perched groundwater tends to occur from the accumulation of rainwater in areas with poor infiltration or where an impermeable layer prevents infiltration to an underlying groundwater basin. As noted above, the project area is not underlain by a defined groundwater basin; any presence of shallow or perched groundwater would be localized and not connected to the recharge of a groundwater basin. The removal of shallow or perched groundwater

from excavation areas would not interfere with groundwater supply, recharge, or sustainable management.

Water supply for future development facilitated by the project would be provided by Cal-Am in accordance with regulatory permits and entitlements held by Cal-Am for surface water and groundwater resources within its Monterey Main system. As detailed in Section 4.16, *Utilities and Service Systems*, Cal-Am's supply portfolio for the Monterey Main system includes the following sources (Cal-Am 2021a):

- Carmel River Aquifer (3,376 AFY)
- Seaside Groundwater Basin (1,474 AFY until 2030, then 774 AFY)
- Aquifer Storage and Recovery (ASR) Program (920 AFY)
- Pure Water Monterey (PWM) Project (3,500 AFY)
- Sand City Desalination Plant (94 AFY)
- Monterey Peninsula Water Supply Project (MPWSP) Ocean Desalination Plant (6,252 AFY once operational in 2030)
- PWM Expansion Project (2,250 AFY).

As listed above, the groundwater components of Cal-Am's supply portfolio include the Carmel River Aquifer and the Seaside Groundwater Basin. Use of water from the Carmel River Aquifer is controlled by the SWRCB's Order WR 95-10, which limits Cal-Am's diversions to 3,376 AFY consistent with pre-1914 appropriative rights, riparian rights, and License #0011866 (Cal-Am 2021a: 6-2). Similarly, use of water from the Seaside Groundwater Basin is controlled by a 2006 adjudication judgment, which limits Cal-Am's entitled right to 1,474 AFY and requires pumping to be reduced by 700 AFY for at least 25 years, once another reliable water supply source is available; in accordance with this requirement, Cal-Am will reduce its pumping to 774 AFY in 2030, when the MPWSP Ocean Desalination Plant is anticipated to come online (Cal-Am 2021a: E-4). Additional information related to water supply availability for development facilitated by the project is provided in Section 4.16, *Utilities and Service Systems*.

Compliance with the existing regulatory conditions governing groundwater use in the project area ensures that the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The SWRCB Order WR 95-10 and the Seaside Groundwater Basin adjudication judgment are both designed to restore and maintain sustainable conditions in the Carmel River Aquifer and the Seaside Groundwater Basin, respectively. As such, continued compliance with these requirements supports sustainable groundwater conditions in the future, including with future development facilitated by the proposed project. Therefore, groundwater resources would be protected from overuse regardless of the water shortage conditions present in the project area.

Because the project area is not underlain by a defined groundwater basin, the nominal addition of impervious surfaces in the project area would not interfere with the recharge of a groundwater basin. The removal of shallow or perched groundwater in the project area would not interfere with groundwater supply, recharge, or sustainable management of a groundwater basin. Development facilitated by the project would not decrease groundwater supplies or interfere with sustainable groundwater management. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3.i: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Impact HYD-3 THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON OR OFF SITE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Development facilitated by the project would require ground-disturbing activities during construction, which could contribute to erosion through the exposure of bare soils. The project area is largely urbanized and lacks streams or rivers which construction could alter. As discussed in Impact HYD-1, construction activities for development facilitated by the project would disturb sites ranging from less than one acre to greater than five acres in size. Construction activities for developments greater than one acre would be required to comply with the Construction Stormwater General Permit. The Construction Stormwater General Permit requires preparation and implementation of a SWPPP and implementation of erosion control BMPs and sediment control BMPs designed to minimize erosion and retain sediment on site and good housekeeping BMPs to prevent spills, leaks, and off-site discharge of construction debris and waste. Regardless of individual site size, construction activities for development facilitated by the project would be required to comply with the stormwater control requirements of Chapter 9.30 of the Pacific Grove Municipal Code, which requires developers to implement BMPs for construction activities to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects to minimize the generation, transport, and discharge of pollutants. Furthermore, Chapter 9.30 grants the City Public Works Director the authority to stop work on construction activities and require stormwater pollution remediation prior to the continuation of construction. These regulations would ensure construction of development facilitated by the project would not substantially alter the existing drainage pattern of housing sites in a manner that would result in on or substantial erosion or siltation on- or off-site. This impact would be less than significant.

Operation

Development facilitated by the proposed project could increase impervious surfaces, which may alter the existing drainage patterns of identified housing sites, upzoning areas, and alternative parcels. Many of the identified housing sites, upzoning areas, and alternative parcels have already been developed and contain some amount of existing impervious surfaces. An increase of impervious surfaces could result in an increased volume of stormwater runoff that can lead to downstream erosion in receiving waters, including the ASBS.

As described in Impact HYD-1, development facilitated by the project would be required to comply with the requirements of the Phase II MS4 Permit and City of Pacific Grove stormwater requirements. Development facilitated by the project would be required to implement site design measures related to the creation or replacement of impervious surfaces. These site design measures may include, but are not limited to, use of porous pavement, vegetated swales, green roofs, rain barrels and cisterns, tree planting, source control, runoff reduction, stormwater treatment, and

hydromodification management (SWRCB 2013: 50-51). This includes the implementation of Source Control and LID BMPs. Compliance with the requirements of the Phase II MS4 Permit would minimize the potential for stormwater runoff from individual sites to increase downstream erosion or siltation. Therefore, the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3.ii:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Impact HYD-4 THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD RESULT IN FLOODING ON OR OFF SITE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Development facilitated by the project would require ground-disturbing activities during construction; however, the project area is largely urbanized and lacks streams or rivers which construction could alter, thus leading to flooding on or off site. As discussed in Impact HYD-1, construction of development facilitated by the project would comply with the requirements of the Construction Stormwater General Permit and/or Pacific Grove Municipal Code requirements, including construction BMPs to control and direct on-site surface runoff to ensure substantial flooding would not occur. As described in Section 4.9.1c, the project area is located within Zone X, which indicates an area of minimal flood hazard (FEMA 2024). Therefore, the project area is not subject to flood flows. With implementation of BMPs, development facilitated by the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on or off site. This impact would be less than significant.

Operation

Development facilitated by the proposed project could increase impervious surfaces, which may alter the existing drainage patterns of identified housing sites, upzoning areas, and alternative parcels. However, as indicated in Section 4.9.1(c), *Flooding and Inundation*, the project area is designated as Zone X and has a very low risk of flooding. The project area is largely urbanized and lacks streams or rivers which development facilitated by the project could alter, thus leading to flooding on or off site. As discussed in Impact HYD-1, development facilitated by the project would be required to comply with the requirements of the Phase II MS4 Permit, and City of Pacific Grove stormwater requirements, including implementation of LID BMPs. LID BMPs are implemented to mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, and detain runoff rather than allowing runoff to flow directly to piped or impervious

storm drains. Development facilitated by the project would comply with the requirements of the Phase II MS4 Permit and implement BMPs to collect, store, and convey stormwater runoff on the project site so that substantially increased flooding would not occur during storm events. Therefore, compliance with the Phase II MS4 Permit would ensure the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on or off site. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3.iii:	Would the project 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 that would 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?

Impact HYD-5 THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

The project area is largely urbanized and lacks streams or rivers which construction could alter. As discussed in Impact HYD-1, construction of development facilitated by the project would comply with the requirements of the Construction Stormwater General Permit and/or Pacific Grove Municipal Code requirements, including construction BMPs to control the volume, rate, and potential pollutant load of stormwater runoff. With implementation of BMPs, development facilitated by the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This impact would be less than significant.

Operation

Pollutants associated with residential and commercial development include household garbage, household products, fertilizers, cleaning products, electronic waste, and food waste. Pollutants carried off site during storm events could degrade the water quality in the ASBS. As discussed in Impact HYD-1, development facilitated by the project would be required to comply with the requirements of the Phase II MS4 Permit and City of Pacific Grove stormwater requirements. Development facilitated by the project would also be required to implement site design measures related to the creation or replacement of impervious surfaces. These site design measures may include, but are not limited to, use of porous pavement, vegetated swales, green roofs, rain barrels and cisterns, tree planting, source control, runoff reduction, stormwater treatment, and hydromodification management (SWRCB 2013: 50-51). Compliance with NPDES requirements, including incorporation of operational BMPs into project design to target pollutants of concern,

would minimize pollutant discharge during operation. Implementation of requirements and BMPs would ensure the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces. In particular, implementation of requirements and BMPs would ensure that drainage patterns are not altered in a manner which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3.iv:	Would the project 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 impede or redirect flood flows?

Impact HYD-6 THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS. NO IMPACT WOULD OCCUR.

As described in Section 4.9.1c, the project area is located within Zone X, which indicates an area of minimal flood hazard (FEMA 2024). Therefore, the project area is not subject to flood flows, and the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. No impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 4:	In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HYD-7 THE PROJECT WOULD NOT RISK THE RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION IN FLOOD HAZARD, TSUNAMI, OR SEICHE ZONES. NO IMPACT WOULD OCCUR.

The identified housing sites, upzoning areas, and additional parcels are not located within a flood hazard, tsunami, seiche, or dam inundation zone. Therefore, development facilitated by the project would not have the potential to risk release of pollutants due to inundation. No impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 5:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-8 THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Water Quality Control Plans

The Basin Plan and Pacific Grove ASBS Compliance Plan are the water quality control plans applicable to the project area. The Basin Plan defines beneficial uses, sets forth water quality objectives, and establishes programs to manage the quality of surface water and groundwater and achieve those water quality objectives for protection of beneficial uses. The Pacific Grove ASBS Compliance Plan aims to improve stormwater quality prior to discharge in the ASBS.

As described in in Impact HYD-1, development facilitated by the project would comply with regulations such as the Phase II MS4 Permit, Construction Stormwater General Permit, and/or Pacific Grove Municipal Code, each of which require the implementation of BMPs in order to minimize potential water quality impairments associated with the construction and operation of new development. These BMPs would minimize water quality impacts, maintain beneficial uses described in the Basin Plan, and maintain the water quality of the ASBS in accordance with the Pacific Grove ASBS Compliance Plan. Therefore, the project would not conflict with or obstruct implementation of the Basin Plan or Pacific Grove ASBS Compliance Plan. This impact would be less than significant.

Sustainable Groundwater Management Plan

The project area does not overlie a DWR-defined groundwater basin and is not within the management area of any GSP for SGMA compliance (see Section 4.9.2 under "Sustainable Groundwater Management Act"). As discussed under Impact HYD-2 and detailed in Section 4.16, *Utilities and Service Systems*, Cal-Am holds entitlements to 1,474 AFY of groundwater from the adjudicated Seaside Groundwater Basin, of which it will reduce pumping to 774 AFY in 2030, consistent with the adjudication judgement requirements to reverse overdraft and restore sustainable conditions. Cal-Am also holds entitlements to 3,376 AFY of water from the Carmel River Aquifer, consistent with pre-1914 appropriative rights, riparian rights, and License #0011866 (Cal-Am 2021a: 6-2), with use controlled by the SWRCB's Order WR 95-10. Cal-Am's use of groundwater is conducted in compliance with applicable regulatory requirements and restrictions, in support of sustainable groundwater management. The proposed project would not conflict with or obstruct the implementation of any sustainable groundwater management plan. No impact would occur.

Mitigation Measures

No mitigation is required.

4.9.4 Cumulative Impacts

The geographic scope for cumulative hydrology and water quality impacts is the Monterey Peninsula Hydrologic Area (for surface water-related impacts), and the area which is provided groundwater from the Seaside Groundwater Basin (for groundwater-related impacts). The Monterey Peninsula Hydrologic Area is an appropriate geographic scope for surface water-related cumulative impacts because surface water quality impacts are localized in the watershed where the impact occurs and may influence the Pacific Grove ASBS. The area which is provided groundwater from the Seaside Groundwater Basin is an appropriate geographic scope for groundwater-related cumulative impacts because groundwater impacts related to sustainable management are influenced by cumulative development which relies on the Seaside Groundwater Basin for water supply. Regional cumulative impacts consider impacts that would occur from the buildout of cumulative planning documents and reasonably anticipated projects identified in Chapter 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this DEIR is discussed in Chapter 3, *Environmental Setting*.

Cumulative development would generally increase impervious surfaces, which could increase peak flood flows, alter drainage patterns, and increase pollutants in regional stormwater. However, cumulative development would be required to adhere to applicable regulations designed to control erosion, stormwater flows, and protect water quality, including, but not limited to, coverage under the Construction Stormwater General Permit, adherence to Phase II MS4 Permit requirements, and compliance with applicable Municipal Code requirements. Compliance with these applicable regulations would require each individual project to incorporate BMPs and other drainage facilities designed to address drainage and surface water quality protection. As a result, cumulative impacts to surface and ground water quality, erosion or siltation, flooding, and polluted runoff (Thresholds 1, 3.i, 3.ii, 3.iii, and 5) would be less than significant.

As described in Impact HYD-6 and Impact HYD-7, the project area is not located within a floodplain and therefore the project would result in no impact related to flood flows or inundation in a flood hazard zone. Accordingly, the project has no potential to contribute to cumulative impacts related to flood hazard areas, and these impacts are not discussed further (Thresholds 3.iv and 4).

Similar to development facilitated by the project, cumulative development in areas that do not overlie the Seaside Groundwater Basin would not directly impact groundwater recharge. Additional water demand would occur with population growth associated with cumulative development; however, no increased use of groundwater from the Carmel River Aquifer or Seaside Groundwater Basin would occur. In addition, as discussed under Impact HYD-2 and detailed in Section 4.16, *Utilities and Service Systems*, Cal-Am's use of Seaside Groundwater Basin will reduce by 700 AFY for at least 25 years beginning in 2030, when Cal-Am's supply portfolio will expand with the MPWSP Ocean Desalination Project is anticipated to come online. Although cumulative development would increase water demands and there are projected supply shortage conditions detailed in Cal-Am's 2020 UWMP, shortage conditions will be addressed through ongoing implementation of the WSCP demand reduction actions, and will not affect local groundwater resources managed through regulatory permits and adjudication. Therefore, cumulative impacts related to groundwater resources would be less than significant (Thresholds 2 and 5).

4.10 Land Use and Planning

This section analyzes the consistency of the proposed project with applicable land use plans, policies, and regulations, and identifies environmental effects that would arise from such inconsistencies.

4.10.1 Setting

a. Established Land Uses

Pacific Grove is almost fully built out with a total population of 14,966 persons as of January 2024 (California Department of Finance 2024), within an area of about 2.9 square miles. The primary land uses in the city are open spaces and residential uses. Commercial, industrial, and public or institutional uses are also present throughout the project area. Table 2-4 through Table 2-10 in Chapter 2, *Project Description*, provide the existing zoning and land use designations of identified housing sites, upzoning areas, and additional parcels in the project area. Table 4.10-1 provides the total acreages of each existing land use designation within the project area.

Table 4.10-1 Existing Land Uses within the Project Area

	Planning Area Total	
Land Use	**Acres**	**Percent of Total**
Residential	838.2	45.8
Parks/Open Space	341.9	18.7
Public/Private Facilities	120.8	6.6
Commercial	92.5	5.0
Other (including vacant land)	436.6	23.9
Total	**1,830.0**	**100.0**

Source: City of Pacific Grove 1994

Residential

Residential land uses are the most prevalent land use in Pacific Grove, occupying approximately 45.8 percent of the project area. Most of the residential development in the city is in the form of detached, single-family tract homes that are located in subdivisions built in the last half-century. Higher density housing occupies approximately nine percent of the land uses and is generally concentrated in the eastern corner of the city adjacent to much of the commercial space within the project area. This multi-family housing primarily consists of apartments, townhomes, condominiums, and duplex-style housing. There is also one mobile home park located along Ocean View Boulevard along the northeastern edge of the city.

Parks/Open Space

Open space occupies approximately 18.7 percent of the project area. Approximately 88 percent of open space areas are accessible to the public. Most of the open space is managed by the Pacific Grove Recreation Department. The city's open space areas include parks and recreational facilities, a golf course located in the northwestern portion of the city, a cemetery, and the Asilomar State Marine Reserve located along the northwestern edge of the city.

Public/Private Facilities

Public/Private facilities cover approximately 6.6 percent of the project area and include government-owned facilities, public and private school facilities, and public utilities.

Commercial

Commercial development occupies approximately five percent of the project area and is mostly clustered along Lighthouse Avenue in the center of the project area and Sunset Drive/Forest Avenue in the southern portion of the project area. Commercial uses in these areas include restaurants, hotels, offices, and personal services (e.g., salons).

Other Land

Other land covers approximately 23.9 percent of the project area. Twelve (12) acres of this land is occupied by churches, 31.8 acres of this land is vacant, 390.4 acres of this land are city streets, and 2.4 acres of this land is occupied by miscellaneous uses.

4.10.2 Regulatory Setting

a. State Regulations

Planning and Zoning Law

State law requires each city and county in California to adopt a general plan for the physical development of the land within its planning area (Government Code Sections 65300-65404). The general plan must contain land use, housing, circulation, open space, conservation, noise, safety, and environmental justice elements, as well as any other elements that the city or county may wish to adopt. The circulation element of a local general plan must be correlated with the land use element.

Zoning authority originates from city and county police power and from the state's Planning and Zoning Law, which sets minimum requirements for local zoning ordinances. The city or county zoning code is the set of detailed requirements that implement the general plan policies at the level of the individual parcel. The zoning code presents standards for different uses and identifies which uses are allowed in the various zoning districts of the jurisdiction. Since 1971, state law has required the city or county zoning code to be consistent with the jurisdiction's general plan.

Housing Accountability Act

The Housing Accountability Act was passed in 1982 in recognition that "the lack of housing, including emergency shelters, is a critical problem," and "among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration." The Housing Accountability Act removes barriers to infill housing development projects by expediting housing approvals, and prevents local agencies from disapproving housing development projects for very low-, low-, or moderate-income households except in limited circumstances. On September 29, 2017, Governor Brown signed Senate Bill (SB) 167, Assembly Bill (AB) 1515, and AB 678 to amend the Housing Accountability Act to further limit a local agency's ability to disapprove or reduce the density of residential projects. In 2023, Governor Newsom signed AB 1633, which *inter alia* gives project developers the ability to challenge a local government's decision to deny the use of a CEQA exemption for eligible infill development projects.

In 2024, Governor Newson signed AB 1893 to amend the Housing Accountability Act to apply site restrictions density limits, and other requirements to new projects after January 1, 2025, and signed AB 1886 to foreclose several legal arguments used in opposition of "Builder's Remedy" projects.

Senate Bill 330, Housing Crisis Act

SB 330 took effect in 2019 and declared a statewide housing emergency to be in effect until January 1, 2025. SB 8 was signed in 2021 to extend the provisions of SB 330 until January 1, 2030. SB 330 prohibits cities and counties from the following actions:

- Establishing rules that would change the land use designation or zoning of parcels to a less intensive use or reducing the intensity of the land that was allowed under the specific or general plan as is in effect on January 1, 2018;
- Imposing or enforcing a moratorium on housing development within all or a selection of the local agency's jurisdictions;
- Imposing or enforcing new design standards established on or after January 1, 2020, that are not objective design standards;
- Establishing or implementing limits on permit numbers issued by the local agency unless the limit was approved before January 1, 2005, in a "predominantly agricultural county."

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act (SB 375) supports the state's climate goals by helping reduce greenhouse gas emissions through coordinated transportation, housing, and land use planning. Under the Act, the California Air Resources Board set targets for 2020 and 2035 for each of the 18 metropolitan planning organization regions in 2010 and updated them in 2018. Each of the regions must prepare a Sustainable Communities Strategy (SCS), as an integral part of its regional transportation plan, that contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet the California Air Resources Board's targets. The Act establishes some incentives to encourage implementation of the development patterns and strategies included in an SCS. Developers can get relief from certain environmental review requirements under the California Environmental Quality Act (CEQA) if their new residential and mixed-use projects are consistent with a region's SCS that meets the targets (see Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28).

California Coastal Act

The City of Pacific Grove is mandated by the California Coastal Act of 1976 (Public Resources Code Section 30000 *et seq*.) to prepare a Local Coastal Program (LCP) for the areas of the city that are located within the Coastal Zone boundary. A LCP consists of City land use plans and land use controls that implement the provisions of the California Coastal Act. The California Coastal Act is intended to "protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources." Development in the Coastal Zone requires a coastal development permit, which is issued by the City or the California Coastal Commission, in compliance with the LCP, for proposed development that occurs within the city's Coastal Zone (City of Pacific Grove 2020).

The City of Pacific Grove adopted its LCP on January 15, 2020, and the LCP was certified by the California Coastal Commission on March 11, 2020. The LCP consists of a land use plan, policies, and implementing zoning ordinance applicable to areas in the Coastal Zone (PGMC Chapter 23.90).

b. Regional and Local Regulations

Association of Monterey Bay Area Governments 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy

The Association of Monterey Bay Area Governments (AMBAG) is the Metropolitan Planning Organization that includes the counties of Monterey, Santa Cruz, and San Benito and all incorporated cities therein. The 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), approved by the AMBAG Board of Directors in June 2022, is a comprehensive planning effort that coordinates land use patterns and transportation investments with the objective of developing an integrated, multimodal transportation system. The MTP/SCS is built on a set of integrated policies, strategies, and investments to maintain and improve the transportation system to meet the diverse needs of the region through 2045. The 2045 MTP/SCS describes where and how the region can accommodate the projected 42,000 more households and 65,500 new jobs between 2020 and 2045 and details the regional transportation investment strategy over the next 25 years.

The 2045 MTP/SCS contains six goals to address major challenges in the region and has established fifteen performance measures to measure how well the 2045 MTP/SCS performs.

To better analyze land use patterns and consider scenario alternatives, AMBAG created a set of place types which established a set of land use designations common to general plans for the three counties and 18 cities in the region, including Pacific Grove. The assignment of place types was based primarily on existing land use designations, transit service maps and aerial imagery, but also relied upon information from local jurisdictions. The Place Type maps and designations of residential building intensities are included in Appendix I[1] of the 2045 MTP/SCS (AMBAG 2022). The 2045 MTP/SCS place types and designations applicable to Pacific Grove include:

- **Single-Family Residential:** Single-family homes in self-contained residential neighborhoods.
- **Multi-Family Residential:** Duplexes, apartment complexes, subdivided houses, and mobile home parks in a generally low-density setting.
- **Neighborhood Commercial:** Stand-alone retail buildings, strip malls, local-serving big-box stores, and smaller-scale offices or office parks.
- **Regional Commercial:** Large-scale retail or entertainment uses with a regional draw, including shopping malls, big-box stores, and tourist destinations.
- **Employment Center:** Office and research-oriented industrial land uses with medium to high employment densities.
- **Neighborhood Mixed Use:** Multi-family, mixed-use developments with ground-floor, neighborhood serving retail, medical, office or mixed uses. Usually found in newly built traditional neighborhood developments or as infill along existing commercial corridors.
- **Town Commercial:** Pedestrian-oriented commercial uses in town core commercial areas or along commercial corridors. Usually in areas with traditional street patterns.
- **Industrial/Manufacturing:** Various industrial and manufacturing uses, including factories, storage facilities, industrial and commercial suppliers, and some research and development uses.
- **Institutional/Civic:** Various institutional, civic, public, educational, hospital, cemeteries, and utilities uses located in various settings.

[1] https://ambag.org/sites/default/files/2021-11/Appendix%20I_%20SCSMaps_rev2_res_PDF-A.pdf

City of Pacific Grove General Plan

The City of Pacific Grove adopted the current General Plan in 1994. The General Plan serves as the principal policy document guiding future conservation and development of the city, as guided by development policies included within the General Plan. The General Plan's policies address land use, housing, transportation, parks and recreation, natural resources, historic and archaeological resources, urban structure and design, public facilities, and health and safety.

The project would involve amending the Land Use Element of the City's General Plan, and revisions are proposed for Policy 2, Goal 3, and other Land Use Element goals and policies. All proposed revisions are shown in Appendix B. Applicable policies from the existing and current Land Use Element are included below.

Land Use Element

The Land Use Element of the Pacific Grove General Plan discusses historic land use patterns and guidelines for future development in the city. The following goals and policies included in the existing Land Use Element are applicable to the proposed project:

Goal 1. Provide for orderly, well-planned, and balanced development consistent with the historic nature of Pacific Grove, the capacity of the City's infrastructure, and ability to assimilate new growth.

Goal 2. Repair and upgrade the City's infrastructure.

- **Policy 1.** Seek to preserve Pacific Grove's traditional "hometown" qualities.
- **Policy 1.5.** Protect Pacific Grove's residential character by prohibiting the short-term (less than 30 consecutive calendar days) rental of residential property in residential zoning districts, except to the extent such use is allowed in the Coastal Zone under the Local Coastal Program. The Pacific Grove Municipal Code shall be consistent with this Policy.
- **Policy 2.** Ensure that new development is compatible with adjacent existing development.
- **Policy 4.** Continue to preserve Pacific Grove's character and regulate development so as not to overburden the City's infrastructure.
- **Policy 5.** Avoid creating land divisions that result in lots smaller than prevailing lot sizes in the neighborhood, or which are inconsistent with the configuration of surrounding lots.
- **Policy 8.** View more favorably those land divisions where existing buildings with historic or architectural significance are retained and/or improved rather than demolished.

Goal 3. Designate land in commercial and office categories adequate to provide mixed-use development to support a range of goods and services and higher-density residential opportunities to meet the needs of Pacific Grove.

- **Policy 11.** Ensure that commercial uses are balanced, and that business and industry are compatible with the city's residential character.
- **Policy 12**. Promote and maintain a healthy local economy while preserving the local community character.
- **Policy 16.** Promote Pacific Grove businesses and industries.

Goal 4. Maintain strong and stable sources of City revenues while promoting an appropriate balance of land uses in the city.

- **Policy 15.** Encourage land uses that generate revenue to the City while maintaining a balance with other community needs, such as housing, open space, and recreation.

Goal 5. Enhance the appearance of Downtown.

- **Policy 20.** Focus City and private efforts on improvements in a comprehensive strategy to enhance Downtown.
- **Policy 22.** Review and revise height and story limits to maintain compatibility of new and remodeled buildings with the existing character of Downtown.
- **Policy 27.** Encourage new residential uses in the Downtown, but limited to the upper stories of new and existing buildings.

City of Pacific Grove Local Coastal Program

As discussed above under "California Coastal Act," the City adopted its LCP in January 2020. The LCP, which is comprised of the Pacific Grove Land Use Plan and Implementation Plan, governs land use and development in the Pacific Grove Coastal Zone. The Coastal Zone is made up of approximately 458 acres in the northern tip of the city and extends offshore three nautical miles from the mean high tide line. In the northeast portion of the city, the Coastal Zone boundary generally follows Central Avenue, with areas north of Central Avenue located in the Coastal Zone.

The Land Use Plan of the LCP indicates the kinds, location, and intensity of land uses permitted within the Coastal Zone, and includes policies for resource protection. The following goals and policies included in the Land Use Plan are applicable to the proposed project:

Water and Marine Resources

- **MAR-1.** Protect the City of Pacific Grove's marine, coastal and tideland resources, including the waters and habitats of the Pacific Grove Area of Special Biological Significance, California State Marine Reserves and State Marine Conservation Areas, the Monterey Bay National Marine Sanctuary, and the California Coastal National Monument, all of which are vital to the community's environmental, economy and special character. The City will continue to work with the California Department of Fish and Wildlife, the National Oceanic and Atmospheric Administration, and the Bureau of Land Management in developing and maintaining a coordinated approach for enforcing federal, state, and local regulations protecting these unique areas.
- **MAR-2.** Wetlands including Crespi Pond and the Majella Slough riparian area shall be considered Environmentally Sensitive Habitat Areas, and governed by Coastal Act policies 30233, and 30240. No alteration of freshwater wetlands (including Crespi Pond and Majella Slough) shall be allowed, except for maintenance dredging and similar activities essential for restoration and/or enhancement of natural habitats, as well as other uses and development specified in the Biological Resources and Environmentally Sensitive Habitat Areas chapter of this Land Use Plan, and only where there is no feasible less environmentally damaging alternative and where feasible mitigation measures have been provided to minimize adverse environmental effects.

- **MAR-3.** To reduce the potential for degradation or impairment of water quality, including the Pacific Grove Marine Gardens State Marine Conservation Area and Area of Special Biological Significance, the City will continue to investigate and implement new measures to reduce potential pollutants in storm water and irrigation runoff and require the following:
  - No diking, filling, dredging, or other uses inconsistent with the terms of the grant of tidal protection from the State of California or Coastal Act Policy 30233 shall be allowed in the City's tidelands.
  - Development shall include specific measures to help reduce potential pollutants and water quality impairment, including controlling the disposal of chemicals and hazardous materials, controlling the use of pesticides and herbicides, maintaining existing storm water capture programs, applying low impact development designs and requiring on-site retention and/or reuse of runoff.
  - The City will utilize ecologically responsible pest control methods and integrated pest management to the extent feasible on public property and encourage this practice on private property.
  - Drainage plans and erosion, sediment and pollution control measures shall be required as conditions of approval of every application for new development that has the potential to impair water quality.
  - Development that has the potential for water quality impairment shall, at a minimum, be designed to meet National Pollutant Discharge Elimination System stormwater runoff requirements.
  - Construction phase storm water pollutant controls shall be required for development that has the potential for water quality impairment, including erosion controls, sediment traps and filtering of off-site storm water flows, capture of site-generated pollutant sources, street sweeping of dirt tracked offsite, litter control, post-construction monitoring, and other best management practices. Construction-phase water quality impacts shall be avoided by minimizing the disturbed area, phasing grading activities, implementing soil stabilization and pollution prevention measures, and preventing unnecessary soil compaction.
- **MAR-7.** Development shall minimize to the extent practicable new impervious surfaces, especially impervious areas directly connected to water and marine resources, and, where feasible, increase the area of pervious surfaces in re-development to reduce runoff.
- **MAR-8.** Plan, site, and design development in a manner that maintains or enhances on-site infiltration, reduces runoff, minimizes the transport of pollutants in runoff generated from the development, and recharges groundwater. Runoff shall be appropriately collected, filtered, and treated by Best Management Practices (BMPs) to minimize pollutant loading to the maximum degree feasible.

Scenic Resources

- **SCE-1.** Public views to and along the shoreline shall be protected and enhanced, and alteration of natural landforms shall be minimized.
- **SCE-2.** Preserving and enhancing the scenic qualities of the Coastal Zone is a priority in all City actions and decisions. Development that could adversely impact public views and scenic coastal areas shall only be allowed where it protects, preserves, and, if feasible, enhances such scenic and visual qualities.

- **SCE-5.** The City will designate scenic areas of the Coastal Zone, including those areas described in Policy SCE-3, as areas having special scenic significance requiring the imposition of project-specific development standards designed to protect these scenic areas (refer to Figure 4, Scenic Areas).

  Development standards for such special scenic significance areas shall include, but not be limited to, special siting and design criteria including height and story limitations, bulk and scale limitations, screening and landscaping requirements, natural materials and color requirements, minimizing lighting that spills into nighttime public views, avoiding glares from windows and reflective surfaces, requirements to prepare landscaping plans utilizing drought tolerant and native plants that protect and enhance scenic resources; minimizing land coverage, grading, and structure height; and maximizing setbacks from adjacent open space areas. Clustering to maximize open space views may also be considered.

  Development within visually prominent settings, including those identified on Figure 4, and on all parcels that abut Ocean View Boulevard and Sunset Drive, shall be sited and designed to avoid blocking or having a significant adverse impact on significant public views, including by situating buildings, access roads, and related development in a manner and configuration that maximizes public viewshed protection, and through such measures as height and story limitations, and bulk and scale limitations. Clustering development to maximize open space views may also be considered.

Community Design

- **DES-1.** All new development shall be consistent with requirements of the certified Local Coastal Program, including the certified Land Use Designations figure (Figure 6).
- **DES-2.** Residential densities, except for allowable second units, shall not exceed those specified on the Land Use Designations figure.

  All residential development shall be sited and designed to be low scale, provide appropriate building articulation, and to avoid dominating blue water ocean views or domineering over other development in the adjacent vicinity. Building heights shall be limited to 25 feet in height, except that residential development within Areas I and II in Figure 6 may be allowed up to a maximum of 30 feet so long as public views are not significantly impacted.

  In the Asilomar Dunes Residential Area, development within lots that are visible from Sunset Drive or the recreational trail shall be limited to a maximum of 18 feet in height and shall appear as one story from Sunset Drive or the recreational trail, with development allowed at up to two stories and a maximum of 25 feet in height on all other lots in the area so long as dune visual resources are protected consistent with the LUP.

Land Uses and Designations

- **LUD-1.** Protection of sensitive habitats, natural landforms, scenic resources, and other coastal resources is a priority in all City actions and decisions, and all development standards (including with respect to height, setback, density, lot coverage, etc.) shall be interpreted as maximums (or minimums) that shall be reduced (or increased) so as to protect and enhance such resources to the maximum extent feasible. Development shall only be authorized when the proposed use is allowed per the applicable land use designation, and when it meets all applicable Local Coastal Program policies and standards. A significant portion of the Coastal Zone may be considered Environmentally Sensitive Habitat Area. Please refer to the Land Habitat Sensitivity Map and

policies in §2.4.4, Biological Resources and Environmentally Sensitive Habitat Areas, Land Use Designations.

City of Pacific Grove Forest Hill Specific Plan

The City of Pacific Grove adopted the Forest Hill Specific Plan on November 1998. The Specific Plan established the vision for the Forest Hill area, which generally consists of the commercial area along Forest Avenue in southern Pacific Grove. The Specific Plan established goals for development and physical composition, specifically vehicular and pedestrian circulation; on- and off-street parking; buffers between commercial and residential uses; and the visual importance of the Forest Avenue entrance to the entire community of Pacific Grove. The updated Community Plan's policies and provisions addressed land use, circulation and parking, municipal services, and urban design guidelines. The following goals and policies included in the Specific Plan are applicable to the proposed project:

Resource Protection

- **Policy 2.2.** Preserve buildings and sites of architectural and historic merit.
- **Policy 2.3.** Encourage development to conform to natural contours and to reduce the amount of grading needed.
- **Policy 2.4.** Avoid development that would result in unacceptable fire, flood, slide, or other safety hazards.
- **Policy 2.5.** Avoid development that conflicts with water use policies and viewshed protection. Maximize the amount of permeable ground area.
- **Policy 2.7.** Maintain a harmonious relationship between commercial development and the surrounding natural and constructed residential environment.

Water Service

- **Policy 5.4.** Allow development in the Forest Hill Commercial Area only to the degree that Cal-Am [California American Water Company] is able to supply and distribute water to the area.
- **Policy 5.8.** Condition all development approvals on the completion of water mains and connections, and on the availability of supply.
- **Policy 5.9.** Require that all new development in the Forest Hill commercial area provide adequate sewer service and be connected to the city sewer system.
- **Policy 5.10.** Condition the approval of all new development on the provision, by the applicant, of required sewer improvements.

City of Pacific Grove Zoning Ordinance

Zoning is the instrument that implements the land use designations of the General Plan. In addition to establishing permitted uses, zoning may also establish development standards relating to issues such as intensity, setbacks, height, and parking. Projects submitted to the City for review and approval are generally evaluated for consistency with the zoning classifications.

The City of Pacific Grove Zoning Ordinance is the primary tool used by the City to carry out the goals, objectives, and policies of the Pacific Grove General Plan by classifying and regulating the uses of land and structures within the city, consistent with the General Plan. The City's Zoning Ordinance, contained in Title 23 of the Pacific Grove Municipal Code, describes various types of zoning districts

and land use classifications, land use regulations, development standards, and environmental performance standards. The Zoning Ordinance applies to all land uses and development within the city of Pacific Grove. The purpose of the Zoning Ordinance is to promote and protect the public health, safety, peace, general welfare; growth and redevelopment within the City of Pacific Grove in an orderly manner; and implement the Pacific Grove general plan and LCP.

The project area is divided into zoning districts with allowed uses that are listed in Table 4.10-2.

Table 4.10-2 City of Pacific Grove Zoning Districts in the Project Area

Zoning District	Allowed Uses
C-D	Commercial activities, including retail stores, restaurants, professional offices, and personal service establishments.
C-1	Light commercial uses including retail stores, offices, and personal service establishments.
C-2	Heavier commercial activities, including wholesale businesses, warehouses, and manufacturing uses.
C-FH	Commercial uses supporting visitor accommodations, such as hotels, motels, and related services.
I	Industrial uses, including manufacturing, processing, and storage facilities.
R-1	Single-family residential uses; detached single-family homes and related accessory structures.
R-1-B	Single-family dwellings, accessory buildings and structures, accessory uses normally incidental to single-family residences, and mobile homes.
R-2 and R-2-B-3	Any use permitted in the R-1 district, subject to securing a use permit for any use for which a use permit is required in the R-1 district, duplexes, a dwelling group of two detached single-family homes.
R-3	Single- or two-family dwellings; second units as permitted by Chapter 23.80 of the Pacific Grove Municipal Code; multiple dwellings, apartment houses and dwelling groups, rooming or boarding houses, accessory uses and buildings.
R-3-M	Any use permitted in the R-3 district, subject to obtaining a use permit for any use for which such is required in an R-3 district, motels, hotels, subject to first, adult communities, retirement homes and rest homes.
R-3-PGR	All of the uses permitted and prescribed for the R-3 district, in addition, bed and breakfast inns are permitted.
R-4	Single- or two-family dwellings, second units, multiple dwellings, apartment houses; rooming or boarding houses, dwelling groups; professional uses, community centers, social halls, lodges, clubs and rest homes, bed and breakfast inns, state-licensed residential care facilities for seven or more persons.

Source: City of Pacific Grove 2024

4.10.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The land use and planning analysis describes existing regional and local plans and policies and is intended to fulfill the requirements of *CEQA Guidelines* Section 15125(d). The emphasis of the analysis is on plan inconsistency and potential conflicts between the proposed project and existing applicable land use plans. The proposed project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable plans. A given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation. It follows that it

is nearly, if not impossible, for a project to be in perfect conformity with each and every policy set forth in the applicable plan. Furthermore, any inconsistency would also have to result in a physical change in the environment, not analyzed in the other resource chapters of this DEIR, to result in a significant environmental impact. The analyses below provide a brief overview of the most relevant policies and development standards from the various planning documents. However, the City's consistency conclusions are based upon the planning documents as a whole. In addition, potential impacts are evaluated based potential environmental impacts that could result from inconsistencies.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on land use and planning if it would:

1. Physically divide an established community; and/or
2. 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?

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project physically divide an established community?

Impact LU-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would facilitate the addition of up to 2,335 new dwelling units and up to 292,578 square feet in commercial area in Pacific Grove. As discussed in Chapter 2, *Project Description*, projected growth would occur primarily as either infill redevelopment on underutilized land or on vacant land available for development within the project area. As described in Chapter 2, *Project Description*, 47 sites were identified on vacant and underutilized parcels in other parts of the city, on parcels with residential and commercial zoning. These sites (Sites 42 through 73 and A1 through A15) would accommodate 454 housing units. Twenty-three (23) of these sites (Sites 48, 49, 55, 57 through 64, and 66 through 71) would be upzoned and A10 through A15 would be potentially upzoned to accommodate higher density housing development.

Because development facilitated by the project would be located on existing infill parcels within the city, it would not physically divide established neighborhoods within the City of Pacific Grove. The proposed project identifies housing sites, upzoning areas, and additional parcels within existing established Districts and Neighborhoods in the city, including the Downtown District; Central-Eardley Commercial District; Forest Hill Commercial District; Dennett, Sinex, and Grove Acre Neighborhood; and other areas, as described in Chapter 2*, Project Description*. Identified housing sites, upzoning areas, and additional parcels are connected to the existing circulation network, and would not require the construction of new roadways which could divide established communities.

The project would also revise the Land Use Element of the City General Plan for consistency with the Housing Element Update. The revised Land Use Element would continue to include existing goals and policies, and, if approved, would include the following revised goals and policies that would ensure connectivity between the planned growth areas and established neighborhoods and business districts in Pacific Grove. Proposed revisions are shown with <u>underlined text</u> showing proposed additions and ~~strike-out text~~ showing proposed deletions. The following revisions are

related to community continuity; refer to Appendix B for all proposed revisions to the Land Use Element.

Goal 1. Provide for orderly, well-planned, and balanced development consistent with the historic nature of Pacific Grove, the capacity of the City's infrastructure, and ability to assimilate new growth.

Policy 2. Ensure that new development is well-balanced and compatible with adjacent existing development.

Policy ~~5~~ 4. Encourage consolidation of small lots to create larger, more developable lots. ~~Avoid creating land divisions that result in lots smaller than prevailing lot sizes in the neighborhood, or which are inconsistent with the configuration of surrounding lots.~~

Policy ~~11~~10. Facilitate the development of residential neighborhoods that accommodate a range of housing types at varying densities.

Policy ~~12~~ 11. Support the redevelopment of underutilized lots to encourage development that aligns with the intended land use intensity of the land use designation.

Goal 3. Designate land in commercial and office categories adequate to provide mixed-use development to support a range of goods and services and higher-density residential opportunities to meet the ~~for the~~ needs of Pacific Grove. ~~and its trade area.~~

Policy ~~16~~ 17. Support the integration of residential development in commercial shopping centers.

Goal 6. Encourage compatible mixed-use development allowing the city to achieve long-term housing and economic goals.

Policy ~~24~~ 27. ~~Designate Central-Eardley as a special commercial district recognizing its gateway and transitional functions.~~ Promote and facilitate well-integrated mixed-use development patterns that support a range of commercial uses and allow for a range of compatible housing types within the Central-Eardley District.

The proposed revisions to the City's Land Use Element goals and policies would support an appropriate balance of land uses and further facilitate orderly development in the City. Revisions to policies under Goal 1 would promote well-balanced growth and the consolidation and development of lots, which would promote connectivity. In addition, proposed revisions to policies under Goal 3 and Goal 6 would facilitate well-integrated development patterns to allow for residential and commercial development, and would not result in a physical division of an established community. Therefore, impacts related to physically dividing an established community would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project 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?

Impact LU-2 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD BE CONSISTENT WITH APPLICABLE REGIONAL AND LAND USE PLANS OR REGULATIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Several regionally- and locally-adopted land use plans, policies, and regulations are relevant to development under the proposed project. These include AMBAG's 2045 MTP/SCS, and the City General Plan, LCP, and Forest Hill Specific Plan. The project's consistency with each is discussed below.

Association of Monterey Bay Area Governments 2045 MTP/SCS

AMBAG's 2045 MTP/SCS is a long-range land use and transportation plan for the Monterey Bay region. The 2045 MTP/SCS identifies Placetypes (land uses) for a 2045 buildout scenario of Pacific Grove. AMBAG's buildout scenario is generally consistent with buildout that would be facilitated by the project, as the project prioritizes housing development but would also facilitate mixed-use and commercial development.

The 2045 MTP/SCS contains six goals intended to benefit the region (AMBAG 2022, 29). The three goals in the 2045 MTP/SCS that are relevant to the environmental analysis are:

- Healthy Communities – Protect the health of our residents; foster efficient development patterns that optimize travel, housing, and employment choices and encourage active transportation.
- Environment – Promote environmental sustainability and protect the natural environment.
- System Preservation and Safety – Preserve and ensure a sustainable and safe regional transportation system.

The project involves updating the City's Housing Element to be consistent with state housing requirements and facilitate the development of a range of housing types in Pacific Grove. Residential development facilitated by the project would be higher density, and would be located on previously developed or infill sites within the city, which are served by existing transit and infrastructure. Accordingly, the project would facilitate housing in a developed area with existing transit and active transportation options and, as a result, would not conflict with the Healthy Communities goal.

The project also involves revisions to the General Plan Land Use and Health and Safety Elements and zoning and subdivision ordinance amendments determined necessary as a result of the Housing Element Update. These revisions are intended to ensure consistency between the Housing Element Update and the Land Use Element, Health and Safety Element, and zoning and subdivision ordinances, and to comply with recent state law. Proposed revisions include changes to goals and policies related to the size, type, and density of land use development, and new goals and policies related to emergency access and safety. These amendments, and the project as a whole, would not facilitate specific development; rather, the amendments would enable implementation of and ensure consistency with the Housing Element Update. Accordingly, the proposed amendments would not allow specific development that could result in environmental impacts. In addition the proposed amendments would not involve revisions to goals and policies of the City's General Plan Natural Resources Element, Historic and Archaeological Resources Element, other General Plan

elements, or the City's municipal code that intend to protect natural resources and the environment. Therefore, the project would not conflict with AMBAG's Environment and System Preservation and Safety goals.

Overall, the project would not conflict with AMBAG goals adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant.

City of Pacific Grove General Plan

The project involves updating the City's Housing Element to be consistent with state housing requirements and facilitate the development of a range of housing types in Pacific Grove. To ensure consistency between the Housing Element and other elements of the Pacific Grove General Plan, and to comply with recent state laws, the project also involves revisions to the Land use and Health and Safety Elements of the City's General Plan. Proposed revisions to the Land Use Element would include revised densities to several land use designations to be consistent with zoning amendments and the Housing Element Update, and revisions to the land use map to reflect housing sites with increased densities. Proposed revisions to the Health and Safety Element would include updated background information and maps to reflect existing conditions, identification of evacuation routes and capacity, and revised policies related to climate change, fire hazards, flooding, and emergency response. These revisions would ensure that land use designations, allowable land uses, and densities in the Land Use Element are consistent with housing development envisioned in the Housing Element Update, and that the Health and Safety Element complies with recent state law. These amendments, and the project as a whole, would not facilitate specific development; rather, the amendments would enable implementation of and ensure consistency with and implementation of the Housing Element Update. Accordingly, the proposed amendments would not allow specific development that could result in environmental impacts. The project would not involve other changes to other elements of the City's General Plan, and development facilitated by the project would continue to be subject to existing General Plan goals and policies that have the purpose of avoiding or mitigating an environmental effect. Accordingly, the project would not conflict with General Plan goals and policies adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

City of Pacific Grove Local Coastal Program

In the northeast portion of the city, the Coastal Zone boundary generally follows Central Avenue, with areas north of Central Avenue located in the Coastal Zone. As shown in Figures 2-6 and 2-7 in Chapter 2, *Project Description,* there are five housing sites located within the Coastal Zone (Sites 10, 11, 12, 19, and 56). The project would not involve upzoning or rezoning these housing sites, as discussed in Section 2.6.3 of the *Project Description*; rather, development facilitated by the project on these sites would not be greater in size or density than development that is currently allowed. Accordingly, development facilitated by the project within sites located in the Coastal Zone would be consistent with land uses and buildout potential identified in the LCP. Further, development in the Coastal Zone would continue to be required to comply with LCP goals and policies, including those adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, the project would not conflict with LCP goals and policies adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

City of Pacific Grove Forest Hill Specific Plan

The Forest Hill Specific Plan area encompasses the commercial area along Forest Avenue, and includes the housing sites located in the Forest Hill Commercial District (Sites 20 through 37). The project would not involve upzoning or rezoning these housing sites, as discussed in Section 2.6.3 of the *Project Description;* rather, development facilitated by the project on these sites would not be greater in size or density than development that is currently allowed. Therefore, development facilitated by the project in the Forest Hill Commercial District would be consistent with the land uses and buildout potential identified in the Forest Hill Specific Plan. Further, development within the Forest Hill Specific Plan area would continue to be subject to Specific Plan goals and policies. Accordingly, the project would not conflict with Forest Hill Specific Plan goals and policies adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

Conclusion

As described above, the proposed project is consistent with land use plans, policies, and regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect, including AMBAG's 2045 MTP/SCS, City General Plan, LCP, and Forest Hill Specific Plan. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.10.4 Cumulative Impacts

The geographic scope for cumulative land use and planning impacts is the City of Pacific Grove and the AMBAG area. This geographic scope is appropriate because buildout facilitated by the project would affect overall buildout in the AMBAG area, and the AMBAG 2045 MTP/SCS is an applicable regional plan that includes Pacific Grove. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to adversely impact land use and planning.

None of the identified projects in Table 3-1 would result in the physical division of an established community, as they would involve development within established parcels and would not involve construction of a roadway or other linear feature that would divide an established community. Therefore, cumulative impacts related to dividing an established community (Threshold 1) would be less than significant.

Cumulative projects would be required to adhere to applicable zoning and development regulations, and General Plan policies that are intended to mitigate environmental impacts where feasible. Cumulative projects would also be reviewed for consistency with applicable land use plans by the approving jurisdiction prior to approval. Because it is unlikely that jurisdictions would approve a project that is substantially inconsistent with applicable land use plans and policies, it is not anticipated that cumulative development would be in substantial conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect . In addition, as discussed under "Methodology" above, cumulative projects would not be expected to be in perfect conformity with each and every policy, nor does state law require precise conformity of a proposed project with every policy or land use designation. Therefore, it is anticipated that cumulative projects would not substantially conflict with applicable plans and policies prior to

approval, such that cumulative projects would not result in a significant cumulative environmental impact related to land use plan consistency (Threshold 2).

4.11 Noise

This section analyzes noise-related impacts associated with development facilitated by the project, including temporary or permanent increases in ambient noise levels, the generation of groundborne vibration or noise, or the exposure of workers or residents to excessive airport noise. Transportation data used in this section for both existing conditions and buildout of the proposed project were provided by the *Transportation Studies to Support CEQA Analysis Memorandum* (Transportation Memorandum) prepared for the proposed project in March 2025 (Kimley Horn 2025; Appendix E).

4.11.1 Setting

a. Overview of Noise and Vibration Measurement

Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Human Perception of Sound

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease (Caltrans 2013).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible; and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (Caltrans 2013).

Sound Propagation and Shielding

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in the noise level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions.

Sound levels are described as either a "sound power level" or a "sound pressure level," which are two distinct characteristics of sound. Both share the same unit of measurement, the dB. However, sound power (expressed as L_{pw}) is the energy converted into sound by the source. As sound energy travels through the air, it creates a sound wave that exerts pressure on receivers, such as an

eardrum or microphone, which is the sound pressure level. Sound measurement instruments only measure sound pressure, and noise level limits are typically expressed as sound pressure levels.

Noise levels from a point source (e.g., construction, industrial machinery, air conditioning units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to noise as well. The FHWA's guidance indicates that modern building construction generally provides an exterior-to-interior noise level reduction of 10 dBA with open windows and an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011).

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. The noise descriptors used for this study are the equivalent noise level (L_{eq}), Day-Night Average Level (DNL; may also be symbolized as L_{dn}), and the community noise equivalent level (CNEL; may also be symbolized as L_{den}).

L_{eq} is one of the most frequently used noise metrics; it considers both duration and sound power level. The L_{eq} is defined as the single steady-state A-weighted sound level equal to the average sound energy over a time period. When no time period is specified, a 1-hour period is assumed. The L_{max} is the highest noise level within the sampling period, and the L_{min} is the lowest noise level within the measuring period. Normal conversational levels are in the 60 to 65dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.). Community noise can also be measured using Community Noise Equivalent Level (CNEL or L_{DEN}), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013).[1] The relationship between the peak-hour L_{eq} value and the L_{dn}/CNEL depends on the distribution of noise during the day, evening, and night; however noise levels described by L_{dn} and CNEL usually differ by 1 dBA or less. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 CNEL, while areas near arterial streets are in the 50 to 60+ CNEL range (FTA 2018). Table 4.11-1 briefly defines measurement descriptors and other sound terminology used in this section.

[1] Because DNL and CNEL are typically used to assess human exposure to noise, the use of A-weighted sound pressure level (dBA) is implicit. Therefore, when expressing noise levels in terms of DNL or CNEL, the dBA unit is not included.

Table 4.11-1 Sound Terminology

Term	Definition
Sound	A vibratory disturbance created by a vibrating object which, when transmitted by pressure waves through a medium such as air, can be detected by a receiving mechanism such as the human ear or a microphone.
Noise	Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
Ambient Noise	The composite of noise from all sources near and far in a given environment.
Decibel (dB)	A unitless measure of sound on a logarithmic scale, which represents the squared ratio of sound-pressure amplitude to a reference sound pressure. The reference pressure is 20 micropascals, representing the threshold of human hearing (0 dB).
A-Weighted Decibel (dBA)	An overall frequency-weighted sound level that approximates the frequency response of the human ear.
Equivalent Noise Level (L_{eq})	The average sound energy occurring over a specified time period. In effect, L_{eq} is the steady-state sound level that in a stated period would contain the same acoustical energy as the time-varying sound that actually occurs during the same period.
Ambient Noise	The composite of noise from all sources near and far in a given environment.
Maximum and Minimum Noise Levels (L_{max} and L_{min})	The maximum or minimum instantaneous sound level measured during a measurement period.
Day-Night Level (DNL or L_{dn})	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m. (nighttime).
Community Noise Equivalent Level (CNEL)	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the A-weighted sound levels occurring between 7:00 p.m. and 10:00 p.m. and 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m.

Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent buildings or structures and vibration energy may propagate through the buildings or structures. Vibration may be felt, may manifest as an audible low-frequency rumbling noise (referred to as groundborne noise), and may cause windows, items on shelves, and pictures on walls to rattle. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants at vibration-sensitive land uses and may cause structural damage.

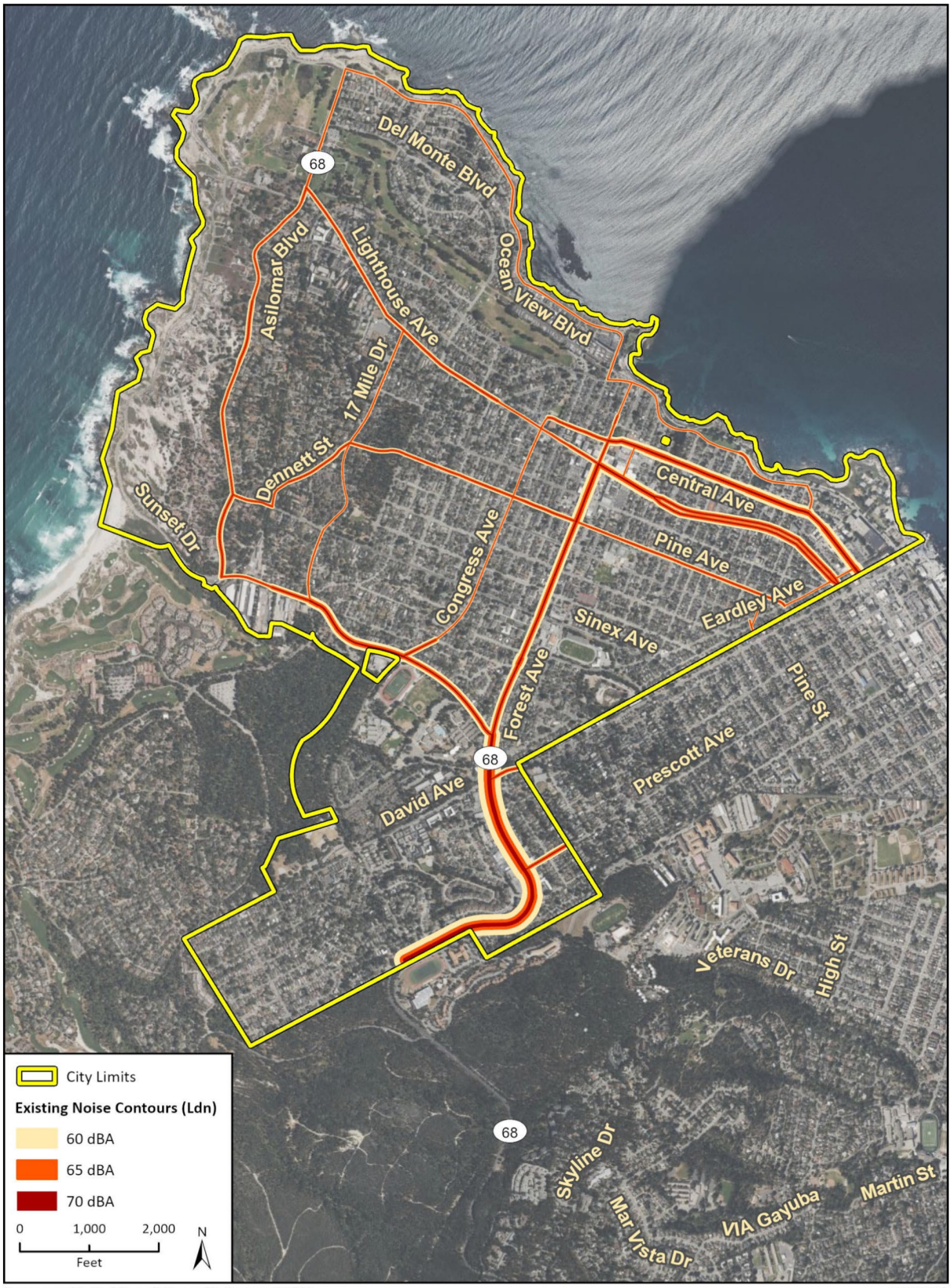
Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Vibration amplitudes are usually expressed in peak particle velocity (PPV). The PPV velocity is normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used as it corresponds to the stresses that are experienced by buildings (Caltrans 2020).

High levels of groundborne vibration may cause damage to nearby building or structures; at lower levels, groundborne vibration may cause minor cosmetic (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation.

b. Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise-sensitive land uses typically include residences, schools, hospitals and long-term care medical facilities (such as hospitals and nursing homes). The community noise survey results in Section 10.14.4 of the current Pacific Grove General Plan (Pacific Grove 1994) indicate that noise levels within the City of Pacific Grove are generally typical of a quiet suburban community with estimated L_{dn} values ranging from 39-61 dBA. Maximum noise levels are generally caused by local traffic or intermittent aircraft overflights. Roadways with the highest roadway vehicle volumes and speeds produce the highest noise levels. The roadways in Pacific Grove with the highest roadway vehicle volumes and, thus, the highest noise levels are Lighthouse Avenue, Forest Avenue (SR-68), Central Avenue, Ocean View Boulevard, Pine Avenue and others. Figure 4.11-1 shows the existing 60, 65, and 70 dBA CNEL noise contours on "major" roadways, which consist of multiple-lane roadways or roadways that provide the primary route through or across the city. Major roadways include Forest Avenue, Lighthouse Avenue, Pine Avenue, Central Avenue, Congress Avenue, Ocean View Boulevard, Asilomar Avenue, Dennett Street, and portions of 17 Mile Drive, David Avenue, and Eardley Avenue.

Figure 4.11-1 Existing Roadway Vehicle Noise Contours



Imagery provided by Microsoft Bing and its licensors © 2025.

23-14477 EPS
Fig X Existing Noise Contours

4.11.2 Regulatory Setting

a. Federal Regulations

Federal noise standards established by the U.S. Department of Housing and Urban Development (HUD) are applicable to residential projects that receive HUD assistance. These standards are presented in 24 Code of Federal Regulations (CFR) Part 51. New construction proposed in high noise areas (exceeding 65 dBA L_{dn}) must incorporate noise attenuation features to maintain acceptable interior noise levels. A goal of 45 dBA L_{dn} is set forth for interior noise levels and attenuation requirements are geared toward achieving that goal. It is assumed that with standard construction, any building will provide sufficient attenuation to achieve an interior level of 45 dBA L_{dn} or less if the exterior level is 65 dBA L_{dn} or less. Approvals in a "normally unacceptable noise zone" (exceeding 65 dBA, but not exceeding 75 dBA) require a minimum of 5 dBA of additional noise attenuation for buildings having noise sensitive uses (e.g., residences) if the day-night average is greater than 65 dBA, but does not exceed 70 dBA, or a minimum of 10 dBA of additional noise attenuation if the day-night average is greater than 70 dBA, but does not exceed 75 dBA.

There are additional federal regulations that influence the audible landscape, especially for projects where federal funding is involved. For example, the Federal Highway Administration (FHWA) requires abatement of highway traffic noise for highway projects through rules in the Code of Federal Regulations (23 CFR Part 772), the FTA, and Federal Railroad Administration (FRA). Each agency recommends thorough noise and vibration assessments through comprehensive guidelines for any highway, mass transit, or high-speed railroad projects that would pass by residential areas.

b. State Regulations

California Building Code

California Code of Regulations Title 24, Building Standards Administrative Code, Part 2, Chapter 12, and the California Building Code codify the state noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by exterior noise sources and interior noise sources from separate areas. The regulations specify that interior noise levels shall not exceed 45 dBA CNEL/L_{dn} in any habitable room, as well as specifying sound transmission class requirements for walls, floors, and ceilings around sleeping units.

California Green Building Code

California Green Building Standards Code 2019 (CALGreen) Section 5.507.4, Acoustical Control, regulates construction of non-residential uses within the 65 dBA CNEL/L_{dn} contour of an airport, freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1-2 “buildings exposed to a noise level of 65 dBA L_{eq}(1-hr) during any hour of operation shall employ sound-resistant assemblies as determined by a prescriptive method or performance method”.

Projects may demonstrate compliance through the prescriptive method if wall and roof-ceiling assemblies exposed to the noise source meet a composite sound transmission class rating of at least 50 or a composite outdoor/indoor transmission class rating of no less than 40, with exterior windows of a minimum sound transmission class of 40 or outdoor/indoor transmission class of 30. Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source are constructed to provide an interior noise environment that does not exceed 50 dBA L_{eq}(1-hr) in occupied areas during hours of operations.

c. Local Regulations

City of Pacific Grove General Plan

The current City of Pacific Grove General Plan was adopted in 1994. The General Plan's Noise Chapter 10.14 in the Health and Safety Element establishes policies to protect noise-sensitive land uses from exposure to excessive ambient noise. This chapter recommends allowable noise exposures for noise sensitive land uses which are shown in Table 4.11-2. The Health and Safety Element identifies all residential uses, schools, and long-term care medical facilities as noise-sensitive land uses.

Goal 7. Protect Pacific Grove residents from the harmful effects of excessive noise.

- **Policy 28.** Review possible noise-producing uses and mitigate as necessary.
- **Policy 30.** Prevent the expansion or intensification of existing noise-producing commercial/utility uses on adjacent residential properties.
  - **Program II**. Require that new noise-sensitive uses in proximity to existing noise sources include receiver-based mitigation measures.
  - **Program JJ.** Prevent new noise-sensitive land uses from locating in areas exposed to existing or projected future levels of noise from transportation noise sources that exceed 60 dB L_{dn}/CNEL (70 dB L_{dn}/CNEL in playgrounds and parks) unless the project design includes effective mitigation measures to reduce noise in outdoor activity areas and interior spaces to the levels specified in Figure 10-6 [reproduced as Table 4.11-2].
  - **Program LL.** Mitigate any noise created by new proposed stationary noise sources so that they will not exceed the noise level standards of Figure 10-7 [reproduced as Table 4.11-3] on lands designated for noise-sensitive uses.
  - **Program OO.** Purchase only equipment and vehicles that comply with noise level standards consistent with the best available noise control technology.
  - **Program PP.** Review and modify as necessary the City's noise ordinance. The ordinance should (1) employ guidelines of the California Office of Noise Control; (2) be designed to protect persons from excessive levels of noise that interfere with sleep, communication, relaxation, health, or legally permitted use of property, whether such noise is from existing or future sources; (3) make it unlawful to create noise that exceeds the standards of Figure 10-8, as measured at the exterior of noise-sensitive land uses; (4) contain maximum allowable levels of interior noise created by exterior sources; (5) provide for exemptions or modifications to noise requirements for construction activities, school functions, property maintenance, heating and cooling equipment, utility facilities, waste collection, and other sources; and (6) establish responsibilities and procedures for noise measurements, enforcement, abatement, and variances.
  - **Program QQ.** Continue to enforce existing ordinances relating to inappropriate and unnecessary noise.

Table 4.11-2 City of Pacific Grove Noise/Land Use Compatibility Matrix

Transportation Noise Sources	Outdoor Activity[1] Areas	Interior Spaces	Interior Spaces
Land Use	**L_{dn}/CNEL, dB**	**L_{dn}/CNEL, dB**	**L_{eq}, dB[2]**
Residential	60[3]	45	–
Transient Lodging	60[3]	45	–
Hospitals, Nursing Homes	60[3]	45	–
Theaters, Auditoriums, Music Halls	–	–	35
Churches, Meeting Halls	60[3]	–	40
Office Buildings	60[3]	–	45
Schools, Libraries, Museums	–	–	45
Playgrounds, Neighborhood Parks	70	–	–

Notes:

[1] Where the location of outdoor activity areas is unknown, the exterior noise level standard is applied to the property line of the receiving land use.

[2] As determined for a typical worst-case hour during periods of use.

[3] Where it is not possible to reduce noise in outdoor activity areas to 60 dB Ldn/CNEL or less using a practical application of the best available noise reduction measures, an exterior noise level of up to 65 dB Ldn/CNEL may be allowed, provided that available exterior noise level reduction measures have been implemented and interior noise levels comply with this table.

Source: City of Pacific Grove 1994

Table 4.11-3 Maximum Allowable Noise Exposure – Stationary Noise Sources

	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
Hourly Leq, dB	50	45
Maximum Level, dB	70	65

Source: City of Pacific Grove 1994

Notes: As determined at the property line of the receiving land use. When determining the effectiveness of noise mitigation measures, the standards may be applied on the receptor side of noise barriers or other property line noise mitigation measures.

City of Pacific Grove Municipal Code

Chapter 11.96 of the Pacific Grove Municipal Code outlines unlawful noises. The purpose of Section 11.96.040 is to protect neighbors and the community from excessive noise caused by construction activities while not unduly restricting lawful construction, by establishing specific hours when construction noise is not allowed. All noise-generating construction activities, as well as delivery and removal of materials and equipment associated with those construction activities, are limited to the hours of 8:00 a.m. to 6:00 p.m., Monday through Saturday, and 10:00 a.m. to 5:00 p.m. on Sunday.

A permit to allow an exception to these time limitations may be issued by the zoning administrator or designee if it is found that the exception is warranted by unique and overriding circumstances, is in furtherance of the purpose of this section, and is of short duration. Each permit shall be for a limited term, and shall be conditioned to require renewal after that term. Before issuing a permit under this section the city shall post and mail notice of the proposed permit to neighbors within 300 feet of the construction site. Notice shall include a statement of the proposed construction time limits, duration of the exception and the process by which the permit may be appealed. The city manager or designee shall have the discretion to waive the notice requirement in the event he or she determines there is an imminent danger to health, safety or property.

4.11.3 Impact Analysis

a. Methodology

Construction Noise

Construction noise levels that could occur with implementation of the project are based on reference noise levels published by the FTA, which are shown in Table 4.11-5.

Stationary On-Site Operational Noise

Stationary and other sources of noise in Pacific Grove include those associated with the standard operation of land uses. The project would facilitate the development of commercial and residential land uses. Sources of noise from commercial uses could include but are not limited to operation of equipment or vehicles, landscaping and building maintenance activities, amplified music, or people's voices. Sources of noise from residential uses could include but are not limited to landscape and building maintenance activities, stationary mechanical equipment (e.g., pumps, HVAC units), garbage collection activities, and other stationary and area sources such as people's voices and amplified music.

Mobile Off-Site Operational (Traffic) Noise

Roadway vehicle noise levels for the proposed project were estimated using the FHWA roadway vehicle noise prediction model RD77-108 (FHWA model). Roadway vehicle noise impacts are analyzed based on average daily trip (ADT) roadway volume for existing conditions and the amount of growth expected under the proposed project, as well as data regarding speeds and number of lanes. The FHWA model predicts noise levels through a series of adjustments to a reference sound level. These adjustments account for distances from the roadway, roadway vehicle volumes, vehicle speeds, car/truck mix, number of lanes, and road width.

Pursuant to *CEQA Guidelines* Section 15125, an EIR must include a description of the physical environmental conditions in the vicinity of a project. These conditions normally constitute the baseline physical conditions by which a lead agency determines whether an environmental impact is significant. Generally, baseline physical conditions are those that exist at the time the notice of preparation is published, which for this DEIR would be January 2024. However, the lead agency may also use baselines consisting of both existing conditions and projected future conditions to provide an accurate picture of the project's impacts. For the purpose of the traffic noise analysis, traffic noise generated by development facilitated by the project is compared to future traffic noise levels that are projected to occur without implementation of the project. Comparing projected traffic noise increases to existing traffic noise would be misleading and inaccurate, as whether or not the project is implemented, traffic noise will increase in Pacific Grove as population growth and development occur. In other words, the baseline traffic noise level will increase in the future with or without the project, and it would be misleading to compare future traffic noise to a past baseline level of traffic noise as this would inaccurately attribute all traffic noise increases to the proposed project. Therefore, to accurately evaluate the project's impacts, this analysis compares project traffic noise (2031 with project) conditions to projected future baseline (2031 no project) conditions.

Noise affecting the city is primarily from traffic on highways and "major" roadways, which consist of multiple-lane roadways or roadways that provide the primary route through or across the city.

Project traffic noise increases were estimated using the ADT data provided by Kimley Horn for the project (Kimley Horn 2025). Existing, future (2031), and future (2031) with project traffic volume estimates along the roadway study segments are shown in Appendix K.

Groundborne Vibration

The project would not include substantial vibration sources associated with operation. Construction activities have the greatest potential to generate groundborne vibration affecting nearby noise-sensitive receivers. Construction vibration levels that could occur due to buildout of the project are based on reference vibration levels published by the FTA, which are shown in Table 4.11-7.

Airport Noise

The airport noise contours for Monterey Airport and Marina Municipal Airport with respect to the location of housing opportunity sites were utilized to determine potential impacts from exposure to airport-related noise.

General Plan Land Use Compatibility

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 (No. S 213478), issued December 17, 2015), it is generally no longer the purview of the CEQA process to evaluate the impact of existing environmental conditions on a proposed project. However, this environmental analysis considers the potential impacts of the environment on the project for informational purposes.

Project implementation would have the potential to change the amount of residential land uses within the City by facilitating more residential growth than was previously planned for in the Pacific Grove General Plan. These residential noise-sensitive receivers would be exposed to transportation noise from roadways and aircraft, and may be exposed to noise levels that exceed the City's land use compatibility guidelines for noise. These standards are shown in Table 4.11-2 above.

As part of this analysis, future (2031) noise contours from roadway noise sources were modeled and presented in Figure 4.11-2 below in Section 4.11.4, *Impact Analysis*, and included in Appendix K of this document. As shown in the figure, many of the housing sites located near major roadways would be within at least the 70 dBA DNL noise contours. The noise is dominated by traffic on major roadways such as Lighthouse Avenue, Forest Avenue (SR-68), Central Avenue, Ocean View Boulevard, Pine Avenue and other streets. It should be noted that these calculations do not account for topography or shielding from existing buildings, which would result in lower noise levels as the noise travels farther from the roadways. Existing traffic noise contours in the proposed project generally align with the contour predictions, with noise dominated by major roadways and arterials.

b. Significance Thresholds

Based on Appendix G of the *CEQA Guidelines,* a significant noise impact would occur if new development facilitated by the proposed project would:

1. Generate substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies;
2. Generate excessive groundborne vibration or groundborne noise levels; or

3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

Construction Noise

Development carried out under the proposed project could have a significant impact if temporary construction noise during permitted daytime hours exposed noise-sensitive receivers to significantly adverse noise levels, or if construction noise occurred outside the hours detailed in Pacific Grove Municipal Code Section 11.96.040. As the City does not define a quantitative construction noise threshold, for purposes of analyzing impacts from construction projects carried out under the proposed project, the City has determined that the FTA construction criteria are applicable to the proposed project. FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). For residential uses, the daytime noise threshold is 80 dBA $L_{eq(8hr)}$ for an 8-hour period. Construction noise would be significant if it exceeds this threshold.

Groundborne Vibration

This analysis applies the following vibration thresholds established by FTA for potential structural damage to buildings. The FTA thresholds in Table 4.11-4 are used to assess the potential structural damage to buildings from construction vibration. A significant impact would be identified if construction facilitated by the project would generate excessive vibration levels at surrounding receivers. Groundborne vibration levels exceeding 0.12 in/sec PPV would have the potential to result in cosmetic damage to buildings extremely susceptible to vibration damage (i.e., historic buildings), and groundborne vibration levels exceeding 0.2 in/sec PPV would have the potential to result in cosmetic damage to non-engineered timber and masonry buildings (i.e., residential buildings).

Table 4.11-4 Vibration-Related Building Damage Thresholds

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity
in/sec = inches per second
L_v = root mean square velocity in decibels (VdB) re 1 micro-inch/second
Source: FTA 2018

On-site Operational Noise

On-site activities at new development facilitated by the proposed project would have a significant impact if it would expose neighboring noise-sensitive land uses to noise levels exceeding the City's existing standards shown in Table 4.11-2.

Increase in Traffic Noise

Although the City of Pacific Grove does not have specific noise level criteria for assessing traffic noise impacts, a project is typically assumed to have a significant impact on the environment related to traffic noise if it would substantially increase the ambient noise levels for adjoining areas. The following thresholds of significance are similar to those recommended by the Federal Aviation Administration (Federal Interagency Committee on Noise 2020), which use criteria based on transportation noise increases and are commonly applied to roadway traffic noise analyses under CEQA. A significant impact would occur if traffic noise increases the existing noise environment by the following:

- For ambient noise environments of 65 dBA L_{dn} and higher, an increase of 1.5 dBA L_{dn} or greater
- For ambient noise environments of 60 to 64 L_{dn}, an increase of than 3 dBA L_{dn} or greater
- For ambient noise environments of less than 60 dBA L_{dn}, an increase of 5 dBA L_{dn} or greater

Existing and cumulative future noise levels are compared to assess the increase in noise-sensitive receptors' exposure to traffic noise during buildout of the proposed project.

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact NOI-1 CONSTRUCTION OF INDIVIDUAL DEVELOPMENT FACILITATED BY THE PROJECT WOULD TEMPORARILY PRODUCE HIGH NOISE LEVELS, POTENTIALLY AFFECTING NEARBY NOISE-SENSITIVE LAND USES. OPERATION OF DEVELOPMENT FACILITATED BY THE PROJECT WOULD ALSO INCREASE TRANSPORTATION NOISE. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Construction

Construction noise from individual development facilitated by the proposed project would temporarily increase ambient noise levels on and adjacent to individual construction sites, including noise from construction traffic. Since the project does not propose any specific development projects, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects. However, areas of Pacific Grove adjacent to the proposed housing sites, upzoning areas, and additional parcels would be exposed to the highest levels of construction noise for the longest duration, especially in areas where housing sites, upzoning areas, and additional parcels are more concentrated. Construction noise associated with buildout facilitated by the proposed project would occur over the project's planning period (2031).

Construction activities that would generate noise include but are not limited to construction traffic and hauling, demolition, and construction. Table 4.11-5 illustrates typical noise levels associated with various common types of construction equipment at a distance of 50 feet, which is representative of the exposure of adjacent noise-sensitive receptors to construction noise. Noise from stationary sources of equipment typically drops off at a rate of about 6 dBA per doubling of distance; therefore, noise levels would be about 6 dBA lower than shown in the table at 100 feet from source construction site and 12 dBA lower at a distance of 200 feet from source construction site.

Table 4.11-5 Typical Noise Levels for Construction Equipment

Equipment	Estimated Noise Levels at Nearest Sensitive Receptors (dBA Leq)		
	50 feet	100 feet	200 feet
Air Compressor	81	75	69
Backhoe	80	74	68
Concrete Mixer	85	79	73
Dozer	85	79	73
Grader	85	79	73
Jackhammer	88	82	76
Paver	89	83	77
Pile-drive (Impact)	101	95	89
Pile-driver (Sonic)	95	89	83
Saw	76	70	64
Scraper	89	83	77
Truck	88	82	76

Source: FTA 2006

As shown in Table 4.11-5, the loudest piece of construction equipment is a pile-driver, which could cause noise levels to approach 101 dBA L_{eq} at a distance of 50 feet. Pile-drivers are used to install deep foundation piers and are not typically used for construction of residential or commercial development. However, project-level details are not currently available for future projects that would be facilitated by the proposed project, and it cannot be guaranteed that future construction would not involve use of a pile-driver. Therefore, this sound level is considered to provide a conservative analysis. Accordingly, construction noise associated with buildout facilitated by the project would likely exceed ambient noise levels and may temporarily disturb people at neighboring properties.

Compliance with Section 11.96.040 of Pacific Grove Municipal Code would restrict the timing of construction activities authorized by a City permit to the hours of 8 a.m. to 6 p.m. Monday through Saturday and 10 a.m. to 5 p.m. on Sundays. In addition, implementation of and adherence to the following existing policies in the Health and Safety Element of the General Plan would ensure continued application of the City's existing timing restrictions on construction activity, or modification of those standard restrictions as necessary to protect noise-sensitive receptors. While the project would involve revisions to the Health and Safety Element, these existing policies would remain in effect:

Goal 7. Protect Pacific Grove residents from the harmful effects of excessive noise.

- **Policy 28.** Review possible noise-producing uses and mitigation, as necessary.
  - **Program OO.** Purchase only equipment and vehicles that comply with noise level standards consistent with the best available noise control technology.
  - **Program PP.** Review and modify as necessary the City's noise ordinance. The ordinance should (1) employ guidelines of the California Office of Noise Control; (2) be designed to protect persons from excessive levels of noise that interfere with sleep, communication, relaxation, health, or legally permitted use of property, whether such noise is from existing or future sources; (3) make it unlawful to create noise that exceeds the standards of Figure 10-8, as measured at the exterior of noise-sensitive land uses; (4) contain maximum

allowable levels of interior noise created by exterior sources; (5) provide for exemptions or modifications to noise requirements for construction activities, school functions, property maintenance, heating and cooling equipment, utility facilities, waste collection, and other sources; and (6) establish responsibilities and procedures for noise measurements, enforcement, abatement, and variances.

Implementation of Goal 7, Policy 28, Program OO and Program PP would reduce construction noise impacts associated with future discretionary projects carried out under the proposed project. However, project-level details are not currently available for future projects that would be facilitated by the proposed project. Therefore, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects, or construction noise at adjacent properties. Therefore, construction noise levels associated with future projects may exceed the FTA's daytime construction noise limits, and impacts would be potentially significant and mitigation is required.

Operation

Stationary Noise

Stationary and other sources of noise in Pacific Grove include those associated with the standard operation of land uses. These sources could include, but are not limited to, landscape and building maintenance activities, stationary mechanical equipment (e.g., pumps, HVAC units), garbage collection activities, and other stationary and area sources such as people's voices and amplified music. Noise generated by residential uses are generally short-term and intermittent in nature. The project would provide for an increase in residential development throughout the city. Residential development tends to have lower noise levels associated than other uses, such as industrial or commercial uses.

The Health and Safety Element includes the following goals, policies and programs that pertain to operational stationary noise. While the project would involve revisions to the Health and Safety Element, these existing policies would remain in effect:

Goal 7. Protect Pacific Grove residents from the harmful effects of excessive noise.

- **Policy 28.** Review possible noise-producing uses and mitigation, as necessary.
  - **Program II.** Require that new noise-sensitive uses in proximity to existing noise sources include receiver-based mitigation measures.
  - **Program LL.** Mitigate any noise created by new proposed stationary noise sources so that they will not exceed the noise level standards of Figure 10-7 [reproduced as Table 4.11-3] on lands designated for noise-sensitive uses.
  - **Program OO.** Purchase only equipment and vehicles that comply with noise level standards consistent with the best available noise control technology.
  - **Program PP.** Review and modify as necessary the City's noise ordinance. The ordinance should (1) employ guidelines of the California Office of Noise Control; (2) be designed to protect persons from excessive levels of noise that interfere with sleep, communication, relaxation, health, or legally permitted use of property, whether such noise is from existing or future sources; (3) make it unlawful to create noise that exceeds the standards of Figure 10-8, as measured at the exterior of noise- sensitive land uses; (4) contain maximum allowable levels of interior noise created by exterior sources; (5) provide for exemptions or

modifications to noise requirements for construction activities, school functions, property maintenance, heating and cooling equipment, utility facilities, waste collection, and other sources; and (6) establish responsibilities and procedures for noise measurements, enforcement, abatement, and variances.

- **Program QQ.** Continue to enforce existing ordinances relating to inappropriate and unnecessary noise.

Implementation of Policy 28, Program II, and Program LL would reduce potential impacts associated with new noise-producing land uses by identifying mitigation that would reduce noise associated with new stationary noise sources below acceptable noise standards. However, because project-level details are not currently available for future projects that would be facilitated by the proposed project, it is not possible to determine exact stationary noise levels or the locations of on-site operational noise generating sources. Stationary operational noise could exceed the City's most stringent standard for allowable noise exposure of 45 L_{eq}, dB. Therefore, on-site operational impacts from the project would be potentially significant, and mitigation would be required.

Traffic Noise

Implementation of the project would facilitate development in Pacific Grove, which would generate new vehicle trips that could incrementally increase the exposure of land uses along roadways to operational traffic noise. However, growth would occur in Pacific Grove whether or not the proposed project is implemented; therefore, this analysis considers the project's contribution to noise levels that are projected to occur without implementation of the project. Figure 4.11-2 shows the 60, 65, and 70 dBA L_{dn} noise contours from roadways and highways for year 2031 roadway vehicle scenarios.

Most roadway segments in Pacific Grove would experience a traffic noise increase of less than 1 dBA in the future with implementation of the project. Table 4.11-6 summarizes the project and cumulative increase in traffic noise for street segments where the cumulative traffic noise volume increases by 1 dBA or more, based on ADT traffic volume data provided by Kimley Horn (Kimley Horn 2025). All roadway segment traffic noise data is shown in Appendix K.

As shown in Table 4.11-6, the maximum increase in traffic noise associated with cumulative conditions (2031 plus project) would be 3.8 dBA along Eardley Avenue from Lighthouse Avenue to Evans Avenue. The project's contribution to the cumulative increase from traffic noise would be as high as 4.3 dBA along multiple roadway segments on Congress Avenue, which is below the applicable threshold of 5 dBA. As shown in Table 4.11-6, there are no significant roadway vehicle noise increases estimated along any roadways in the proposed project area. Therefore, roadway vehicle noise increases would be less than significant. All roadway segment traffic noise data is shown in Appendix K.

Table 4.11-6 Summary of Project and Cumulative Traffic Noise Increases

Roadway	Segment	Existing ADT	2031 No Project ADT	2031 Plus Project ADT	Cumulative Increase (2031 Plus Project – Existing) dBA (Ldn)	Project Cumulative Contribution (2031 Plus Project – 2031 No Project) dBA (Ldn)	Significance Threshold dBA	Significant? Y/N
2Nd St	Alley to Pine Ave	49	64	64	1.3	0.0	5.0	N
	Eardley Ave/Spruce Ave to Alley	49	64	64	1.2	0.0	5.0	N
David Ave	Devisadero St to Devisadero St	4,320	5,873	6,508	1.8	0.4	5.0	N
	Forest Ave to Devisadero St	4,812	6,357	7,186	1.7	0.5	5.0	N
Eardley Ave	Evans Ave to Central Ave	187	397	444	3.7	0.5	5.0	N
	Lighthouse Ave to Evans Ave	187	397	444	3.8	0.5	5.0	N
Forest Ave	Spazier Ave to Sinex Ave	6,658	7,176	8,096	1.0	0.5	3.0	N
Lighthouse Ave	Wood St to Granite St	1,020	1,328	1,272	1.0	-0.2	5.0	N
	Pacific Ave to Granite St	1,020	1,328	1,272	1.0	-0.2	5.0	N
	Lobos Ave to Wood St	1,015	1,323	1,267	1.0	-0.2	5.0	N
	18Th St to 19Th St	2,365	2,836	3,054	1.0	0.3	5.0	N
	16Th St to 17Th St	3,880	4,569	4,941	1.1	0.3	5.0	N
	Forest Ave to 16Th St	3,880	4,569	4,941	1.0	0.3	5.0	N
	17Th St to 18Th St	3,901	4,590	4,965	1.0	0.3	5.0	N
Pine Ave	14Th St to 15Th St	2,081	3,225	3,635	2.4	0.5	5.0	N
	9Th St to 10Th St	2,428	3,483	3,662	1.8	0.2	5.0	N
	Carmel Ave to 12Th St	2,618	3,821	4,085	1.8	0.3	5.0	N
	13Th St to 14Th St	2,609	3,812	4,076	1.9	0.3	5.0	N
	12Th St to 13Th St	2,627	3,830	4,095	1.9	0.3	5.0	N
	Monterey Ave to 11Th St	2,428	3,483	3,662	1.8	0.2	5.0	N
	11Th St to Carmel Ave	2,608	3,809	4,070	1.9	0.3	5.0	N
	10Th St to Monterey Ave	2,428	3,483	3,662	1.8	0.2	5.0	N
	15Th St to Fountain Ave	2,081	3,225	3,635	2.4	0.5	5.0	N

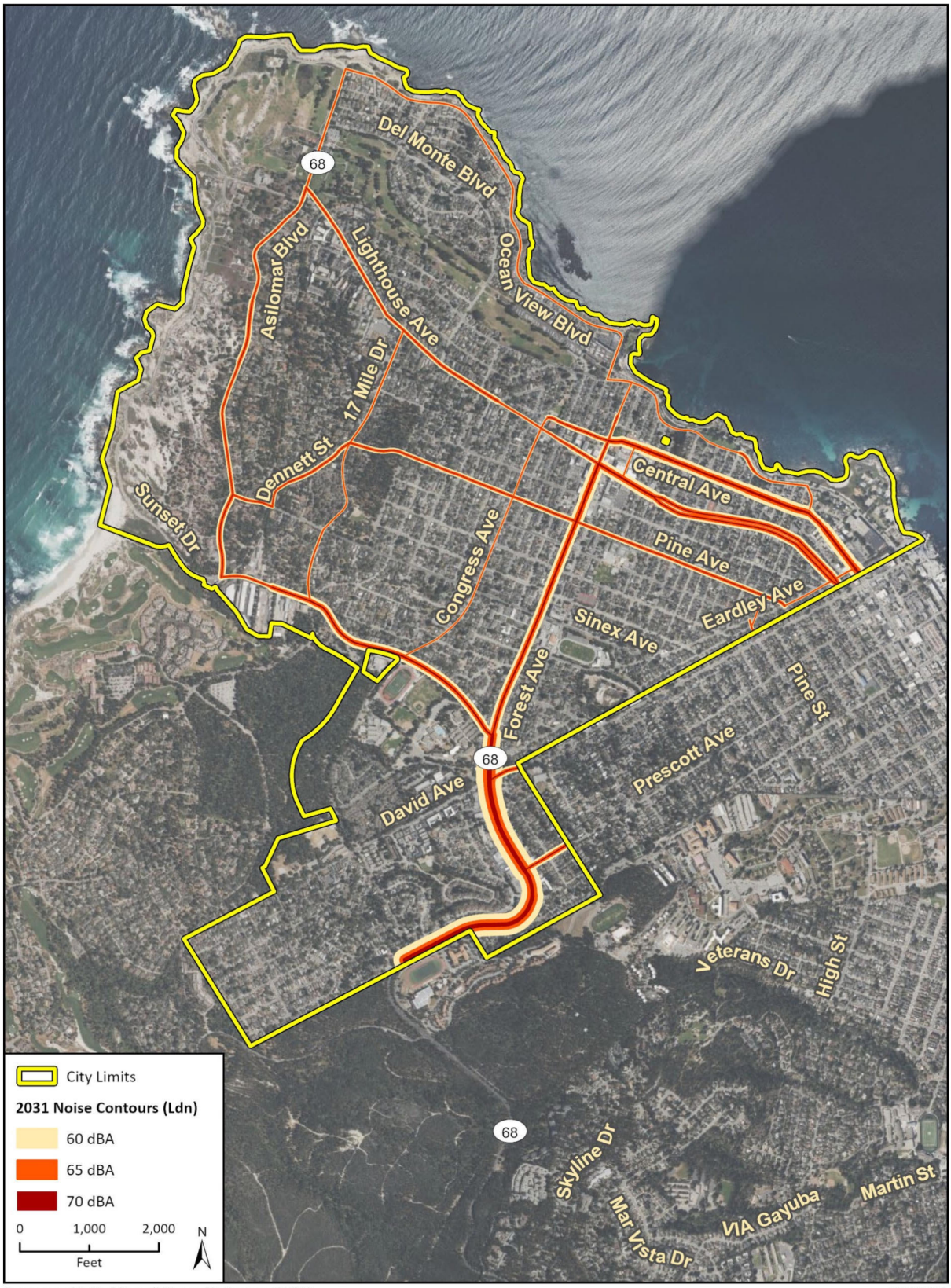
Roadway	Segment	Existing ADT	2031 No Project ADT	2031 Plus Project ADT	Cumulative Increase (2031 Plus Project – Existing) dBA (Ldn)	Project Cumulative Contribution (2031 Plus Project – 2031 No Project) dBA (Ldn)	Significance Threshold dBA	Significant? Y/N
	Grand Ave to Forest Ave	1,549	2,498	2,936	2.6	0.7	5.0	N
	Fountain Ave to Grand Ave	2,081	3,225	3,635	2.4	0.5	5.0	N
	1St St to 2nd St	2,440	3,507	3,687	1.7	0.2	5.0	N
	5Th St to 6Th St	2,699	3,801	4,005	1.7	0.2	5.0	N
	7Th St to 8Th St	2,772	3,874	4,078	1.5	0.2	5.0	N
	8Th St to 9Th St	2,428	3,483	3,662	1.8	0.2	5.0	N
	6Th St to 7Th St	2,699	3,801	4,005	1.7	0.2	5.0	N
	3Rd St to 4Th St	2,391	3,444	3,622	1.7	0.2	5.0	N
	4Th St to 5Th St	2,699	3,801	4,005	1.7	0.2	5.0	N
	2nd St to 3Rd St	2,391	3,444	3,622	1.8	0.2	5.0	N
	Eardley Ave/Spencer St to 1St St	2,444	3,498	3,677	1.6	0.2	5.0	N
Prescott Ln	Devisadero St/Seaview Ave to Devisadero St/Prescott Ave	6,679	7,978	8,535	1.1	0.3	5.0	N
	Devisadero St/Seaview Ave to Forest Ave	5,435	6,569	6,825	1.0	0.2	5.0	N
Spruce Ave	2nd St to Eardley Ave	640	852	951	1.9	0.5	5.0	N
	Line St/Pine St to 2nd St	659	874	974	1.7	0.5	5.0	N
Sunset Dr	17 Mile Dr/Maple St to Grove Acre Ave	6,663	8,273	8,752	1.2	0.2	5.0	N
	19Th St to Cedar St/Congress Ave	9,209	11,904	12,433	1.3	0.2	5.0	N

ADT = average daily trips

This table includes roadway segments with a cumulative increase (2031 Plus Project – Existing) dBA (Ldn) of 1 dBA or greater. All roadway segments are included in Appendix K.

Source: Kimley Horn 2025

Figure 4.11-2 Roadway Vehicle Noise Contours – 2031 with Project



Imagery provided by Microsoft Bing and its licensors © 2025.

23-14477 EPS
Fig X 2031 Noise Contours

Mitigation Measures

NOI-1(a) Measures to Reduce Construction Noise

To minimize noise during construction facilitated by the project, the City of Pacific Grove shall require construction contractors to implement as many of the following measures for construction activities conducted within the City as feasible. Construction plans submitted to the City shall include construction noise analysis and identify these measures on demolition, grading, and construction plans submitted to the City. The City of Pacific Grove Building Division shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading and/or building permits.

- **Mufflers.** During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
- **Stationary Equipment.** All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers.
- **Equipment Staging Areas.** Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers.
- **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction in compliance with applicable safety laws and regulations.
- **Electrically-Powered Tools and Facilities.** Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.
- **Noise Disturbance Coordinator**. The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator and the City shall be posted at the construction site.
- **Temporary Noise Barriers.** Erect temporary noise barriers when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA Leq at residential receivers, schools or other sensitive receptors during the daytime) or when the anticipated construction duration is greater than is typical (e.g., two years or greater) and there are sensitive receptors within 500 feet of the construction site. Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class 32 or higher.

NOI-1(b) Evaluate and Reduce Stationary Operational Noise

The City shall require applicants of development projects facilitated by the project and located within 50 feet of noise-sensitive uses (including but not limited to residences, schools, and medical care facilities) to evaluate potential on-site operational noise impacts on nearby noise-sensitive uses. The project applicant shall be required to implement stationary operational noise reduction measures if noise generated by operation of the project is anticipated to exceed the following noise levels established by the City's General Plan Health and Safety Element:

- An hourly L_{eq} of 50 dB or greater between 7:00 a.m. and 10:00 p.m.
- An hourly L_{eq} of 45 dB or greater between 10:00 p.m. and 7:00 a.m.
- A maximum sound level of 70 dB or greater between 7:00 a.m. and 10:00 p.m.
- A maximum sound level of 65 dB or greater between 10:00 p.m. and 7:00 a.m.

Examples of measures to reduce on-site noise include, but are not limited to, operational restrictions, selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers. Measures to reduce stationary operational noise shall be submitted to the City prior to issuance of building permits. Projects that are not anticipated to exceed the above noise levels shall not be required to implement stationary operational noise reduction measures.

Significance After Mitigation

Implementation of Mitigation Measure NOI-1(a), as well as implementation of goals, policies and programs of the City's General Plan would reduce potential impacts from noise during construction and operation by reducing noise source impacts and creating sound barriers where required/necessary. However, as exact details of future project-specific construction activities are unknown at this time, and because it may not be feasible to implement construction noise reduction measures to the extent that noise is reduced to an acceptable level, construction noise could still exceed the daytime significance threshold or potentially need to occur during the more sensitive nighttime hours. Consequently, although implementation of Mitigation Measure NOI-1(a) would reduce construction noise impacts, it cannot be guaranteed that construction noise impacts would be reduced to below the significance threshold of 80 dBA L_{eq} during the daytime at residential uses and other sensitive receptors in all cases. Therefore, the proposed project's construction noise impacts would remain significant and unavoidable.

Implementation of Mitigation Measure NOI-1(b) would reduce potential operational stationary noise impacts associated with development facilitated by the project. However, as exact details of future project-specific stationary noise activities are unknown at this stage of planning, stationary noise could still exceed operational noise limits. Therefore, operational stationary noise impacts would remain significant and unavoidable.

Threshold 2:	Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 CONSTRUCTION OF INDIVIDUAL DEVELOPMENT FACILITATED BY THE PROJECT COULD TEMPORARILY GENERATE GROUNDBORNE VIBRATION, POTENTIALLY AFFECTING ADJACENT SENSITIVE LAND USES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

The construction of individual development facilitated by the proposed project could intermittently generate strong vibration on and adjacent to construction sites. Typical construction equipment that produce vibration include pile drivers, vibratory rollers for paving, caisson drills, bulldozers, loaded trucks, and jackhammers. Table 4.11-7 lists groundborne vibration levels from various types of construction equipment at various distances.

Table 4.11-7 Vibration Levels for Typical Construction Equipment

Equipment		Approximate Vibration Level (in/sec PPV)			
		25 feet from Source	50 feet from Source	100 feet from Source	200 feet from Source
Caisson Drilling		0.089	0.031	0.011	0.004
Jackhammer		0.035	0.012	0.004	0.002
Large Bulldozer		0.089	0.031	0.011	0.004
Loaded Truck		0.076	0.027	0.010	0.003
Pile Driver (impact)	Upper range	1.519	0.537	0.190	0.067
	Typical	0.644	0.228	0.081	0.028
Pile Driver (sonic)	Upper range	0.734	0.260	0.092	0.032
	Typical	0.170	0.060	0.021	0.008
Small Bulldozer		0.003	0.001	<0.001	<0.001
Vibratory Roller		0.21	0.074	0.026	0.009

Source: FTA 2018.

Based on Table 4.11-7, buildings and structures could experience the strongest vibration during the use of pile-drivers and vibratory rollers. Vibration levels from pile-drivers could approach 1.519 in/sec PPV at a distance of 25 feet from the source and 0.190 in/sec at 100 feet, and vibration levels from vibratory rollers could approach 0.21 in/sec PPV at a distance of 25 feet and 0.026 at 100 feet. Pile-drivers are used to install deep foundation piers and vibratory rollers are used to compact soil, gravel, or asphalt. Pile-drivers and vibratory rollers are not used for every construction project. However, project-level details are not currently available for future projects that would be facilitated by the proposed project, and it cannot be guaranteed that future development would not involve use of pile-drivers or vibratory rollers. Therefore, vibration levels from these pieces of equipment are considered to provide a conservative analysis.

In terms of impacting residents, compliance with Section 11.96.040 of Pacific Grove Municipal Code would restrict the timing of construction activities authorized by a City permit to the hours of 8 a.m. to 6 p.m. Monday through Saturday and 10 a.m. to 5 p.m. on Sundays. This requirement for new development would protect residents from exposure to vibration during normal sleeping hours. In terms of impacting structures, the threshold for historic structures is 0.12 in/sec PPV, and the

threshold for non-historic buildings at 0.2 in/sec PPV (FTA 2018). As shown in Table 4.11-7, vibration levels associated with pile-drivers and vibratory rollers operating at a distance of 25 feet could exceed the threshold for non-historic structures and pile-drivers operating at a distance of up to 100 feet could exceed the threshold for historic and non-historic structures. Table 4.11-8 summarizes the distances at which construction equipment would exceed vibration thresholds.

Table 4.11-8 Distances at Which Vibration Levels for Typical Construction Equipment Exceed Vibration Thresholds

	Distance (feet) at Which Vibration Level (in/sec PPV) Exceeds Threshold[1]		
Equipment	Historic Structures	Timber /Masonry Buildings[2]	Engineered Concrete/ Masonry Buildings
Pile-Driver	135 feet	100 feet	75 feet
Vibratory Roller	40 feet	25 feet	25 feet
Dozer/Large Earthmoving Equipment	20 feet	15 feet	15 feet

[1] The threshold for historic structures is 0.12 in/sec PPV, and the threshold for non-historic buildings at 0.2 in/sec PPV (FTA 2018).

[2] Most residential buildings consist of non-engineered timber/masonry buildings.

In/sec PPV = inches per second peak particle velocity

Because most housing sites, upzoning areas, and additional parcels are located near or adjacent to existing structures, it is possible that construction of development facilitated by the project could generate vibration that exceeds applicable thresholds. In addition, as discussed in Section 4.4, *Cultural Resources,* historic-age structures are located throughout the city. Accordingly, future construction facilitated by the project may exceed applicable groundborne vibration thresholds. Impacts would be potentially significant and mitigation is required.

Operation

The project would primarily facilitate residential development, which do not typically generate vibration during operation. Commercial development facilitated by the project is not anticipated to involve industrial, high-intensity uses that could result in vibration during operation, such as mining operations or manufacturing uses. Therefore, project operational vibration impacts would be less than significant.

Mitigation Measures

Mitigation Measure NOI-1(a), described under Impact NOI-1, would be required. In addition, the following mitigation measure is required to reduce potential impacts from increased construction noise to the extent feasible.

NOI-2 Measures to Reduce Construction Vibration

Prior to issuance of a building permit for development facilitated by the project requiring any of the following activities, the project applicant shall prepare a groundborne noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these construction activities.

- Pile driving during construction within 135 feet of fragile structures such as historical resources
- Pile driving during construction within 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings)
- Pile driving during construction within 75 feet of engineered concrete and masonry (no plaster)

- Use of a vibratory roller within 40 feet of fragile historical resources or 25 feet of any other structure
- Use of a dozer or other large earthmoving equipment within 20 feet for a fragile historical structure or 15 feet of any other structure

This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The groundborne noise and vibration analysis shall include measures to ensure that vibration levels shall not exceed FTA architectural damage thresholds (e.g., 0.12 in/sec PPV for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower earthmoving equipment shall be used. If necessary, construction vibration monitoring shall be conducted to verify FTA vibration thresholds are not exceeded.

Significance After Mitigation

Implementation of Mitigation Measure NOI-1(a) and Mitigation Measure NOI-2 would reduce potential impacts from groundborne vibration to less than significant levels by requiring proper buffer distances to vibration-sensitive receptors depending on the type of construction equipment, or requiring alternative construction equipment to reduce vibration. Accordingly, construction vibration impacts would be less than significant with mitigation.

Operational vibration impacts would be less than significant without mitigation.

Threshold 3:	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact NOI-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE LOCATED OUTSIDE OF NOISE CONTOURS ASSOCIATED WITH NEARBY AIRPORTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Two airports are located in the vicinity of the City of Pacific Grove: the Monterey Regional Airport is located approximately 3.5 miles to the east, and Marina Municipal Airport is located approximately 8.7 miles to the northeast. Although the city is within the Monterey Regional Airport's airport influence area, the city lies outside the existing and projected future noise contours associated with both airports (Monterey County Airport Land Use Commission 2019a and 2019b). While new development facilitated by the project would be exposed to aircraft noise, the City's location outside noise contours associated with nearby airports indicates that noise exposure to sensitive land uses would be within acceptable levels. Therefore, the project would not expose people residing or working in the housing sites, upzoning areas, or additional parcels to excessive aircraft noise. Impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant and no mitigation is required.

4.11.4 Cumulative Impacts

Cumulative Construction Impacts

Noise

The geographic scope for cumulative construction noise impacts is the city of Pacific Grove plus a 0.25-mile radius around the city. This geographic scope is appropriate because construction of development facilitated by the project, in addition to cumulative development in Pacific Grove and surrounding areas, could temporarily increase ambient noise levels across the city if constructed at the same time. A 0.25-mile radius is appropriate as noise attenuates quickly with distance.

Cumulative projects that may be constructed simultaneously with buildout facilitated by the proposed project could, without mitigation, substantially increase noise levels in the vicinity of future projects. While unlikely, if construction of multiple, proximate cumulative projects occurs simultaneously, noise from individual construction projects could combine to create significant cumulative impacts. Although this scenario is unlikely as noise attenuates quickly with distance, cumulative construction noise impacts would be significant. As discussed in Impact NOI-1, Mitigation Measure NOI-1(a) and General Plan goals, policies, and programs would reduce noise from construction equipment associated with future individual development facilitated by the project. While mitigation measures would be implemented to the extent feasible, construction of development facilitated by the project would result in a considerable contribution to cumulative impacts related to a substantial temporary or permanent increase in ambient noise levels (Threshold 1).

Vibration

The geographic scope for cumulative construction vibration impacts is the housing sites, upzoning areas, and additional parcels plus a 100-foot radius. This geographic scope is appropriate because construction of development facilitated by the project, in addition to cumulative development in Pacific Grove and surrounding areas, could temporarily generate vibration in areas surrounding active construction sites if constructed at the same time. A 200-foot radius is appropriate as vibration attenuates quickly with distance and vibration that exceeds acceptable thresholds would occur within 100 feet of an active construction site.

Cumulative projects would produce temporary vibration impacts that would be localized to an individual project site and sensitive receivers in the immediate vicinity. Therefore, only sensitive receivers located in close proximity to each construction site would be potentially affected by each individual development. For the combined vibration impact from simultaneous construction projects to reach cumulatively significant levels, intense construction from these projects would have to occur simultaneously in close proximity to a sensitive receiver. This would most commonly occur when development projects using equipment that generates high vibration levels (e.g., pile driving) are proposed next to a historic building constructed of fragile building materials, which would be more sensitive to vibration damage than structures that were built based on modern building codes. As this is a possibility, construction vibration associated with cumulative projects would be significant.

As discussed in Impact NOI-2, Mitigation Measure NOI-2 would reduce vibration impacts associated with construction facilitated by the project. It is anticipated that Mitigation Measures NOI-1(a) and NOI-2 would substantially reduce/control construction vibration on a case-by-case basis such that

vibration levels would not exceed the Caltrans vibration criteria for building damage. Therefore, vibration impacts from construction activities related to the project would not result in a considerable contribution to cumulative vibration impacts (Threshold 2).

Cumulative Operational Impacts

Stationary Noise

The geographic scope for cumulative operational stationary noise impacts is the city of Pacific Grove plus a 0.25-mile radius around the city. This geographic scope is appropriate because operation of development facilitated by the project, in addition to cumulative development in Pacific Grove and surrounding areas, could permanently increase ambient noise levels if operated at the same time. A 0.25-mile radius is appropriate as noise attenuates quickly with distance.

Cumulative projects would introduce new stationary noise sources to the ambient noise environment in the project vicinity, including but not limited to noise from mechanical equipment, landscaping, people's voices, and amplified music. These sources may combine with other nearby cumulative projects to result in higher noise levels. Although this scenario is unlikely as operational noise from these sources is localized and rapidly attenuates within a developed setting due to the effects of intervening structures and topography that obscure noise, it is possible that operational stationary noise from cumulative development and development facilitated by the project could combine and exceed acceptable noise standards established by the City. Therefore, cumulative operational stationary noise impacts would be significant. As discussed in Impact NOI-1, Mitigation Measure NOI-1(b) would help reduce noise from stationary operational equipment associated with future individual development facilitated by the project. While this mitigation measure would be implemented to the extent feasible, the development facilitated by the project would result in a considerable contribution to cumulative impacts related to permanent increases in ambient noise (Threshold 1).

Traffic Noise

The geographic scope for cumulative traffic noise impacts is the city of Pacific Grove plus a 0.25-mile radius around the city. This geographic scope is appropriate because vehicle use associated with development facilitated by the project, in addition to cumulative development in Pacific Grove and surrounding areas, would increase traffic noise levels on roadways that provide access to Pacific Grove. A 0.25-mile radius is appropriate as noise attenuates quickly with distance.

Cumulative projects would result in increased traffic noise in the project vicinity. These sources may combine with other nearby cumulative projects to result in higher noise levels, and cumulative traffic noise impacts would be significant. As discussed in Impact NOI-1 and shown in Table 4.11-6, the project's contribution to traffic noise at each study roadway segment would be less than significant. Accordingly, the project would not have a cumulatively considerable contribution to cumulative traffic noise impacts (Threshold 1).

Vibration

The geographic scope for operational vibration impacts is the city of Pacific Grove. This geographic scope is appropriate because vibration attenuates quickly, and would be perceptible to receivers immediately nearby land uses that generate vibration.

There are minimal industrial uses in Pacific Grove that involve the routine use of equipment that would generate vibration. Therefore, cumulative impacts related to operational vibration would be less than significant (Threshold 2).

Airport Noise

The geographic scope for airport noise is the Monterey Regional Airport's noise contours. This geographic scope is appropriate because the Monterey Regional Airport is the nearest airport to the project area, and cumulative development within the noise contours would result in exposing residents or workers to excessive aircraft noise levels.

As discussed under Impact NOI-3, Pacific Grove is outside the existing and projected future noise contours of the Monterey Regional Airport. Therefore, cumulative impacts related to airport noise would be less than significant (Threshold 3).

4.12 Population and Housing

This section evaluates the potential population growth and potential displacement of housing impacts associated with implementation of the project.

4.12.1 Setting

Population, housing, and employment data are available on a city, county, regional, and state level.

a. Population

As shown in Table 4.12-1, Pacific Grove's estimated 2024 population is 14,966 people (California Department of Finance [DOF] 2024). Table 4.12-1 shows the city's population since 2010. The city's population has remained generally stable. The city's population decreased by approximately 0.5 percent between 2010 and 2024, which is less than the 1.9 percent population decrease in the county over the same period. Based on DOF data, the city's population increased slightly from 2010 to 2015, but then decreased between 2015 and 2022 with the largest decrease from 2021 to 2022. Following years of decline, the city's population increased from 2022 to 2024. The city's current population constitutes 3.4 percent of Monterey County's total population of 437,614 people. Pacific Grove is the seventh most populated city of the twelve cities in Monterey County. (DOF 2023, 2024).

Table 4.12-1 Population Growth in Pacific Grove

Year	Population	Growth Percentage
2010	15,041	
2011	15,048	0.04%
2012	15,150	0.01%
2013	15,287	0.9%
2014	15,262	-1.6%
2015	15,273	0.07%
2016	15,227	-0.3%
2017	15,217	-0.06%
2018	15,164	-0.3%
2019	15,113	-0.03%
2020	15,039	-0.5%
2021	14,968	-0.5%
2022	14,846	-0.8%
2023	14,872	0.2%
2024	14,966	0.6%

Sources: DOF 2023, 2024

b. Housing

A household is all people who live together in a housing unit (US Census Bureau 2024). Household counts do not include group quarters, such as board and care facilities, or emergency and temporary housing. A housing unit is defined as a separate living space that is occupied or intended to be occupied.

Housing Units

Table 4.12-2 shows the number of housing units in Pacific Grove for the years 2010, 2020, and 2024. Between 2010 and 2020, 48 housing units were removed from the city's housing inventory, with an average decrease of approximately five housing units per year. Three of the homes were single-family units, eight were mobile homes, and 37 were multifamily units. Between 2020 and 2024, 131 housing units were added to the city's housing inventory, an average increase of approximately 33 units per year. Eighty-four (84) new units were single-family units and 47 were multifamily units. No mobile homes have been added. In 2024, the city's vacancy rate was 16.6 percent, slightly more than double the county average of 8.0 percent (DOF 2023, 2024).

Table 4.12-2 Housing Units in Pacific Grove

	Single Family Homes		Multifamily Homes		Mobile Homes	Vacancy Rate	Total Household Units	Change Percentage
Year	Detached	Attached	Two to Four	Five Plus				
2010	4,727	499	1,110	1,682	151	14.1%	8,169	–
2020	4,718	511	1,084	1,665	143	16.6%	8,121	-0.6% (from 2010)
2024	4,776	537	1,099	1,697	143	16.6%	8,252	1.6% (from 2020)

Sources: DOF 2023, 2024

Household Size

Small households (one to two persons per household [pph]) traditionally reside in units with zero to two bedrooms; family households (three to four pph) normally reside in units with three to four bedrooms. Large households (five or more pph) typically reside in units with four or more bedrooms. However, the number of units in relation to the household size may also reflect preference and economics. Many small households obtain larger units, and some larger households live in small units for economic reasons.

Table 4.12-3 compares the size of households in Pacific Grove and Monterey County in 2010, 2020, and 2024. The city has maintained a lower average household size than the county. The average household size in the city increased from 2.09 pph in 2010 to 2.16 pph in 2020, but decreased to 2.12 pph in 2024. The average household size in the county increased from 3.15 pph in 2010 to 3.17 pph in 2020 and then decreased to 3.10 pph in 2023. The city's average household size is lower than the state average of 2.75 pph (DOF 2023, 2024).

Table 4.12-3 Household Size in Pacific Grove and Monterey County

	Pacific Grove		Monterey County	
Year	Household Size (pph)	Growth Percentage	Household Size (pph)	Growth Percentage
2010	2.09	–	3.15	–
2020	2.16	3.3%	3.17	0.6%
2024	2.12	-1.9%	3.10	-2.2%

Sources: DOF 2023, 2024

c. Employment

The jobs-to-housing ratio in a jurisdiction is an overall indicator of job availability within the area. A balance of jobs and housing is considered beneficial as it has the potential to provide residents with an opportunity to work locally and avoid employment commutes to other places in the region. As shown in Table 4.12-4, the Association of Monterey Bay Area Governments (AMBAG) 2026 Regional Growth Forecast estimates the 2023 employment in Pacific Grove to be 7,815 jobs. Using the 2023 AMBAG jobs data and the DOF 2024 housing unit estimate, the jobs-to-housing ratio is roughly 7,815 jobs per 8,252 housing units, or approximately 0.95, which reflects a jobs-housing balanced community (AMBAG 2024a; DOF 2024).

Table 4.12-4 Pacific Grove Population, Housing, and Employment Projections

	2024 Estimates	2030 AMBAG Projection[2]	2024-2030 Difference	2035 AMBAG Projection[2]	2024-2035 Difference
Population	14,966[1]	15,223	+257	15,404	+438
Housing Units	8,252[1]	8,559	+307	8,804	+552
Employment	7,815[2]	8,069	+254	8,163	+348
Jobs-to-housing Ratio	0.95	0.94	-0.01	0.93	-0.02

[1] Source: DOF 2024

[2] Source: AMBAG 2024a

AMBAG's profile for Pacific Grove breaks down employment by sector. As of 2023, "financial and professional services" was the most common employment category and "educational services, and health care and social assistance" was the most common industry in the city. The least common employment category was "agriculture (field work)" and the least common industry was "agriculture, forestry, fishing and hunting, and mining" (AMBAG 2024a, US Census 2023). The unemployment rate for Pacific Grove residents is 5.4 percent, which is higher than the unemployment rate for the county (3.6 percent). Approximately 86 percent of jobs in the city are conducted by people who reside outside of the city, and approximately 14 percent of jobs are conducted by city residents. Conversely, approximately 86 percent of city residents commute outside of the city for work. The employment commute inflow/outflow in the city is approximately equal in number (US Census Bureau 2022).

d. Projections

Table 4.12-4 presents the current estimates and 2035 projections regarding population, housing, and employment for the City of Pacific Grove (AMBAG 2024a). The projections for anticipated 2030 conditions estimate that the city's population will increase by 227 residents, and there will be an estimated addition of 307 housing units and 254 jobs compared to 2024 levels.

4.12.2 Regulatory Setting

a. State Regulations

California Government Code Section 65584

Pursuant to California Government Code Section 65584, the California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of

governments" (COG), AMBAG being the COG serving Monterey County and the City of Pacific Grove. HCD prepares an initial housing needs assessment and then coordinates with each COG to arrive at the final regional housing needs assessment.

Sustainable Communities and Climate Protection Act (SB 375, 2008)

Senate Bill (SB) 375 focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act, also known as Assembly Bill (AB) 32. SB 375 requires Metropolitan Planning Organizations (MPO) to develop a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP), with the purpose of identifying policies and strategies to reduce per capita passenger vehicle-generated GHG emissions. As set forth in SB 375, the SCS must: (1) identify the general location of land uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need; (4) identify a transportation network to service the regional transportation needs; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; (6) consider the state housing goals; (7) establish the land use development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, will reduce GHG emissions from automobiles and light-duty trucks to achieve GHG emission reduction targets set by the California Air Resources Board (CARB), if there is a feasible way to do so; and (8) comply with air quality requirements established under the Clean Air Act.

As the MPO, AMBAG is required to prepare certain documents, such as the Metropolitan Transportation Plan (MTP)/SCS, to ensure the region is eligible for transportation funding. To prepare the MTP/SCS, AMBAG works with the Regional Transportation Planning Agencies (San Benito Council of Governments, Santa Cruz County Regional Transportation Commission, and Transportation Agency for Monterey County); transit providers (San Benito County Local Transit Authority, Santa Cruz METRO, and Monterey-Salinas Transit); the Monterey Bay Air Resources District (MBARD); local, state and federal governments; and other organizations. The Monterey County RTP is based on regional growth assumptions included in the AMBAG Regional Growth Forecast. The 2050 MTP/SCS, which incorporates the Monterey County RTP, is currently being prepared using the adopted 2026 Regional Growth Forecast.

Housing Crisis Act (SB 330, 2019)

The Housing Crisis Act of 2019 (SB 330) seeks to accelerate housing production by eliminating some of the most common entitlement impediments to the creation of new housing. These may include delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. On September 16, 2021, SB 8 was signed into law which made some clarifications and updated SB 330, extending the Housing Crisis Act from January 1, 2025 to January 1, 2030.

State Housing Element Statutes

State housing element statutes (Government Code Sections 65580-65589.9) mandate that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. As a result, state housing policy rests largely upon the effective implementation of local general plans and in particular, housing elements. Additionally, Government Code Section 65588 dictates that housing elements must be updated at least once every eight years. In accordance with Government Code Section 65585, HCD must certify that a local jurisdiction's housing element is in compliance with state housing element law.

Government Code Section 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. The housing element must also identify a zone, or zones, where emergency shelters are a permitted use without discretionary review (Government Code Section 65583[a][4]) and demonstrate that transitional housing and supportive housing are considered a residential use and subject to only those restrictions that apply to other residential dwellings of the same type in the same zone (Government Code Section 65583[a][5]).

Additionally, if jurisdictions include previously identified sites to meet its Regional Housing Needs Allocation (RHNA) for the development of units that can accommodate lower-income households, or must rezone sites to a higher density to meet a shortfall of sites for lower-income households, the jurisdiction must commit to rezoning sites to allow developments by-right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower income households.

Streamlined Ministerial Approval for Affordable Projects (SB 35 and SB 423)

SB 35 provides a CEQA-exempt, time-limited ministerial approval process (90 to 180 days, depending upon whether the project has more or less than 150 units), for residential and mixed-use projects for jurisdictions that are not making sufficient progress toward their RHNA. Projects that qualify for this streamlined approval process must comply with a jurisdiction’s objective standards, meet qualifying criteria designed to capture infill sites, meet certain requirements regarding construction workforce labor, and meet significant affordable requirements. SB 423 extended the sunset date of this law from 2026 to 2036 and amended provisions regarding the law’s applicability in the coastal zone.

AB 1218 (2023)

State housing law (Government Code Sections 66300.5 and 66300.6) requires that all development projects, including housing development projects and non-housing development projects, must replace any existing protected units on site and provide relocation benefits to existing occupants of protected units that are lower-income households. Replacement housing for non-housing projects must be developed prior to or concurrently with the development project and may be located on a site other than the project site but must be located within the same jurisdiction.

b. Regional and Local Regulations

AMBAG Regional Housing Needs Assessment

California's Housing Element law requires that each county and city develop local housing programs to meet their "fair share" of future state-wide housing growth needs for all income groups, as determined by DOF. The regional councils of government, including AMBAG, are then tasked with distributing the state-projected housing growth need for their region among their city and county jurisdictions by income category. This fair share allocation is referred to as the RHNA process. The RHNA represents the minimum number of housing units each community is required to plan for through a combination of: 1) zoning "adequate sites" at suitable densities to provide affordability; and 2) housing programs to support production of below-market rate units. Pacific Grove's allocation from the 2023-2031 RHNA, distributed among the four income categories, is shown in Table 4.12-5.

Table 4.12-5 Regional Housing Needs Assessment 2023 – 2031

	Pacific Grove		AMBAG Region	
Income Group	**RHNA Allocation**	**Percent of Total**	**RHNA Allocation**	**Percent of Total**
Very Low	362	32%	7,868	24%
Low	237	21%	5,146	15%
Moderate	142	13%	6,167	19%
Above Moderate	384	34%	14,093	42%
Total	**1,125**	**100%**	**33,274**	**100%**

Note: Totals may not add up due to rounding.

Source: AMBAG 2022

As noted under Government Code Section 65589.5(a), the legislature has concluded that "the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California." As further acknowledged by the legislature, the lack of housing can result in…. reduced mobility, urban sprawl, excessive commuting, and air quality deterioration. The General Plan contains state mandated policies and analysis to ensure that the City "facilitate[s] the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community" (Government Code Section 65580[d]). More specifically, the Legislature's stated intent is "to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal" (Government Code Section 65581).

City of Pacific Grove General Plan

The City of Pacific Grove adopted an updated General Plan in 1994. The General Plan serves as the principal policy document guiding future conservation and development of the city through policies included within the General Plan. The General Plan's policies address land use, housing, transportation, parks and recreation, natural resources, historic and archaeological resources, urban structure and design, public facilities, and health and safety.

The Housing Element of the General Plan is prepared pursuant to state law and provides planning guidance in meeting the housing needs identified in AMBAG's RHNA. The Housing Element identifies

the City's housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy. The 2015-2023 Housing Element (responsive to the 5th cycle RHNA) was adopted by the City Council in March 2016. This DEIR analyzes impacts related to implementation of the City's draft 6th cycle Housing Element (2023-2031).

Local Coastal Program

The City of Pacific Grove adopted a Local Coastal Program (LCP) in 2020. The LCP is comprised of the Land Use Plan and Implementation Plan, which govern land use and development in the Pacific Grove Coastal Zone. The coastal zone is made up of approximately 458 acres in the northern tip of the city and extends offshore three nautical miles from the mean high tide line.

Pacific Grove Municipal Code

Title 23 of the Pacific Grove Municipal Code contains zoning regulations for land in the city. Zoning regulations provide for the types and densities of residential and other uses permitted in each of the City's zones. Zoning in the city establishes the maximum allowable development in a zone. Zoning also includes height limitations and other development standards which together regulate setbacks, building heights, floor area ratios, open space and parking for each parcel within the city, as applicable.

4.12.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The project's impacts related to population and housing are evaluated based on the project's adherence to state, regional, and local regulations and the estimated changes in population, housing, and employment relative to the growth estimated in planning documents, particularly the City's 1994 General Plan and the AMBAG 2026 Regional Growth Forecast. The project does not involve specific development projects and so the project itself would not result in direct physical changes to population or housing. However, effects on population and housing could occur as a result of the proposed zoning changes. Future development projects could replace existing housing units or add new units, increasing the city's population. Population growth could result in physical changes related to transportation, air quality, noise, public services and utilities, and other environmental resource areas. These physical impacts are analyzed under the other environmental topics in this DEIR.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on population and housing if it would:

1. 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); and/or
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Although CEQA requires an EIR to consider a project's growth-inducing impacts, CEQA provides that the EIR "should not assume that growth is necessarily beneficial, detrimental, or of little significance." The underlying purpose of the project is to accommodate housing needs, which includes needs as a result of anticipated population growth in the city. Even substantial growth may not be considered a significant impact if it aligns with growth projections for the city that can be accommodated by existing or planned facilities and services, and is consistent with the City's General Plan, as well as state and regional policies and regulations. As such, a significant impact for purposes of this Threshold Question 1 is whether the updates to the project would occur if the project would induce unplanned growth. For Threshold 2, "substantial" displacement would occur if allowed land uses would displace more residences than would be accommodated through growth facilitated by the project.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project 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)?

Impact POP-1 THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY INDUCE SUBSTANTIAL UNPLANNED GROWTH. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

For purposes of analysis, "substantial" unplanned population growth is defined as growth exceeding that forecasted in existing local and regional plans, including the 2023-2031 RHNA, the AMBAG 2026 Regional Growth Forecast, and the existing General Plan.

2023-2031 RHNA and AMBAG 2026 Regional Growth Forecast

The project would increase the development capacity of the city through the rezoning of certain selected parcels to meet the City's final RHNA allocation for the 6th cycle planning period. As noted in Chapter 2, *Project Description* (refer to Table 2-11), and shown in Table 4.12-6, the net increase in development potential accommodated by the project would be 2,335 housing units and 292,578 square feet of commercial space. This DEIR assumes an additional 4,950 residents associated with the additional housing units using the city's 2024 average persons per household of 2.12 (DOF 2024). The buildout year for this analysis is 2031, the end of the City's 6th housing cycle. With the buildout of the project by 2031, the city would have a total of 10,587 housing units and a population of 19,916 residents.

Table 4.12-6 Project Growth Potential Compared to AMBAG 2026 Regional Growth Forecast

	Existing Conditions (2024)	Project Growth Potential (Net Increase from Existing) (2031)	AMBAG 2026 Regional Growth Forecast 2024-2031 Growth Projection[1]	Difference Between Project Net Increase and 2026 AMBAG Growth Forecast
Housing Units (units)	8,252[2]	2,335	356	+1,979
Population (residents)	14,966[3]	4,950	293	+4,657
Employment (jobs)	7,815[3,4]	400	273	+127

[1] 2031 growth projection calculated based on a linear interpolation of 2030 and 2035 projections. Source: AMBAG 2024a.

[2] Source: DOF 2024

[3] Source: AMBAG 2024a

[4] The employment existing condition data is from 2023.

The AMBAG 2026 Regional Growth Forecast provides 2030 and 2035 development projections. The projected 2031 population and housing numbers were interpolated from the Regional Growth Forecast projections using the average percent growth per year for the city. The Regional Growth Forecast projects the city's population to increase by 181 residents between 2030 and 2035. Divided by 5 years, the average annual growth rate of approximately 36 people per year. Adding 36 residents to the 257 population increase anticipated by 2030, it can be assumed that the Regional Growth Forecast projects 293 additional residents in Pacific Grove from 2024 to 2031. The Regional Growth Forecast projects the city's housing units to increase by 245 units between 2030 and 2035. Using the same methodology, the city can anticipate an increase of approximately 49 housing units per year (307 units divided by 5 years). Adding 49 units to the 307 housing unit increase anticipated by 2030, it can be assumed that the Regional Growth Forecast projects 356 additional units in the city from 2024 to 2031.

Table 4.12-6 indicates the population, housing, and employment anticipated to be facilitated by the project for 2024 through 2031 compared to the AMBAG 2026 Regional Growth Forecast. The project would exceed the AMBAG 2026 Regional Growth Forecast anticipated increase for Pacific Grove by 1,979 housing units and 4,657 residents.

The AMBAG 2026 Regional Growth Forecast does not specifically take into account the 6th Cycle RHNA, but the Regional Growth Forecast accommodates the increase in housing units mandated by the 6th Cycle RHNA in order for the AMBAG MTP/SCS to meet the state's statutory requirement (AMBAG 2024b). The growth projections of the project analyzed in this DEIR assume a residential buildout of up to 100 percent of the maximum density, which is higher than the realistic development scenario and well above the average population growth rate over the last 15 years. In contrast, the AMBAG 2026 Regional Growth Forecast projects a more realistic and refined growth scenario based on widely accepted forecasting methodologies using input from local jurisdictions, including each jurisdiction's General Plan updates, as well as regional, statewide, and national trends. The 2031 population forecast in the AMBAG 2026 Regional Growth Forecast does not represent the maximum theoretical buildout capacity of the project's land use and zoning changes on individual sites but rather represents a reasonable estimate of the city's population, housing, and employment on the ground based on economic and demographic trends.

The methodology to develop the population, housing, and employment forecast estimates for the Monterey Bay region consisted of two distinct stages. The first stage was the identification of regional and county level forecast figures through the use of widely accepted forecasting methodologies. The second stage was the disaggregation of county-level forecast numbers to the jurisdictional level (AMBAG 2025). The AMBAG 2026 Regional Growth Forecast methodology incorporates several data sources such as the 2020 Census, the American Community Survey, and new estimates from DOF, and is refined with input from local government agencies. The forecast incorporates the following information (AMBAG 2023):

- **Employment.** Employment growth by industry is driven by projected national and statewide trends for all industries in the region using a shift-share model with input from the population model through the working-age population forecast.
- **Population.** Fertility, mortality, and migration trends influence population growth. Employment forecast influences migration levels.
- **Household Population and Households.** Demographic factors (e.g., age, sex, race/ethnicity) and external factors (e.g., major group quarters facilities like colleges and universities, correctional facilities, etc.) influence the household population and household formation rates (i.e., the number of people per household).

- **Housing Units.** Housing projections are driven by the household population projection, demographic characteristics of the household population (age, sex, race/ethnicity), household formation rates, and housing vacancy rates.

Since the Regional Growth Forecast is updated with every iteration of the MTP/SCS, the forecast will be updated in future years to reflect changes associated with updates to each jurisdiction's General Plan, including land use designations. The subsequent iteration of the Regional Growth Forecast will also need to accommodate the state's statutory requirement for the regional housing need. Although the project would facilitate development beyond what is forecast for the city in the AMBAG 2026 Regional Growth Forecast, the project would be consistent with state requirements since it facilitates the City's ability to develop housing units at sufficient densities to achieve the City's RHNA and state objectives for the 6th housing cycle. As discussed in Chapter 2, *Project Description*, the City is considering 15 additional parcels in addition to the Housing Element Site Inventory to accommodate additional housing development in the city. These additional parcels may replace sites in the Site Inventory or be added to the Site Inventory. As described in Table 2-9, some of the additional parcels would require a modification to the land use or zoning designation to allow or increase residential density, which may occur at a later date. Subsequent iterations of the AMBAG Regional Growth Forecast would consider these changes to land use and zoning on the sites evaluated in this DEIR. The project would facilitate the orderly increase of residential capacity on specific sites in the city to meet state requirements and the city's share of regional housing need. As such, the project would be consistent with the 2023-2031 RHNA and the AMBAG 2026 Regional Growth Forecast.

Pacific Grove General Plan Buildout

The existing General Plan's Land Use Element (amended in 2018) anticipated a total buildout potential of 13,133 housing units in the city.[1] Since there are an estimated 8,252 units in the city as of 2024, the 2,335 housing units associated with the proposed project would increase the total number of units in the city to 10,587 units. In other words, the project would not exceed the buildout potential of the existing General Plan and would be consistent with Land Use Element's population and housing projections. The Land Use Element anticipated most of those units to be in multifamily and commercial districts, consistent with the locations of the increase in housing units that would occur from land use and zoning changes proposed by the project.

Indirect Population and Housing Growth

The project would also facilitate the development of up to 292,578 additional square feet of commercial space, which would generate employment opportunities for existing and potential residents.[2] Job growth facilitated by the project would provide employment opportunities for existing residents as well as new residents facilitated by the project through increased housing

[1] The Land Use Element buildout assumptions include the units that can be accommodated with the city's land use and zoning designations plus the addition of 3,426 second units on single-family residential parcels (see page 12 of the Land Use Element). The Land Use Element acknowledges that this number of second units is unlikely to be realized based on the development trends at the time that the Land Use Element was updated (2018). The City's 6th Cycle Housing Element also considers the potential development of 224 second units (now called Accessory Dwelling Units) by the end of 2031 based on a review of development trends from 2019-2023. Accessory Dwelling Units are not included in the buildout assumptions analyzed in this DEIR. The Land Use Element estimates the development of 2,000 units from intensification of use on current sites, subdivision of lots, development of buildable lots, and vacant lots, with development occurring at a "measured pace" over time.

[2] The project buildout assumes commercial parcels proposed for upzoning will be developed as mixed-use sites, with 40 percent of the allowed Floor Area Ratio (FAR) allocated for commercial space. This assumption aligns with recent mixed-use development and historic growth trends in these areas.

opportunities. A study on Pacific Grove's 2023-2024 Fiscal Year sales tax generated from targeted retail categories indicates that there is unmet demand in several categories, including family apparel, department stores, quick-service restaurants, and electronics stores (City of Pacific Grove 2024). This retail supply and demand gap suggests a high likelihood of development with a commercial or retail component in the Downtown and Central-Eardley Districts where retail is concentrated. It is anticipated that the maximum buildout of commercial development facilitated by the project would generate 400 jobs. Development facilitated by the project on identified housing sites, upzoning areas, and additional parcels would accommodate a realistic development of 710 units affordable to lower and moderate-income households.

As discussed in the draft Housing Element, Pacific Grove workers tend to earn significantly less than Pacific Grove residents (draft Housing Element Chapter 1, Housing Needs and Constraints Assessment). High housing prices and lack of multifamily housing in Pacific Grove have made it difficult for many lower-income employees to find affordable living options within the city. Since the project would facilitate the development of up to 710 units affordable to lower- and moderate-income households, it is anticipated that a portion of the jobs associated with the additional commercial development would be held by city residents occupying the new residential units. Given the commute trends described in Section 4.12.1, *Setting*, it is reasonable to assume that a portion of the jobs associated with the additional commercial development would be filled by existing residents in the region who would commute to Pacific Grove. It is not anticipated that the job growth facilitated by the project would require additional residents to move to the city to fill those positions or necessitate the development of housing elsewhere in the region, thus contributing to unanticipated population growth. Therefore, the additional commercial space facilitated by the project would not result in additional population growth not already addressed in this analysis.

Housing and commercial sites to be rezoned or upzoned under the project are primarily infill sites proximate to jobs, transportation, shopping and schools, and generally located in the city's main areas of employment (e.g., Downtown and Forest Hill), which would reduce the need for additional or secondary infrastructure due to population growth. While the proposed project primarily facilitates housing development, an estimated 400 new jobs would be generated by the commercial component of the proposed project. The jobs-to-housing ratio would be reduced from 0.93 (based on AMBAG's 2035 projections) to 0.77.[3] Although the jobs-to-housing ratio would no longer be balanced, the reduction in the ratio would not be expected to result in additional population growth in the project area, as it reflects a deficit of job availability in the city.

The project would not facilitate the development of new roads or infrastructure that would indirectly induce unplanned population growth, because none of the sites are large parcels that would require new roads, and future development on the proposed sites would be considered infill development or redevelopment that would be supported by existing roads and infrastructure. As discussed in Section 4.16, *Utilities and Service Systems*, development in the city is already supported by existing infrastructure, even in the relatively few vacant areas available for new development.

Conclusion

Future development facilitated by the project would be consistent with the 2023-2031 RHNA, the existing General Plan, and AMBAG 2026 Regional Growth forecast. The project would update the existing General Plan to be consistent with the RHNA, and subsequent AMBAG Regional Growth Forecast would incorporate the City's land use and zoning changes facilitated by the project. The

[3] (8,163 jobs in 2035 predicted by AMBAG plus 400 jobs facilitated by the project) divided by (8,804 housing units in 2035 predicted by AMBAG plus 2,335 housing units facilitated by the project).

project does not include the extension of roadways or other infrastructure. Therefore, the project would not induce substantial unplanned population growth, either directly or indirectly, and impacts would be less than significant.

Mitigation Measure

No mitigation is required.

Threshold 2:	Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact POP-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING OR PEOPLE, NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would accommodate new development and redevelopment projects in the city through rezoning and upzoning to facilitate development with higher residential densities than previously allowed on those sites.

Identified housing sites, upzoning areas, and additional parcels may contain existing housing units, and the proposed redevelopment of these sites, areas, and parcels may result in the displacement of residents. There are six sites with existing single-family residential uses and two sites with existing multi-family uses included in the Site Inventory of the proposed 6th Cycle Housing Element. Properties with existing residential uses are characterized as underutilized as they primarily consist of larger parcels located in the city's residential and commercial zones. None of these sites have existing lower-income restricted units that would require a replacement program upon redevelopment, as required under Government Code Sections 66300.5 and 66300.6. The 15 additional parcels included as part of the proposed project are located on vacant and underutilized parcels throughout the city. Some of these sites have existing housing units. Development on additional parcels that contain existing housing units must replace any existing protected units and provide relocation benefits to existing occupants of protected units that are lower-income households per state housing law, either on the same site or another site in the city.

The project, which includes the Housing Element Update and proposed rezoning and upzoning of specific sites, is limited to policy and development standard amendments. While the project does change the development potential for specific sites and parcels in the city, it does not include or permit specific development on any site. Therefore, the project itself would not demolish existing structures nor displace any existing people or housing. The project would create capacity for 2,335 housing units through the facilitation of new development and redevelopment of nonvacant sites, and would support the development of housing units in greater numbers than the number of units that may be demolished.

All city residents who rent are provided with some protection and compensation under AB 1482 and SB 567, which amended Sections 1946.2 and 1947.12 of the California Civil Code. These amendments provide statewide tenant protections, including limits on rent increases, protections from evictions without cause, and relocation fees for no-fault evictions (State of California 2023). Additionally, the City's Housing Element Update, which is included in the project, contains policies and programs to reduce the risk of displacement of existing residents. Guided by the Housing Element Update, the City would support the production of affordable housing development, which would provide housing opportunities for lower-income households. The City would also develop a

rental assistance program which would include recommendations for policy actions that would provide relief to tenants and landlords to avoid the displacement of vulnerable communities.

The project would facilitate the redevelopment of identified housing sites, upzoning areas, and additional parcels with existing housing units, resulting in displacement of the residents of those households. However, displacements that may occur would not necessitate construction of housing elsewhere, as a net increase in housing would be accommodated in the city. With incorporation of state law, goals, and policies to reduce risk of displacement of existing residents and support tenant protections, the project would minimize potential impacts related to displacement of existing housing and residents. Impacts related to displacement of existing residences would be less than significant.

Mitigation Measure

No mitigation is required.

4.12.4 Cumulative Impacts

The geographic scope for cumulative population and housing impacts is the Pacific Grove City Limits. This geographic scope is appropriate for population and housing because projections at this level are used to estimate the need for public services and other government facilities and programs. Regional cumulative impacts consider impacts that would occur from the buildout of cumulative planning documents and reasonably anticipated projects identified in Chapter 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this DEIR is discussed in Chapter 3, *Environmental Setting*.

Cumulative development would result in population growth. However, cumulative development would be required to adhere to applicable zoning and development regulations and General Plan policies to mitigate environmental impacts where feasible and would undergo environmental review, including consideration of whether the projects would induce unplanned population growth. Growth within nearby jurisdictions would be facilitated by long-range planning efforts, therefore, cumulative impacts related to growth inducement (Threshold 1) would be less than significant.

Cumulative development may involve the displacement of existing housing units, necessitating the construction of additional housing elsewhere. However, Government Code Sections 66300.5 and 66300.6 requires the implementation of a housing replacement program for projects that would remove lower-income restricted units, and substantial housing displacement is not anticipated. With adherence to Government Code requirements, cumulative impacts related to the displacement of people or residences (Threshold 2) would be less than significant.

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4.13 Public Services and Recreation

This section describes existing public services and recreational facilities in the project area and assesses the potential impacts to public services, including fire protection, police, schools, libraries, parks, and recreational facilities, resulting from implementation of the proposed project.

4.13.1 Setting

a. Fire Protection Services

Pacific Grove is serviced by the Monterey Fire Department (MFD). MFD is made up of 79 personnel and six stations. The City is served by one MFD fire station, Station 4, which is located at 600 Pine Avenue (Figure 4.13-1). Station 4 operates one fire engine and there are three fire captains, three fire engineers, and three firefighters/paramedics assigned to Station 4. The station operates with three shifts per day, so that the station is staffed 24 hours per day by one fire captain, one fire engineer, and one firefighter/paramedic. MFD's current (2025) fire insurance rating is 2 (MFD 2025). MFD responded to 9,899 incidents in 2024 (City of Monterey 2024).

Station 4 protects a geographical area of 2.5 square miles. Between September 2024 and February 2025, Station 4 responded to an average of 180 calls per month and had an average response time to emergency calls of 4 minutes and 4 seconds (MFD 2025). Station 4 responds to an average of 1,450 calls a year (City of Pacific Grove 2025). MFD also has a mutual aid agreement with Monterey County Regional Fire District who has mutual agreements with the California Office of Emergency Services, State Fire Marshal, United States Forest Service, National Park Service, and Bureau of Land Management, and the Department of Defense. Table 4.13-1 summarizes the type and number of incidents MFD Station 4 responded to in 2024.

Table 4.13-1 Monterey Fire Department Station No. 4 Incidents, 2024

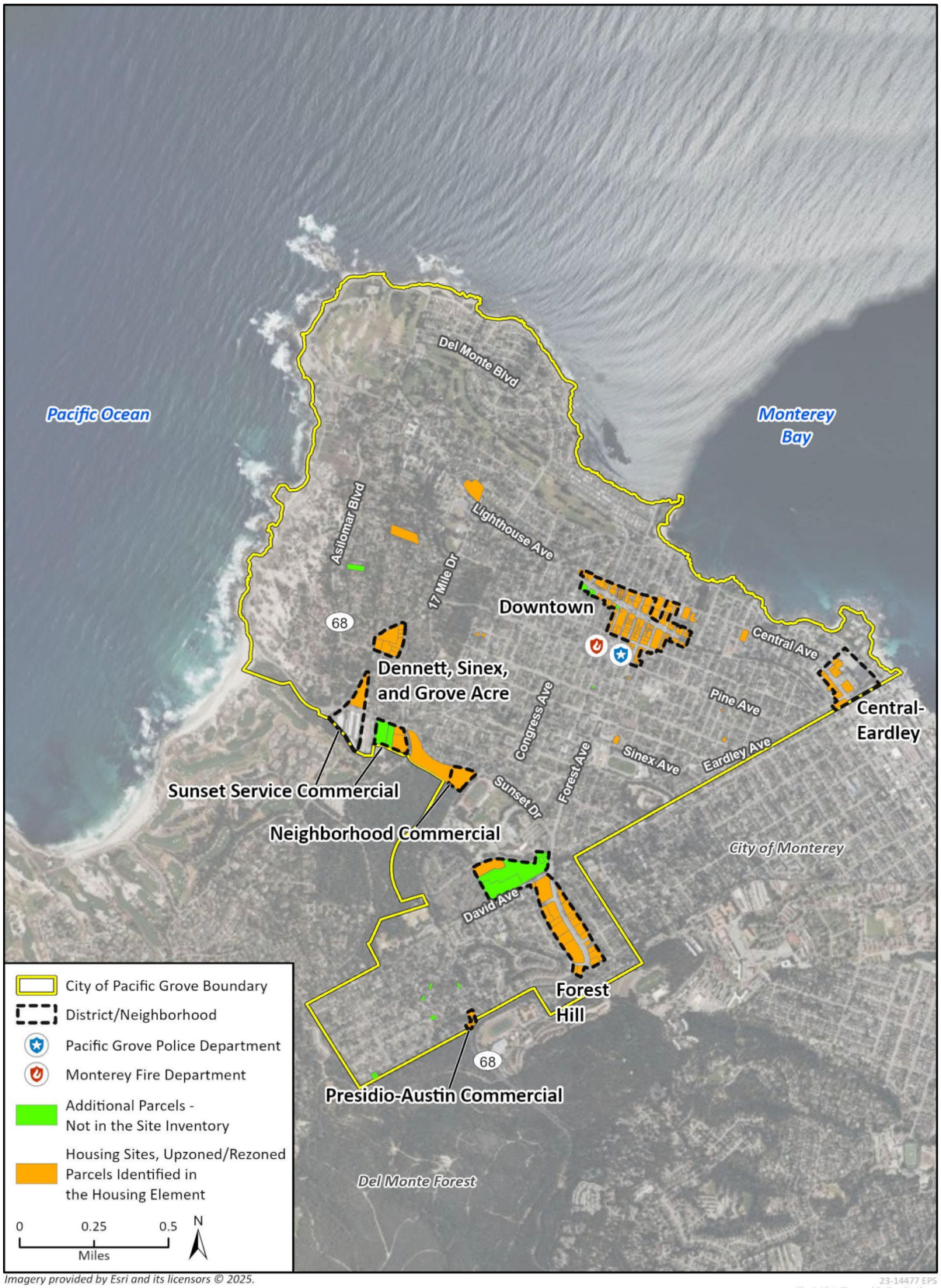
Type of Incident	Number of Incidents	Percent of Total (%)
Fire	16	0.77
EMS	1,095	52.7
Rescue	65	3.1
Hazardous Condition	93	4.5
Service Calls	607	29.2
Severe Weather	6	0.30
False Alarms	194	9.3
Total All Incidents	**2,076**	

Source: City of Pacific Grove 2024

b. Police Services

The Pacific Grove Police Department (PGPD) provides law enforcement services to the City of Pacific Grove. PGPD headquarters is located at 580 Pine Avenue. Staffed by approximately 22 sworn officers and 10 support professionals, PGPD comprises two primary divisions, including Patrol Operations and Administrative Services (City of Pacific Grove 2025a). PGPD maintains mutual aid agreements with the police departments of Marina, Seaside, Sand City, Del Rey Oaks, Monterey, Carmel-by-the-Sea, and the Monterey County Sheriff's Office.

Figure 4.13-1 Pacific Grove Fire and Police Stations



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Additional data provided by City of Pacific Grove, 2025.

23-14477 EPS
Fig 4.13-1 Fire and Police Stations

PGPD Patrol Operations is responsible for law enforcement, citizen assistance, responding to emergency situations, school resources, and investigations. Patrol Operations includes a Community Service Program and School Resource Program. The Community Service Officer Program was created in 2021 and responds to animal control calls, public health order violations, close patrols of Lovers Point and Recreation Trail, parking enforcement, and a variety of municipal code violations. In addition to enforcement, they assist with public outreach and community efforts. As part of the School Resource Program, PGPD collaborates with Pacific Grove Unified School District (PGUSD) to assign one officer to monitor all district school sites. The School Resource Officer is trained to work proactively with students and staff. Further, School Resource Officers teach safety programs and attend after-school activities and events. Pacific Grove is patrolled by deputies 24 hours a day, 7 days a week. The Administrative Services Division is responsible for the internal departments that provide structure and help operate PGPD.

Police response times can vary significantly, depending on the location of patrol cars at the time of a call. According to the Health and Safety Element of the Pacific Grove General Plan, one of the Pacific Grove Police Department goals is to prevent crime and promote the protection of people and property by providing a minimum response time for Priority 1 (emergency) calls and encouraging the use of private patrols and security personnel in large residential and commercial developments to supplement police services. PGPD's current average response time is four minutes and 26 seconds (PGPD 2025).

c. Schools

PGUSD is the public school district that serves Pacific Grove. PGUSD's boundaries consist of Pacific Grove's city limits and a portion of the census-designated place of Pebble Beach. PGUSD provides various educational opportunities through its facilities, which includes eight total schools: two preschools, two elementary schools, one middle school, two high schools, and one adult education school (PGUSD 2025). Table 4.13-2 lists each PGUSD school in Pacific Grove.

Table 4.13-2 PGUSD Schools Located in Pacific Grove

School	Grade Level	Current Enrollment (2023-2024)[1, 2]
Co-Op Preschool	TK	16
State Preschool	TK	6
Forest Grove Elementary	TK-5	345
Robert Down Elementary	TK-5	403
Pacific Grove Middle School	6-8	445
Pacific Grove High School	9-12	520
Community High School	9-12	14
Pacific Grove Adult School	Adult Education	1,986

[1] California Department of Education 2025a

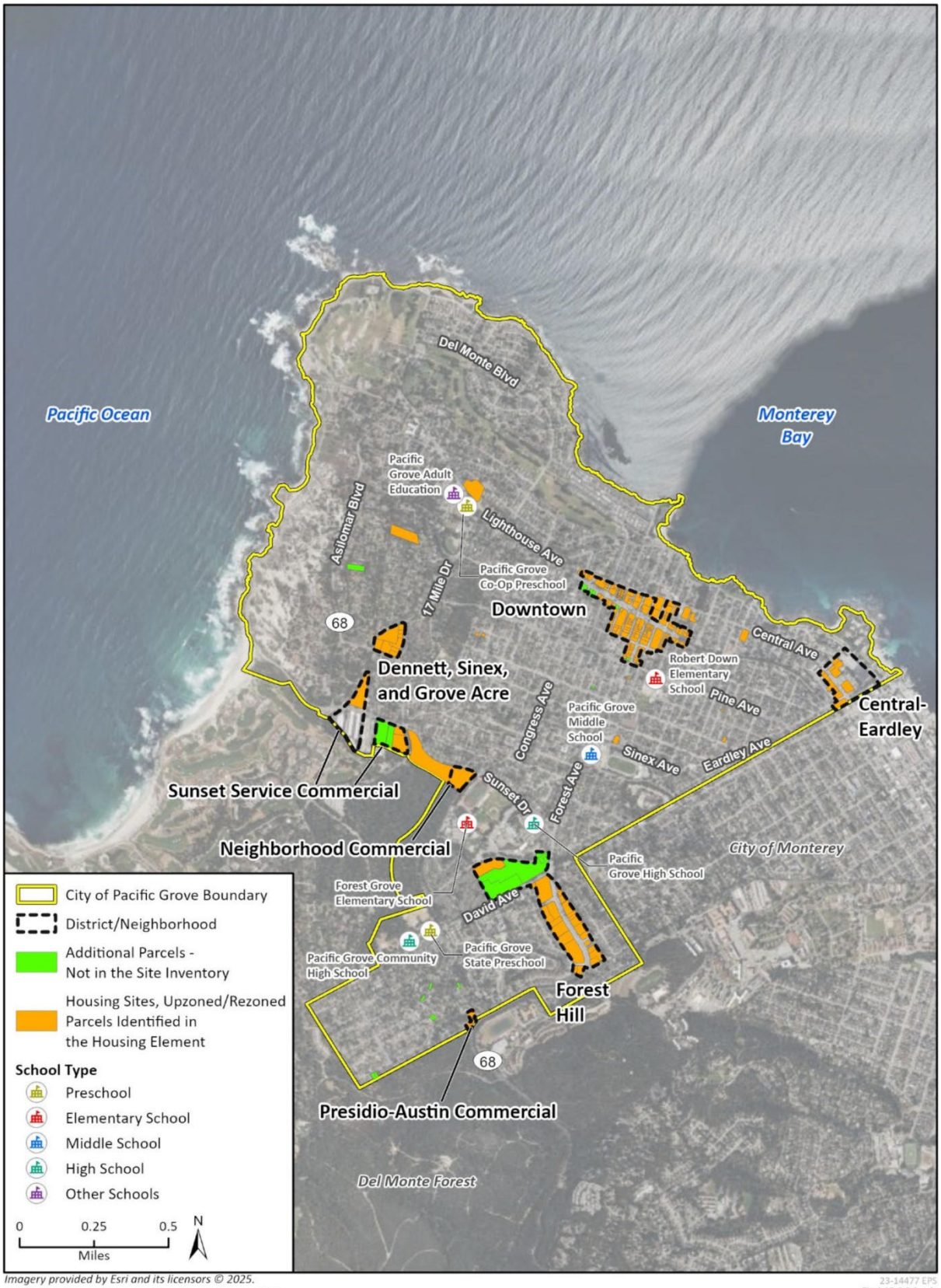
[2] Jorn 2025

TK = transitional kindergarten

In the last 10 years, PGUSD's enrollment peaked at 2,091 students in the 2017-2018 school year (California Department of Education 2025a). Consistent with statewide and nationwide trends reflecting lower birth rates and changing demographics, PGUSD enrollment has decreased in recent years, with district-wide enrollment declining by 364 students since 2018 (California Department of Education 2025a; 2025b). The California Department of Finance projects enrollment of under 5.2 million across the state by 2032 (California Department of Finance 2024).

Pursuant to Government Code section 65995 and Education Code section 17620 *et. Seq.*, the governing body of school districts can levy a fee, charge, dedication form, or other form of requirement against residential, commercial, and industrial development projects within the boundaries of the district for the purposes of funding the construction or reconstruction of school facilities. In May 2024, the PGUSD Board of Trustees passed and adopted developer fees of $5.17 per square foot of residential development; $0.84 per square foot of new commercial or industrial development; $0.77 per square foot of lodging/hotel development; and $0.04 per square foot of self-storage development (PGUSD 2024).

Figure 4.13-2 Schools Serving Pacific Grove



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Additional data provided by City of Pacific Grove, 2025.

23-14477 EPS
Fig 4.13-2 Schools

d. Public Libraries

The City owns and maintains its library system, which is comprised of the Pacific Grove Public Library located at 550 Central Avenue. The Pacific Grove Public Library is comprised of over 54,000 volumes including more than 19,000 books for children and young adults, and 3,000 large-type books in their collection (Pacific Grove Public Library 2023). The Pacific Grove Public Library also houses the Nancy & Steve Hauk Art Gallery, which showcases work of professional and emerging artists. The Pacific Grove Public Library was recently renovated in 2021, with improvements including additional circulation materials and new gathering and meeting spaces (Pacific Grove 2025b). The library is frequently used for after school programming, education and literacy programs for adults and youth, and community meetings. Library services include technology training classes, borrower services, and computer-related equipment, such as Wi-Fi hotspot lending, meeting rooms, community art gallery, passport appointments, and proctoring.

e. Parks and Recreation

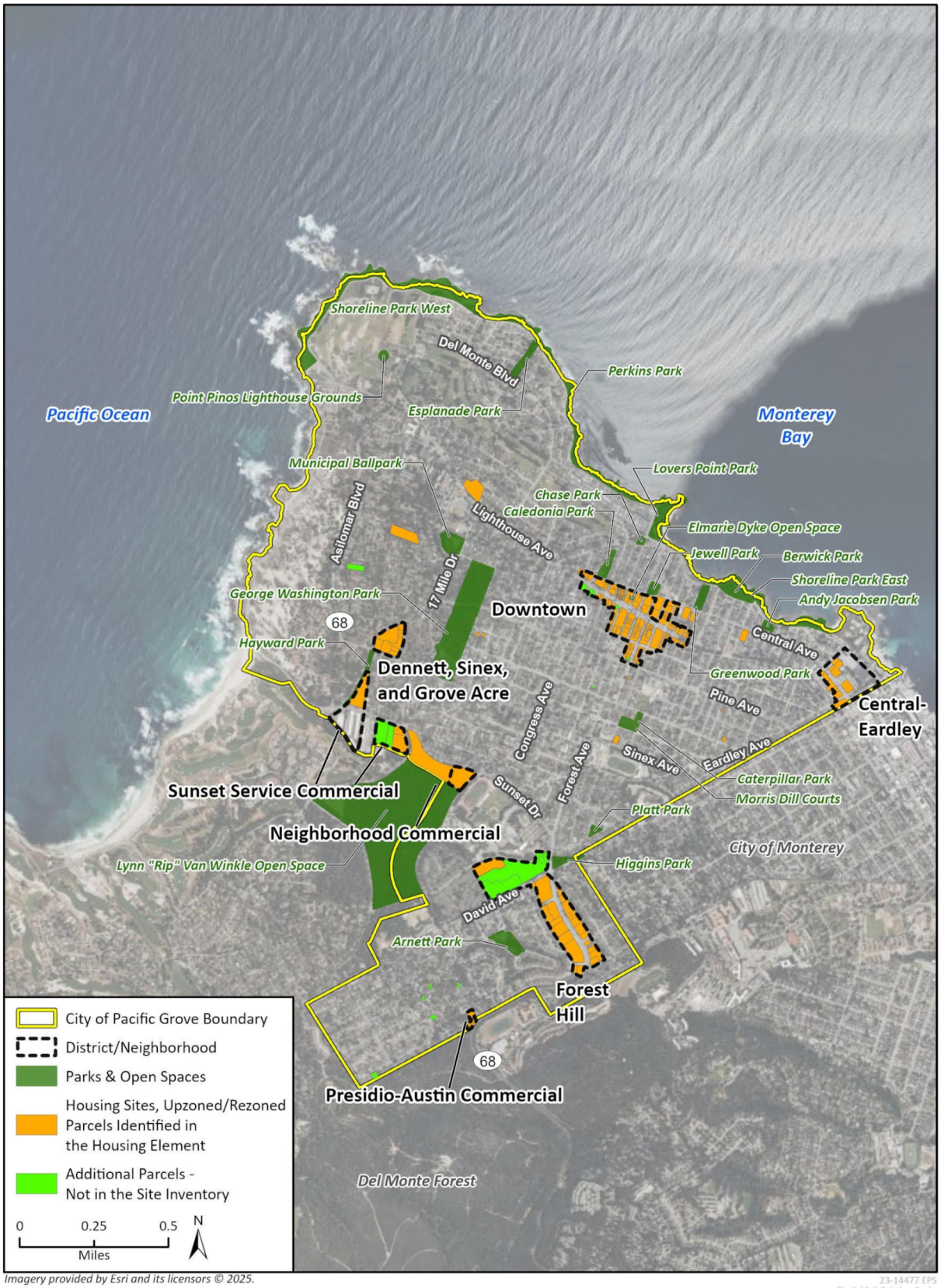
Park and recreational services in Pacific Grove are provided by the City Public Works Department and the Recreation Department, which operate a system of parks, recreation facilities, and open space areas (City of Pacific Grove 1994:1). The City Recreation Department administers City park and recreation programs, and the City Public Works Department maintains recreation facilities and City parks. The Recreation Department provides opportunities for active recreation (e.g., athletic fields and courts) and passive recreation (e.g., walking paths).

Table 4.13-3 and Figure 4.13-3 identify park facilities and types in Pacific Grove. The City of Pacific Grove currently includes a total of 28 formally-designated parks, open space, and recreation facilities in addition to public school facilities used for recreation, totaling approximately 449.2 acres. The types of parks in the area include neighborhood parks, community parks, regional and state parks, open spaces areas and visual open space. The General Plan categorizes these parks and open spaces as follows (City of Pacific Grove 1994: 1-2, 5-11):

- **Neighborhood Parks** serve residential recreation needs of people living or working within a half-mile of the park.
- **Community Parks** are larger than neighborhood parks and are intended to provide recreation opportunities beyond those supplied by the smaller neighborhood parks.
- **Regional Park and State Parks** often feature natural areas, museums, educational facilities, campgrounds, trails, usually serving the entire region. Regional and State Parks encompass approximately 112 acres of space. The Asilomar State Beach and Conference Grounds (103 acres) is part of the California State Park System.
- **Open Space Areas** refer to areas where most of the park is undeveloped and contains vegetation, topography, and features in their natural and undisturbed states.
- **Visual Open Space** refer to areas whose main purpose is to be visually apparent to the population but not generally utilized for recreational facilities; these facilities are listed by their public/private ownership.

Pacific Grove Municipal Code Section 24.48.030 establishes a goal of maintaining five acres of recreational parklands for each 1,000 persons residing in Pacific Grove.

Figure 4.13-3 Pacific Grove Parks, Recreation, and Open Space



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Additional data provided by City of Pacific Grove, 2025.

23-14477 EPS
Fig 4.13-3 Existing Parks

Table 4.13-3 Park Facilities in the Project Area

#	Facility	Acres[1]	Park Type
Shoreline Park Network			
1	Berwick Park	1.0	Neighborhood Park
2	Lovers Point Park	4.4	Community Park
3	Perkins Park	Included in Shoreline Park	Community Park
4	Shoreline Park	18.0	Community Park
	Subtotal	**23.4**	
Neighborhood Parks – Recreational			
5	Earl "Topper" Arnett Park	3.0	Neighborhood Park
6	Caledonia Park	1.7	Neighborhood Park
7	Jewell Park	0.6	Neighborhood Park
8	Platt Park	0.3	Neighborhood Park
	Subtotal	**5.6**	
Neighborhood Parks – Natural Areas and Open Space			
10	Andy Jacobson Park	0.6	Neighborhood Park
11	Chase Park	0.5	Neighborhood Park
12	Esplanade Park	1.2	Neighborhood Park
13	Greenwood Park	1.1	Neighborhood Park
14	Higgins Park	0.5	Neighborhood Park
	Subtotal	**3.9**	
Community Parks – Recreational			
16	Municipal Ball Park	2.9	Community Park
17	Pacific Grove Community Center/Morris Dill Tennis Courts	2.0	Community Parks
18	Pacific Grove Municipal Golf Course	90.0	Community Park
	Subtotal	**94.9**	
Community Parks – Natural Areas and Open Space			
20	George Washington Park	20.0	Community Park
21	Lynn "Rip" Van Winkle Open Space	20.0	Community Park
	Subtotal	**40.0**	
Regional and State Parks			
23	Asilomar State Beach	103.0	Regional and State Park
24	Rocky Shores	3.0	Regional and State Park
25	Monterey Peninsula Recreation Trail	6.0	Regional and State Park
	Subtotal	**112.0**	
Other Parks, Recreation Facilities, and Open Space Areas			
31	Monarch Grove Sanctuary	2.3	Open Space
32	Pacific Grove Rec Club	0.1	Recreational Facility
33	Chautauqua Hall	0.3	Recreational Facility
34	Elmarie Dyke Open Space	0.1	Open Space
35	Hayward Park	1.1	Neighborhood Park
36	Southern Pacific Railroad right-of-way	12.9	Open Space

#	Facility	Acres[1]	Park Type
37	Point Pinos Lighthouse Reservation	33.3	Open Space
	Subtotal	**49.9**	
Visual Open Spaces			
38	Elementary Schools (3)	30.2	Visual Open Space
39	Lighthouse Adult School	6.2	Visual Open Space
40	Pacific Grove Middle School & District Office	11.5	Visual Open Space
41	Pacific grove High School	38.0	Visual Open Space
42	El Carmelo Cemetery	12.3	Visual Open Space
43	California-American Water Reservoir	8.9	Visual Open Space
44	Stanford University's Hopkins Marine Station	12.5	Visual Open Space
	Subtotal	**119**	
	Total	**449.2**	

[1] Totals may not add due to rounding.

Source: City of Pacific Grove 1994

4.13.2 Regulatory Setting

a. Federal Regulations

Disaster Mitigation Act

Section 104 of the Disaster Mitigation Act of 2000 (Public Law 106-390) requires a state mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: Standard and Enhanced. States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also requires local communities to develop and maintain hazard mitigation plans as a condition for receiving certain types of federal disaster assistance. The County of Monterey Multi-Jurisdictional Hazard Mitigation Plan is discussed under c. *Regional and Local Regulations.*

National Fire Plan

The National Fire Plan was developed under Executive Order 11246 in August 2000, following a landmark wildland fire season. Its intent is to actively respond to severe wildland fires and their impacts to communities, while ensuring sufficient firefighting capacity for the future. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

b. State Regulations

Fire Protection

California Department of Forestry and Fire Protection Strategic Plan 2024

The California Department of Forestry and Fire Protection (CAL FIRE) Strategic Plan 2024 is the state's road map for reducing the risk of wildfire. The most recent version of the plan was finalized in January 2024 and directs each CAL FIRE Unit to address and meet incremental requirements to achieve six specific goals, including improving core capabilities, enhancing internal operations, ensuring health and safety, and building an engaged workforce (CAL FIRE 2024).

California Fire Code (Title 24, Part 9, California Code of Regulations)

The California Fire Code incorporates the Uniform Fire Code with necessary California amendments. This Code prescribes regulations consistent with nationally recognized good practices for the safeguarding, to a reasonable degree, of life and property from the hazards of fire explosion. It also addresses dangerous conditions arising from the storage, handling, and use of hazardous materials and devices; conditions hazardous to life or property in the use or occupancy of buildings or premises; and provisions to assist emergency response personnel.

California State Hazard Mitigation Plan

The purpose of the State of California Multi-Hazard Mitigation Plan (SHMP) is to significantly reduce deaths, injuries, and other losses attributed to natural and human-caused hazards in California. The SHMP provides guidance for hazard mitigation activities emphasizing partnerships among local, state, and federal agencies as well as the private sector. The California Office of Emergency Services prepares the SHMP, and in it identifies risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 for the state to receive federal funding.

California Health and Safety Code (Sections 13000 et seq.)

This code establishes state fire regulations, including regulations for building standards (also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Assembly Bill 747 (2019)

Assembly Bill (AB) 747 (2019) requires local hazard mitigation plans and safety elements of general plans to be reviewed and updated, as necessary, to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. AB 747 authorizes a city or county that has adopted a local hazard mitigation plan, emergency operations plan, or other document that fulfills commensurate goals and objectives to use that information in the safety element of the general plan to comply with this requirement by summarizing and incorporating by reference that other plan or document in the safety element.

Senate Bill 99 (2019)

Senate Bill (SB) 99 (2019) requires that, during the next housing element revision, safety elements of general plans be reviewed and updated to identify residential developments in any hazard area that do not have at least two evacuation routes.

Police Services

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.5 percent sales tax to be expended exclusively for local public safety services, including police services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Agencies are required to use Proposition 172 to supplement their local funds for police, as well as other public safety services. Section 35 at subdivision (a)(2) provides: “The protection of public safety is the first responsibility of

local government and local officials have an obligation to give priority to the provision of adequate public safety services."

Schools

California Code of Regulations (Title 5)

The California Code of Regulations, Title 5 Education Code, governs all aspects of education in the state, and allows school districts to prepare developer fees.

The School Facilities Act of 1986 (AB 2926) was enacted and added to California Government Code (CGC; Section 65995) in 1986. It authorizes school districts to collect development fees, based on demonstrated need, and to generate revenue for school districts for capital acquisitions and improvements. It also established maximum fees which may be collected under this and any other school fee authorization.

AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 *et seq.* to the CGC. Under this statute, payment of statutory fees by developers serves as exclusive mitigation under CEQA to satisfy the impact of development on school facilities.

School Facilities Bond Act: California Senate Bill 50

As part of the further refinement of the legislation enacted under AB 2926, the passage of the School Facilities Bond Act (Senate Bill [SB] 50) in 1998 defined the needs analysis process in CGC Sections 65995.5 through 65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity because of development. SB 50 generally provides for an equal state and local school facilities match and three levels of statutory impact fees. The application level depends on whether state funding is available; whether the school district is eligible for state funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

CGC Sections 65995 through 65998 implement AB 2926, as amended by SB 50. In accordance with Section 65995(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization…on the provision of adequate school facilities." PGUSD's developer fees are established by PGUSD Resolution No. 1122 which was adopted in May 2024.

Pursuant to CGC Section 65995(i), "a State or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in section 56021 or 56073 on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized pursuant to this section or pursuant to section 65995.5 or 65995.7, as applicable."

California Education Code Section 17620(a)(1) states the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

Parks and Recreation

Quimby Act

The Quimby Act (CGC Section 66477) was established by the California Legislature in 1965 to provide parks for growing communities in California. The Act authorizes cities to adopt ordinances addressing park land and/or fees for residential subdivisions for the purpose of providing and preserving open space and recreational facilities and improvements. The Act requires the provision of 3 acres of park area per 1,000 persons residing in a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case the county or city may adopt a higher standard not to exceed 5 acres per 1,000 residents. The Act also specifies acceptable uses and expenditures of such funds. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of parks.

c. Regional and Local Regulations

2022 Multi-Jurisdictional Hazard Mitigation Plan

Adopted in 2016, and last updated in 2022, the County of Monterey Multi-Jurisdictional Hazard Mitigation Plan includes hazard profiles, risk assessments, mitigation strategies, and Plan Implementation and Maintenance. The plan was prepared in coordination with FEMA, the California Office of Emergency Services, and participating jurisdictions, including the City of Pacific Grove. It focuses on 12 Monterey County cities, including Pacific Grove, as well as unincorporated Monterey County. The plan follows the planning guidance of the FEMA Community Rating System and addresses local mitigation planning requirements pursuant to the Disaster Mitigation Act of 2000. The plan includes Mitigation Goal 7, which requires jurisdictions to enhance their codes and enforcement where feasible, so that new construction can withstand the impacts of known hazards and to lessen the impact of development on the environment's ability to absorb the impact of natural hazards (County of Monterey 2022).

Community Wildfire Protection Plan

The purpose of the Community Wildfire Protection Plan is to help reduce the potential loss of human life and damage to property, and natural resources within three cities due to wildfire. The plan describes wildfire risk and potential throughout the counties, providing goals, policies, and discusses resources available (MFD 2023).

Pacific Grove Municipal Code

Section 18.04.010 of the Municipal Code adopts the California Building Code by reference with certain amendments. The City's Municipal Code provisions regarding fire protection are either identical to or more stringent than those found in the California Building Code. Specifically, Section 18.04.050 requires new buildings (excluding accessory structures and single-family dwellings) to have fire hydrants, fire mains, and sewer mains installed per Chapter 24.08, unless deemed unnecessary by the fire chief or City Engineer. Building permits cannot be issued until these requirements are met.

Chapter 24.48 of the Pacific Grove Municipal Code requires developers to pay development fees for the dedication of park and recreational facilities. Section 24.48.030 establishes a targeted parkland to population ratio of five acres of parkland per 1,000 residents.

Pacific Grove General Plan

The current Pacific Grove General Plan, adopted in 1994, includes policies that aim to reduce impacts to public services, schools, and open space. Policies applicable to the project include:

Health and Safety Element[1]

Goal 2. Provide aid to the community as needed in the event of natural or man-made disasters.

- **Policy 6.** Ensure that City emergency response procedures are adequate to deal with natural or man-made disasters in the community.
- **Policy 9.** Maintain a level of preparedness adequate to implement all parts of the Multi-Hazard Emergency Plan.

Goal 4. Prevent loss of life, injury, and property damage from fires, release of hazardous materials, natural disasters, and exposure to other hazardous conditions.

Goal 5. Ensure an adequate level of fire and medical emergency service to the community.

- **Policy 13.** Require new development to provide all necessary water service, fire hydrants, and roads consistent with Fire Department standards and City requirements which relate to the project.
- **Policy 14.** Require new development to comply with the minimum fire-flow rates contained in Appendix III-A in the most recent and locally-adopted edition of the Uniform Fire Code.
- **Policy 15.** Require all construction to meet the applicable current City codes for fire and life safety.
- **Policy 16**. Ensure adequate fire equipment access through the development review process.
- **Policy 17**. Ensure adequate water fire-flow throughout the city.
  - **Program G.** Identify emergency access routes.
- **Policy 20.** Endeavor to achieve and maintain an overall fire insurance (ISO) rating of 3 or better.
- **Policy 21.** Maintain an average response time of three minutes for Priority 1 (emergency) calls.
- **Policy 23**. Maintain and enhance the current level of emergency medical service to the community.

Goal 6. Prevent crime and promote the protection of people and property.

- **Policy 25.** Maintain an adequate level of police equipment and personnel consistent with city growth and development.
- **Policy 26**. Provide minimum response time for Priority 1 (emergency) calls.
  - **Program EE.** Work with 911 to shorten response time.
- **Policy 27**. Encourage the use of private patrols and security personnel in large residential and commercial developments to supplement police services.

[1] The project would include updating and revising the City's Health and Safety Element to include background information and maps to reflect existing conditions, identification of evacuation routes and capacity, and revised policies related to climate change, fire hazards, flooding, and emergency response. All proposed revisions to the Health and Safety Element are shown in Appendix C.

Public Facilities Element

Goal 6. Continue to provide the citizens of Pacific Grove with library services.

Goal 7. Promote efficiency and convenience in the siting of public facilities, while minimizing adverse effects on surrounding development.

- **Policy 26.** Ensure that new development pays appropriate development fees to offset any increased burden on public facilities and services
- **Policy 28.** Plan for facilities needed to meet the service requirements of the City.

Parks and Recreation Element

Goal 1. Maintain a public park system and recreation facilities suited to the needs of all Pacific Gove residents and visitors.

Goal 2. Designated adequate land for developing parks and recreation facilities.

Forest Hill Specific Plan

The Forest Hill Specific Plan is a long-range policy document that established goals and policies for land use, urban design, and recreation, circulation, and infrastructure for Forest Hill. The Plan also envisioned a community that is safe and accessible for pedestrians and bicyclists, has access to open space and recreational opportunities and fosters healthy living for all community members. This Plan established the framework for future development and improvements to achieve this vision, meet the needs of current and future residents, and maintain and improve the livability of Forest Hill. The Plan includes Policy 2.4, which aims to avoid development in the Forest Hill area that would result in unacceptable fire, flood, landslide, or other safety hazards (City of Pacific Grove 1998: 28).

4.13.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The emphasis of the public services and recreation analysis is on the existing conditions of fire, police, school, library, and other public services; the existing conditions of recreational facilities; and the potential impact of buildout facilitated by the project on these services and facilities. In addition to reviewing the existing conditions of public services and recreation facilities, public service providers were contacted for their input on current operations and how buildout facilitated by the project could affect services and facilities.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on public services and recreation if it would:

1. Result in substantial adverse physical impacts associated with the need for or provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives for:
   a. fire protection,

b. police protection,
c. schools,
d. parks,
e. other public facilities;

2. 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; and/or
3. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Additionally, for impacts to be considered significant, development of these public services would also have to result in a significant physical environmental impact not already analyzed and disclosed in the other resource chapters of this DEIR.

b. Project Impacts and Mitigation Measures

Threshold 1.a: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Impact PS-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED FIRE FACILITIES TO MAINTAIN ACCEPTABLE SERVICE RATIO RESPONSE TIMES OR OTHER OBJECTIVES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Chapter 2, *Project Description*, development facilitated by the project would result in up to 2,335 new housing units and up to 4,950 new residents, which would bring the total number of housing units in the city to 10,587 units and the city's population to 19,916 residents. As a result, MFD would need to increase their fire protection services to Pacific Grove through the year 2031, which could in turn require the construction of new facilities to accommodate subsequent personnel, equipment, and vehicles. The placement and potential impacts of new fire protection facilities are unknown at this time; if construction or expansion of future facilities are needed, separate environmental review would be required, which could result in development and implementation of future project-specific mitigation measures.

The housing sites, upzoning areas, and additional parcels are all within 1.5 miles of MFD Station 4. As future development occurs in Pacific Grove, the City and MFD will evaluate operations and deployment of services to efficiently use resources. Fire protection services are maintained and expanded through property taxes and collection of fees that grow incrementally as development occurs within a service area. Additionally, new development facilitated by the project would be required to comply with all applicable federal, state, and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants. This includes the 2022 California Fire Code, which contains project-specific requirements such as construction standards in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for sprinkler systems and minimum fire flow rates for water mains. Future development would also be reviewed for consistency with the goals and policies of the Health and Safety Element, which are listed above

under "Health and Safety Element" in Section 4.13.2, *Regulatory Setting.* In particular, when reviewing future development, the City would consider Policies 16 and 17, which aim to ensure adequate fire equipment access and water fire flows, and Policies 21 and 23, which aim to maintain and enhance the current response times and level of emergency service to the community.

Further, the project involves updates and revisions to the City's General Plan Health and Safety Element, to include background information and maps to reflect existing conditions, identification of evacuation routes and capacity, and revised policies related to climate change, fire hazards, flooding, and emergency response. Refer to Appendix C for all proposed revisions to the Health and Safety Element. As discussed in Section 4.8, *Hazards and Hazardous Materials,* and Section 4.17, *Wildfire,* updated and revised policies would enhance emergency response in Pacific Grove. As discussed therein, the City's Health and Safety Element would be revised in accordance with the requirements of AB 747 and SB 99, which have mandated the inclusion of additional assessments and measures associated with emergency evacuation, including identification of emergency evacuation routes and capacity. Identification of emergency access routes and their capacities under various emergency scenarios would facilitate emergency response plans in these scenarios, and would increase MFD's ability to respond.

Accordingly, with compliance with the California Fire Code and implementation of current and proposed Health and Safety Element goals and policies, impacts related to the provision of fire protection services would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 1.b: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Impact PS-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED POLICE FACILITIES TO MAINTAIN ACCEPTABLE SERVICE RATIO RESPONSE TIMES OR OTHER OBJECTIVES. IMPACTS WOULD BE LESS THAN LESS THAN SIGNIFICANT.

Development facilitated by the project would result in up to 2,335 new housing units and up to 4,950 new residents, which would bring the total number of housing units in the city to 10,587 units and the city's population to 19,916 residents. As a result, PGPD would need to increase their police protection services to Pacific Grove through the year 2031, which could in turn require the construction of new facilities to accommodate subsequent personnel, equipment, and vehicles. The placement and potential impacts of new police protection facilities are unknown at this time; if construction or expansion of future facilities are needed, separate environmental review would be required, which could result in development and implementation of future project-specific mitigation measures.

The housing sites, upzoning areas, and additional parcels are all within 1.5 miles of the PGPD station. Development facilitated by the project would increase the number of individuals in Pacific Grove, with associated increases in activity at those sites. This increase in activity level at the sites may deter some crime, as the presence of more people can deter criminal activity. As for police protection services, the increase in population generated by the project would contribute to greater

police service demands. As future development occurs in Pacific Grove, the City and PGPD will evaluate operations and deployment of services to efficiently use resources and maintain acceptable service ratios and response times. The existing ratio of police officers to residents is approximately 1.5 per 1,000 residents.[2] Development facilitated by the project would add approximately 4,950 new residents in Pacific Grove, resulting in a total population of 19,916 and a ratio of police officers to residents of approximately 1.1 per 1,000 residents.[3] Approximately seven additional officers may be required to maintain the service level currently serving the project area.[4] While PGPD may require additional staff to maintain existing service ratios and response times, seven additional officers would not warrant the construction of a new facility. Therefore, the project would not require provision of new or physically altered police protection facilities. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 1.c: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Impact PS-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would result in up to 2,335 new housing units and up to 4,950 new residents, which would bring the total number of housing units in the city to 10,587 units and the city's population to 19,916 residents. The increase in population would result in an increase in the number of students who would attend PGUSD schools. As of 2024, there are 8,252 housing units in Pacific Grove, and as discussed in Section 4.13.1, *Setting,* there are 1,727 students currently enrolled in PGUSD schools. This results in a ratio of approximately 0.2 students per housing unit in Pacific Grove.[5] Assuming future housing units facilitated by the project result in a similar ratio of students, the project would result in an increase of 489 students.[6]

Although PGUSD's enrollment has been declining in recent years, the addition of 489 students would exceed historic enrollment at PGUSD. As future development occurs, the City and PGUSD will evaluate school operations and services to maintain acceptable service ratios and remain within the capacity of PGUSD schools. Further, future residential, commercial, and industrial development in Pacific Grove would be required to pay state-mandated impact mitigation fees to provide funding for additional schools to serve the area, pursuant to SB 50. Pursuant to Section 65995(h) of the California Government Code, the payment of statutory fees "is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to,

[2] PGPD has 22 sworn officers and Pacific Grove's current (2024) population is 14,966. 22 officers divided by 14.966 thousand residents is approximately 1.5.
[3] 22 officers divided by 19.916 thousand residents is approximately 1.1.
[4] 22 officers, plus seven additional officers (29) divided by 19.916 thousand residents is approximately 1.5, the same officers to residents ratio as what currently exists.
[5] 1,727 students divided by 8,252 housing units is approximately 0.2 students per household.
[6] The project would result in a net increase of 2,335 housing units. An estimated average of 0.2 students per household multiplied by 2,335 households is approximately 489 students.

the planning, use, or development of real property, or any change in governmental organization or reorganization." The mandatory payment of impact mitigation fees would serve as full and complete mitigation for future development. As discussed in Section 4.13.2, *Regulatory Setting,* PGUSD's developer fees are established by PGUSD Resolution No. 1122.

Therefore, although students generated by the project may exceed historic enrollment at PGUSD, the payment of mitigation fees would fully mitigate the potential development of PGUSD schools and facilities. The project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered schools, the construction of which would cause significant environmental impacts. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 1.e: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Impact PS-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED LIBRARY OR OTHER PUBLIC FACILITIES TO MAINTAIN ACCEPTABLE SERVICE OBJECTIVES, AND THE PAYMENT OF PROPERTY TAXES FUNDING LIBRARY OR OTHER PUBLIC FACILITIES WOULD BE REQUIRED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would introduce approximately 4,950 new residents to Pacific Grove, which would be expected to proportionally increase library service utilization. While new library cardholders generated by the project would visit the library, check out items, and participate in library events, increased demand for library services would not necessarily compel the construction of a new or expanded library facility in the city. The Pacific Grove Public Library was recently renovated in 2021, with improvements including additional circulation materials and new gathering and meeting spaces (Pacific Grove 2025b). Development facilitated by the project would generate the payment of property taxes, which would in part fund necessary future improvements to the library.

Because adequate existing and planned facilities are available, development facilitated by the project would not require construction of new or expanded library facilities. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 1.d:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks?
Threshold 2:	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
Threshold 3:	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?

Impact PS-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED PARKS OR RECREATION FACILITIES TO MAINTAIN ACCEPTABLE SERVICE RATIOS AND WOULD NOT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.13.1, *Setting*, Pacific Grove contains approximately 449 acres of community parks, neighborhood parks, playfields, regional parks, open space, and recreational facilities. Based on the city's current (2024) population of 14,966 residents, these recreation facilities provide an existing park to population ratio of approximately 30 acres per 1,000 residents.[7] This ratio exceeds the City's parkland to population ratio goal of 5 acres per 1,000 residents.

Development facilitated by the project would introduce approximately 4,950 new residents to Pacific Grove, which would result in an incremental increase in demand for public parks and recreational facilities. The project would result in a future (2031) population of 19,916 residents, which would result in a park to population ratio of 22 acres per 1,000 residents.[8] This ratio would still exceed the City's standard of 5 acres per 1,000 residents. Therefore, the project is not anticipated to result in the need for new or physically altered parks or recreational facilities and would not result in substantial physical deterioration of existing parks.

Pursuant to Chapter 24.48 of the Pacific Grove Municipal Code, future project applicants would be required to pay park impact fees or dedicate parkland proportional to the size and type of development. Compliance with Pacific Grove Municipal Code Chapter 24.48 would ensure growth in the project area would continue to comply with Quimby Act requirements. Because of the existing high ratio of parkland to population, project implementation would not place demands on existing or future parks or recreational facilities such that substantial physical deterioration would occur. While existing and future parks would need periodic maintenance, the increased demand for parks and other recreational facilities would not outpace routine maintenance.

The project does not include specific development proposals for new or expanded parks or recreational facilities; however, future development proposals for new or expanded parks and/or recreational facilities would be subject to City review, potentially including environmental analysis pursuant to CEQA. Therefore, development facilitated by the project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered parks

[7] 449 acres of parkland divided by 14.966 thousand residents is approximately 30 acres of parkland per 1,000 residents.
[8] 449 acres of parkland divided by 19.916 thousand residents is approximately 22 acres of parkland per 1,000 residents.

or result in substantial adverse impacts due to the construction or expansion of recreational facilities. These impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.13.4 Cumulative Impacts

Fire Protection

The geographic scope for cumulative fire protection impacts is the service area of MFD. This geographic scope is appropriate because development facilitated by the project will increase the demand for MFD fire protection services. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would increase the demand for fire protection services, which may require new or expanded fire protection facilities.

For this analysis, a cumulative impact would occur if growth in the service area requires physical expansion of facilities such as construction of new fire facilities that would result in adverse physical impacts. Cumulative development would mostly involve construction of residential uses in previously developed areas or commercial areas, which would be within MFD's service area and would not substantially increase the number of people in their service area. In addition, fire protection services are maintained and expanded through property taxes and collection of fees that grow incrementally as development occurs within a service area. Therefore, cumulative impacts related to adverse physical impacts from new or physically altered fire protection services (Threshold 1.a) are anticipated to be less than significant.

Police Protection

The geographic scope for cumulative police protection impacts is the PGPD service area. This geographic scope is appropriate because development facilitated by the project will increase the demand for police protection services from the PGPD. Cumulative buildout in PGPD's service area, including projects listed in Table 3-1 and shown on Figure 3-1, would increase the demand for police protection services, which may require new or expanded police protection facilities.

Cumulative impacts would occur if growth within the service area requires the construction of a new or the expansion of an existing police station that would result in significant adverse physical impacts. Cumulative development in Pacific Grove would involve the construction of new commercial and residential uses in already developed sites, which are currently served by PGPD. Therefore, cumulative development would not substantially increase the number of people or structures in the PGPD service area. In addition, police protection services are maintained and expanded through property taxes and collection of fees that grow incrementally as development occurs within a service area. Therefore, cumulative impacts related to adverse physical impacts from new or physically altered police services (Threshold 1.b) are anticipated to be less than significant.

Schools

The geographic scope for cumulative school impacts is the PGUSD boundary, which includes the city of Pacific Grove and the census-designated place of Pebble Beach. This geographic scope is appropriate because development facilitated by the project would increase the demand on PGUSD services and facilities. Cumulative buildout in the PGUSD boundary would increase the number of students in PGUSD's service area, which could require new or expanded schools.

Cumulative impacts would occur if growth within the PGUSD would result in significant adverse physical impacts with the provisions for, or the need for, new or physically altered school facilities. Cumulative projects would increase enrollment in the districts; however, PGUSD is currently experiencing a decline in student enrollment, which would at least partially offset potential future increases in enrollment. In addition, future development would be required to pay PGUSD developer fees, which would serve as full and complete mitigation for future development. Accordingly, cumulative impacts to schools (Threshold 1.c) would be less than significant.

Libraries

The geographical scope for cumulative library impacts is Pacific Grove city limits. This geographic scope is appropriate because development facilitated by the project would increase the demand on library services, which are available to Pacific Grove residents. Cumulative buildout in this region would increase the demand for library services, which may require new or expanded library facilities.

Cumulative impacts could occur if growth within the system requires the construction of new or the expansion of an existing library that would result in adverse physical impacts. Cumulative population growth, including the proposed project, would increase the demand for library services. However, new residents to the city facilitated by cumulative development would be expected to utilize existing library facilities, such that an expansion or construction of a new library would not be required to meet increased demand. Because new or expanded facilities would not be required, cumulative impacts would be less than significant (Threshold 1.d).

Parks and Recreation

The geographic scope for cumulative parks, recreation, and other public facility impacts is the greater Monterey Peninsula area. This geographic scope is appropriate because new residents in the project area would use parks and recreational facilities throughout the Monterey Peninsula in addition to those within Pacific Grove. In addition, tourists visiting the region would also be expected to visit parks and coastal access areas within Pacific Grove.

Cumulative impacts to parks and recreational facilities would occur if cumulative development, and related population growth, increases the use of existing facilities such that substantial physical deterioration of those facilities would occur, or if new facilities would need to be constructed or existing facilities expanded that would have an adverse effect on the environment. Cumulative development would result in an increase in the use of existing recreational facilities; however, the city currently exceeds its goal of providing five acres of parkland per 1,000 residents, providing approximately 30 acres of parkland per 1,000 residents. The City could experience a population increase of 75,000 new residents (a 500 percent increase over current population) and still provide the target ratio of five acres of parkland per 1,000 residents.[9] Anticipated cumulative growth is far below this hypothetical increase; therefore, even if cumulative development far exceeds growth projections, the City would be able to maintain service ratios for parks. In addition, funding through impact fees paid by individual cumulative development projects would support the maintenance of park facilities. Therefore, cumulative impacts related to new or expanded park and recreation facilities (Thresholds 1.d, 2, and 3) would be less than significant.

[9] 449 acres of parkland divided by a hypothetical population of 89,966 residents would result in a ratio of 5 acres of parkland per 1,000 people.

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4.14 Transportation

This section summarizes Pacific Grove's existing local and regional circulation system and evaluates the potential environmental effects of the proposed project related to transportation and circulation. This section specifically includes an analysis of the proposed project's consistency with applicable local, regional, and state land use plans, policies, and regulations and discusses the potential for implementation of the proposed project to increase local and regional vehicle miles traveled (VMT), as well as the project's potential to increase transportation hazards or interfere with emergency access. Analysis in this section is based on the *Transportation Studies to Support CEQA Analysis Memorandum* (Transportation Memorandum) prepared for the proposed project in March 2025 (Appendix E).

4.14.1 Setting

a. Existing Transportation System

The existing transportation system is comprised of highways, arterial roadways, collector streets, and bicycle and pedestrian facilities. The existing transportation system is discussed below.

Regional Access

Regional access to Pacific Grove is provided by State Route (SR) 1 which travels north-south along the coast of Monterey County, and SR-68, which travels between Salinas and the Monterey Peninsula. These roadways are detailed below.

State Route 1

SR-1 is a major north-south state highway that runs along the coastline of California. SR-1 runs from Orange County in the south to Mendocino County to the north. SR-1 is the primary regional route between Pacific Grove and surrounding coastal towns. Access to SR-1 from Pacific Grove is provided via SR-68 to the SR-1/SR-68 interchange approximately 1.9 mile south of the Pacific Grove city limits.

State Route 68

SR-68 is an east-west state highway that runs between Asilomar State Beach in Pacific Grove and United States Route 101 in Salinas. SR-68 provides Pacific Grove with connection to SR-1, inland communities, and access to United States Route 101 for more substantial regional or state travel. Access to SR-68 in Pacific Grove is provided via local roadways that connect to Sunset Drive and Forest Avenue, both of which function as local extensions of SR-68.

Local Access

Local access to housing sites is provided by arterial roadways and collector streets. Arterial roadways carry through traffic and connect to the state highway system and are designed to have the highest traffic carrying capacity in the local roadway system. Collector streets serve as intermediate routes to handle traffic between local streets and streets of higher classification, such as arterial roadways. Descriptions of local streets providing local access to the housing sites are provided below.

Lighthouse Avenue

Lighthouse Avenue is a two-lane roadway that extends northwest to southeast across Pacific Grove from Eardley Avenue to the Point Pinos Lighthouse. Lighthouse Avenue provides a connection to the housing sites, upzoning areas, and additional parcels within and near the Downtown District.

Central Avenue

Central Avenue is a two-lane roadway that extends southeast to northwest from Eardley Avenue to Grove Street. Central Avenue provides a connection to the housing sites, upzoning areas, and additional parcels within and near the Central-Eardley Commercial District.

Forest Avenue

Forest Avenue is a two to four lane roadway that extends from the southern portion of the Pacific Grove city limits northeast to Ocean View Boulevard. The southern portion of Forest Avenue serves as a local continuation of SR-68 between the southern Pacific Grove city limits and Sunset Drive. Forest Avenue provides a connection to the housing sites, upzoning areas, and additional parcels within the Forest Hill Commercial District.

Sunset Drive

Sunset Drive is a two-lane roadway that extends northwest from Forest Avenue to its connection with Ocean View Boulevard near the Asilomar Coastal Trail. Sunset Drive serves as a continuation of SR-68 northwest of its junction with Forest Avenue. Sunset Drive provides a connection to the housing sites, upzoning areas, and additional parcels within the Sunset Service Commercial District.

Dennett Street

Dennett Street is a two-lane roadway providing residential access between 17 Mile Drive and Sinex Avenue. Dennett Street provides a connection to the housing sites, upzoning areas, and additional parcels within the Dennet, Sinex, and Grove Acre Neighborhood.

Sinex Avenue

Sinex Avenue is a two-lane roadway that extends southeast to northwest from Eardley Avenue to Asilomar Avenue. Sinex Avenue provides a connection to the housing sites, upzoning areas, and additional parcels within the Dennett, Sinex, and Grove Acre Neighborhood.

Bicycle and Pedestrian Facilities

Bicycle facilities consist of Class I, II, and III bikeways. Class I shared-use paths or bike paths are facilities with right-of-way separated from roadways. Class II bike lanes provide a striped lane for one-way bicycle travel on the side of the street adjacent to vehicle traffic. Class III bike routes consist of a roadway that is shared between bicycle and vehicle traffic with supplemental bike signage. A Class I bike path in Pacific Grove is the Monterey Bay Coastal Recreation Trail, which extends from the Monterey Bay Aquarium to Lovers Point. Ocean View Boulevard extending from Eardley Avenue to Asilomar Avenue is a Class III bikeway. Ocean View Boulevard/Sunset Drive between Asilomar Avenue and 17 Mile Drive is striped with Class II bike lanes (City of Pacific Grove 2015: 3-12).

Pedestrian facilities include sidewalks, crosswalks, multi-use paths, and pedestrian signals at signalized intersections. Pedestrian facilities near housing sites, upzoning areas, and additional parcels include sidewalks adjacent to roadways.

Transit Facilities

Transit routes and facilities in Pacific Grove are provided by Monterey-Salinas Transit. Specifically, Monterey-Salinas Transit Route 1, the Asilomar – Lovers Point line, and Route 2, the Pacific Grove Line, serve Pacific Grove. Collectively, these transit routes provide public transportation to points of interest in Pacific Grove, including the Monterey Bay Aquarium, Fisherman's Wharf, Lighthouse Avenue, County Club Gate Shopping Center, and the Sally J. Griffin Senior Center (City of Pacific Grove 2025).

4.14.2 Regulatory Setting

a. Federal Regulations

United States Department of Transportation

The United States Department of Transportation provides a number of grant programs, primarily for the construction and upgrading of major highways and transit facilities. Many of these grants are administered by the state and regional governments. Use of federal grant funding also invokes the National Environmental Protection Act in some cases.

b. State Regulations

Caltrans Authority over the State Highway System

The California Department of Transportation (Caltrans) is responsible for the planning, design, construction and maintenance of all interstate freeways and state routes. It builds, maintains, and operates the State Highway System in California with a goal to facilitate the safe and efficient use of the state transportation system for all users. Caltrans set standards in its 2020 Transportation Impact Study Guide that focus on the VMT metric. This document is often used by local governments to uniformly review transportation analysis and assess the operational standards of Caltrans-maintained facilities. The document is intended to be a reference and informational document that aligns with the standards and thresholds established in the Office of Land Use and Climate Innovation (LCI; formerly the Office of Planning and Research) *Technical Advisory on Evaluating Transportation Impacts in CEQA.* The 2020 document acts as a replacement for the 2002 *Guide for the Preparation of Traffic Impact Studies* but is only intended to be used with local land use projects and plans, not to be used for transportation projects on the State Highway System.

Caltrans District 5 Active Transportation Plan

The District 5 Active Transportation Plan is part of a comprehensive planning process to identify locations with walking and bicycling needs in each Caltrans district across California. The plan includes a prioritized list of bicycle and pedestrian needs along and across the state highway system to help identify opportunities to incorporate bicycle, pedestrian, and transit improvements into projects.

Complete Streets Act

The Complete Streets Act was signed into law as Assembly Bill (AB) 1358 in 2008. It requires that cities and other public agencies incorporate "complete street" policies and principles into their General Plans and Updates within the Circulation Elements, so that the plan addresses the needs of all users, including bicyclists and pedestrians. Caltrans Deputy Directive 64 (DD-64-R1 October 2008) embraces the Complete Streets Act and its incorporation into all phases of state highway projects, from planning to construction to maintenance and repair.

Senate Bill 743

Senate Bill (SB) 743, which was signed into law in 2013, tasked the LCI with establishing new criteria for determining the significance of transportation impacts under CEQA. SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states that alternative measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." To implement SB 743, the California Natural Resources Agency updated the *CEQA Guidelines* to include Section 15064.3, which changed the metric for analyzing transportation impacts from level of service (LOS), a measure of traffic congestion, to VMT, a measure of the frequency and distance that people drive. SB 743 and the subsequent changes to the *CEQA Guidelines* altered the way that public agencies evaluate the transportation impacts of projects under CEQA by recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (California Public Resource Code, Section 21099, subd. [b][2]). In addition to new exemptions for projects that are consistent with specific plans, the updated *CEQA Guidelines* replace congestion-based metrics, such as auto delay and level of service, with VMT as the basis for determining significant impacts, unless the guidelines provide specific exceptions.

Senate Bill 99

SB 99 mandates the inclusion of emergency evacuation routes in the safety elements of general plans to enhance community safety. SB 99 requires cities and counties to identify residential developments in hazard areas that lack at least two emergency evacuation routes and update their safety elements accordingly. The bill aims to ensure that residents in hazard-prone areas have adequate evacuation options during emergencies, such as wildfires or floods, thereby improving public safety and preparedness. This update must occur upon the next revision of the housing element on or after January 1, 2020. As discussed in Section 2.6.4 of Chapter 2, *Project Description,* a component of the proposed project is to update the City's Housing Element and Health and Safety Element to comply with the requirements of SB 99.

Assembly Bill 747

AB 747 requires the safety elements of general plans to be reviewed and updated to identify evacuation routes and their capacity, safety, and viability under various emergency scenarios. This update must occur upon the next revision of a local hazard mitigation plan on or after January 1, 2022, or by January 1, 2022, if a local jurisdiction has not yet adopted such a plan. The bill allows cities and counties that have adopted a local hazard mitigation plan, emergency operations plan, or similar document to use that information in the safety element by summarizing and incorporating it by reference. As discussed in Section 2.6.4 of Chapter 2, *Project Description,* a component of the proposed project is to update the City's Housing Element and Health and Safety Element to comply with the requirements of AB 747.

c. Regional and Local Regulations

Association of Monterey Bay Area Governments Metropolitan Transportation Plan/Sustainable Communities Strategy

The Association of Monterey Bay Area Governments (AMBAG) is required by state and federal law to prepare, update, and adopt a Regional Transportation Plan every four years. As part of the Regional Transportation Plan update, a Sustainable Communities Strategy (SCS) is required to be prepared. The most recent iteration of this plan, the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), addresses all modes of travel and identifies and prioritizes expenditures from anticipated funding for all modes of transportation including highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as transportation demand management strategies. All transportation projects that use state and federal funds, or that could significantly affect transportation within Monterey County, must be included in the 2045 MTP/SCS. The 2045 MTP/SCS includes the following goals:

- **Access and Mobility** – Provide convenient, accessible, and reliable travel options while maximizing productivity for all people and goods in the region.
- **Economic Vitality** – Raise the region's standard of living by enhancing the performance of the transportation system.
- **Environment** – Promote environmental sustainability and protect the natural environment.
- **Healthy Communities** – Protect the health of our residents; foster efficient development patterns that optimize travel, housing, and employment choices and encourage active transportation.
- **Social Equity** – Provide an equitable level of transportation services to all segments of the population.
- **System Preservation and Safety** – Preserve and ensure a sustainable and safe regional transportation system.

Transportation Agency for Monterey County 2022 Regional Transportation Plan

The Transportation Agency for Monterey County adopted a 2022 Regional Transportation Plan, which contains a policy element that provides a framework for selecting, prioritizing, and evaluating transportation projects to meet Monterey County's mobility needs. The policy element is derived from the Smart Mobility Framework developed by Caltrans and is compiled into AMBAG's 2045 MTP/SCS to achieve a coordinated and balanced regional transportation system for the Monterey Bay Region. Goals and policies intend to increase affordability, reduce gaps in active transportation infrastructure, and reduce air pollutant emissions. Applicable policies from the 2022 Regional Transportation Plan include:

- **Policy 1.1.** Increase affordability, accessibility and safety between key origins and destinations in the region.
- **Policy 1.2.** Deliver projects that improve travel time for all modes of transportation including pedestrians, bicyclists, transit, car/vanpool, and freight.
- **Policy 1.4.** Reduce transportation congestion through increasing accessibility of viable transportation alternatives for regional travel and commute patterns.

- **Policy 2.3.** Increase mode share of active transportation alternatives for commute to work trends.
- **Policy 2.4.** Decrease quantities of harmful air pollutants resulting from transportation.

Transportation Agency for Monterey County 2018 Active Transportation Plan for Monterey County

The 2018 Active Transportation Plan for Monterey County is an update of the 2011 Bicycle and Pedestrian Master Plan. The plan identifies gaps in existing bicycle and pedestrian networks and opportunity areas for innovative bicycle facility design. The plan designates recommended projects involving the installation of bike lanes, bike routes, and sidewalks in Pacific Grove to improve active transportation.

City of Pacific Grove General Plan

The City's General Plan Transportation Element identifies the general location and extent of existing and proposed major transportation facilities for vehicle, rail, air, water, and bicycle transportation. In addition, the Transportation Element includes goals and policies related to maintaining complete streets, VMT reduction, encouraging active transportation, and coordination with AMBAG.

City of Pacific Grove Forest Hill Specific Plan

The Forest Hill Specific Plan supplements the City's General Plan and provides additional policy direction for the development of the Forest Hill Specific Plan area. The Forest Hill Specific Plan envisions specific new pedestrian facilities, parking, and improvement projects in addition to the goals and policies outlined in the City's General Plan.

City of Pacific Grove Local Coastal Program

The City's 2020 Local Coastal Program (LCP) contains a series of policies specifically tailored to transportation within the Coastal Zone. Specifically, Policy INF-14 encourages "complete streets" for all modes of transportation; Policy INF-16 requires construction phase traffic control plans for new development where warranted; INF-17 seeks to increase transit service; and INF-19 requires provision of bicycle racks.

Pacific Grove Municipal Code

The Pacific Grove Municipal Code sets forth standards to minimize potential circulation-related hazards and inadequate emergency services. Section 15.01.150 of the Pacific Grove Municipal Code requires the installation and use of safety measures, such as lights and warning signs, for construction that would encroach within a public right-of-way. Section 24.32.110 of the Pacific Grove Municipal Code sets forth standards for minimum widths and turning radii for roadways. Chapter 16.70 of the Pacific Grove Municipal Code requires residential developers to implement proposed design elements and facilities that encourage alternative transportation for developments with 25 or more units, including providing bicycle and pedestrian facilities.

4.14.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

This analysis is based on the results of the *Transportation Studies to Support CEQA Analysis Memorandum* prepared for the proposed project in March 2025 (Appendix E). The methodologies used within that analysis are summarized below; for a full description refer to Appendix E.

Vehicle Miles Traveled Analysis

Potential impacts related to VMT were assessed using the AMBAG Regional Travel Demand Model, which serves as the region's tool for calculating VMT. The land use patterns that were evaluated using the Regional Travel Demand Model include the following scenarios:

- **Baseline** – 2023 land use in the incorporated and unincorporated areas of Monterey County.
- **2031 No Project** –2031 land uses in the incorporated and unincorporated areas without implementation of the proposed project. The 2031 No Project scenario includes projected land use changes from 2023-2031 for other cities and unincorporated areas within the AMBAG jurisdiction, excluding Pacific Grove.
- **2031 With Project** – 2031 land uses in the incorporated and unincorporated areas with implementation of the proposed project. The 2031 With Project scenario includes projected land use changes from 2023-2031 for other cities and unincorporated areas within the AMBAG jurisdiction, including Pacific Grove and land use changes and development facilitated by the proposed project.

The Regional Travel Demand Model has a base year of 2015 and a future year of 2045. However, the baseline year for the proposed project is 2023 and the horizon year is 2031. Additionally, the Regional Travel Demand Model is calibrated to a tri-County area. To address the discrepancy in the baseline year and the horizon year, and to conduct a more locally-specific VMT analysis, Replica, a platform that aggregates transportation data, was used to calculate the baseline VMT per capita and VMT per employee. The growth over time was obtained using the Regional Travel Demand Model by calculating the percent difference in VMT for each land use and applying that percentage as growth to the Replica baseline VMT.

Transportation Hazards and Emergency Access

The evaluation of the project's potential to increase transportation hazards or result in inadequate emergency access is based on a review of existing local requirements to determine if local regulations minimize the potential for transportation hazards and inadequate emergency access.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines,* the proposed project would have a significant impact on transportation if it would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);

3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment); and/or
4. Result in inadequate emergency access.

In regard to Threshold 2, the project would conflict or be inconsistent with *CEQA Guidelines* Section 15064.3, subdivision (b) if VMT generated by the project exceeds an applicable threshold of significance. The City has not officially adopted VMT thresholds. Instead, the City utilizes the VMT guidance established by LCI in the *Technical Advisory on Evaluating Transportation Impacts in CEQA.* Consistent with this approach, the VMT calculations are compared to the following thresholds of significance:

- **Residential Land Uses** – 15 percent below baseline average VMT per capita
- **Employment-Based Land Uses (i.e., office, service, professional services)** – 15 percent below baseline average VMT per employee

As determined in the Transportation Memorandum (Appendix E), the baseline (2023) residential VMT per capita is 16.8 and the baseline employment-based VMT per employee is 22.3. Consistent with LCI's VMT guidance, an appropriate threshold of significance would be 15 percent below baseline average VMT per resident and per employee. Fifteen percent below 16.8 VMT per resident is 14.3 and fifteen percent below 22.3 VMT per employee is 18.9. Therefore, the project would result in a significant impact if VMT generated by the project exceeds 14.3 VMT per resident or VMT 18.9 per employee.

Pursuant to *CEQA Guidelines* Section 15125, an EIR must include a description of the physical environmental conditions in the vicinity of a project. These conditions normally constitute the baseline physical conditions by which a lead agency determines whether an environmental impact is significant. Generally, baseline physical conditions are those that exist at the time the notice of preparation is published, which for this DEIR would be January 2024. However, the lead agency may also use baselines consisting of both existing conditions and projected future conditions to provide an accurate picture of the project's impacts. For the purpose of the VMT analysis, VMT potentially generated by the project is compared to the most recent available data for annual VMT per capita and per employee (2023) and compared to future VMT per capita and per employee that is projected to occur without implementation of the project. Comparing projected VMT increases to existing VMT would be misleading and inaccurate, as whether or not the project is implemented, VMT will increase in Pacific Grove as population growth and development occur. In other words, baseline VMT will increase in the future with or without the project, and it would be misleading to compare future VMT with a past baseline level of existing VMT as this would inaccurately attribute all VMT increases to the proposed project. Therefore, to accurately evaluate the project's impacts, this analysis compares project VMT to both existing (2023) and projected future baseline (2031 no project) conditions.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH APPLICABLE PROGRAMS, PLANS, ORDINANCES, AND POLICIES ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The proposed project would facilitate residential and non-residential growth, which would increase multi-modal trips (vehicle, bicycle, pedestrian, and transit) onto Pacific Grove's circulation network. This increase in multiple travel modes would occur in conformance with the goals and policies contained in the following plans affecting the city's circulation network. A brief discussion of the project's consistency with these plans is included below.

Consistency with Applicable Plans and Policies

Caltrans District 5 Active Transportation Plan

As described in Section 4.14.2, *Regulatory Setting*, the District 5 Active Transportation Plan identifies bicycle and pedestrian needs along and across the state highway system to identify opportunities to incorporate bicycle, pedestrian, and transit improvements into projects. All of the housing sites, upzoning areas, and additional parcels would be located within 0.5-mile of bicycle facilities and therefore would promote bicycle travel. The proposed project does not preclude the implementation of the District 5 Active Transportation Plan and would not impede active transportation projects on SR-68. Therefore, the proposed project would not conflict with the District 5 Active Transportation Plan.

Association of Monterey Bay Area Governments 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy

As described in Section 4.14.2, *Regulatory Setting*, the 2045 MTP/SCS includes goals to expand access to travel options, enhance the transportation system, and encourage active transportation. The housing sites, upzoning areas, and additional parcels identified by the proposed project are all within 0.5-mile of existing transit facilities and bicycle facilities, encouraging alternative transportation and providing access to multiple transportation options. The proposed project would not impede the implementation of any projects identified in the 2045 MTP/SCS designed to enhance the existing transportation system. As described further in Impact TRA-2, the proposed project would have a less than significant impact related to VMT, which would contribute to the VMT-reducing policies within the 2045 MTP/SCS. Therefore, the proposed project would not conflict with the 2045 MTP/SCS.

Transportation Agency for Monterey County 2022 Regional Transportation Plan

As described in Section 4.14.2, *Regulatory Setting*, the 2022 Regional Transportation Plan is compiled into AMBAG's 2045 MTP/SCS to achieve a coordinated and balanced regional transportation system for the Monterey Bay Region. As described above, the proposed project would be consistent with the 2045 MTP/SCS and therefore would also be consistent with the 2022 Regional Transportation Plan. As described in Section 4.2, *Air Quality*, the proposed project would have a less than significant impact related to criteria air pollutant releases and therefore would be

consistent with Policy 2.4 of the 2022 Regional Transportation Plan related to decreasing quantities of harmful air pollutants. In addition, the housing sites identified by the proposed project are all within 0.5-mile of existing transit facilities and bicycle facilities, which would help locate future residents near existing alternative transportation facilities. Accordingly, the project would be consistent with 2022 Regional Transportation Plan policies 1.1, 1.2, and 1.4, which intend to increase accessibility and reduce transportation congestion by making alternative transportation modes viable. Therefore, the proposed project would not conflict with the 2022 Regional Transportation Plan.

Transportation Agency for Monterey County 2018 Active Transportation Plan for Monterey County

The proposed housing sites, upzoning areas, and additional parcels are all located within 0.5-mile of existing bicycle facilities and are surrounded by sidewalks and would provide residents with access to bicycle and pedestrian networks. The proposed project does not identify housing sites or otherwise include components which would preclude implementation of active transportation projects identified within the 2018 Active Transportation Plan for Monterey County. Therefore, the proposed project would not conflict with the 2018 Active Transportation Plan for Monterey County.

City of Pacific Grove Local Coastal Program

The proposed housing sites, upzoning areas, and additional parcels are located in proximity to existing transit, bicycle, and pedestrian facilities, consistent with Policy INF-14 of the LCP encouraging complete streets and Policy INF-17 related to transit service. As described further in Impact TRA-3 and Impact TRA-4 below, development facilitated by the project in the Coastal Zone would comply with Policy INF-16 of the LCP to implement traffic control plans where warranted. Development facilitated by the proposed project would provide bicycle racks consistent with Chapter 16.70 of the Pacific Grove Municipal Code and Policy INF-19 of the LCP. Accordingly, the proposed project would not conflict with the City's LCP.

City of Pacific Grove General Plan

The City's General Plan Transportation Element includes goals and policies related to maintaining complete streets, VMT reduction, encouraging active transportation, and coordination with AMBAG. Table 4.14-1 evaluates the proposed project's potential to conflict with the Transportation Element. As shown therein, the proposed project is consistent with the goals and policies of the General Plan Transportation Element.

Table 4.14-1 Proposed Project Consistency with the General Plan Transportation Element

Goal or Policy	Consistency Analysis
Goal 1: Create and maintain a road network that will provide for the safe and efficient movement of people and goods throughout the city consistent with the goals of the City and the protection of the environment.	**Consistent.** Development facilitated by the project would be located within 0.5 mile of existing transit and bicycle facilities, which would help locate future residents near existing alternative transportation facilities. Therefore, the project would foster efficient movement of people throughout the city and would facilitate protection of the environment by reducing per capita emissions associated with personal vehicle use. Therefore, the project is consistent with this goal.
Goal 2: Protect residential areas from high-volume, high-speed traffic and its impacts.	**Consistent.** Although the project would increase the number of residents and consequently the number of vehicles in Pacific Grove, the project would not specifically facilitate the development of new roads or roads with increased speeds. In addition, as described in Impact TRA-2, the project would result in a lower VMT per resident and per employee. While the project would result in an increase to overall VMT in Pacific Grove, future residents would be located near alternative transportation facilities, which would alleviate high-volume traffic. Therefore, the project is consistent with this goal.
Policy 1: Adopt standards for street design and access that provide safe and efficient movement of goods and people consistent with environmental capacity.	**Consistent.** The project would not alter existing street design and access in Pacific Grove. In addition, as discussed in Impact TRA-3 and TRA-4, the project would not result in transportation design hazards or inadequate emergency access. Therefore, the project is consistent with this policy.
Goal 4: Limit the increase in auto use through Transportation System Management (TSM). Increase transit ridership, carpooling, vanpooling, walking, and bicycling.	**Consistent.** Development facilitated by the project would be located within 0.5 mile of existing transit and bicycle facilities, which would help locate future residents near existing alternative transportation facilities and encourage transit use. In addition, some development facilitated by the project would be located in or proximate to commercial centers, which would facilitate walking and bicycling to destinations in Pacific Grove. Therefore, the project would be consistent with this goal.
Policy 7: Limit the increase in Vehicle Miles Traveled (VMT) in accordance with Air Quality Management Plan goals.	**Consistent.** As described in Impact TRA-2, the project would not increase VMT per capita or per employee. Further, as discussed in Section 4.2, *Air Quality,* the rate of increase in VMT would not exceed the rate of population growth under the proposed project. Although the project would result in a population increase and an overall increase in total VMT in Pacific Grove, the rate at which this occurs would be less than the rate of population growth, which is consistent with the goals of the Air Quality Management Plan. Therefore, the project would be consistent with this policy.
Policy 10: Encourage design for new and expanded development that facilities access by transit, walking, bicycles, and carpools. **Goal 7:** Promote pedestrian and bicycle travel as alternative to automobile use.	**Consistent.** Development facilitated by the project would be located within 0.5 mile of existing transit and bicycle facilities, which would help locate future residents near existing alternative transportation facilities and encourage transit use. In addition, some development facilitated by the project would be located in or proximate to commercial centers, which would facilitate walking and bicycling to destinations in Pacific Grove. Therefore, the project would be consistent with this policy and goal.
Goal 3: Promote attainment, and insofar as possible, improve air quality in Pacific Grove and the Monterey Bay area.	**Consistent.** As described in Section 4.2, *Air Quality,* the project would be consistent with the Monterey Bay Air Resources District Air Quality Management Plan and would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. Therefore, the project is consistent with this goal.

Forest Hill Specific Plan

As discussed above in Section 4.14.2, *Regulatory Setting,* the Forest Hill Specific Plan envisions specific pedestrian, transit, vehicular circulation, and parking improvements in the Forest Hill Commercial District. The project would not facilitate development of any specific pedestrian, transit, roadway, or parking improvements; however, the project would facilitate residential and commercial development in the Forest Hill Commercial District. Development facilitated by the proposed project would be required to be designed in accordance with the design standards set forth in the Forest Hill Specific Plan. By conforming with these standards, development facilitated by the project within the Forest Hill Specific Plan area would assist in improving upon the benefits of expanded pedestrian facilities identified in the Forest Hill Specific Plan. Accordingly, the project would not conflict with the Forest Hill Specific Plan.

Conclusion

The plan consistency analysis above demonstrates that the proposed project complies with programs, plans, ordinances, and policies addressing the circulation system. This compliance would ensure that the proposed project would promote local and regional transportation goals and would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact TRA-2 THE PROJECT WOULD NOT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would result in short-term, temporary vehicle trips to and from development sites during construction of individual development projects. According to *CEQA Guidelines* Section 15064.3(b), the significance of transportation impacts is primarily determined by the amount and distance of vehicle travel attributable to a project. Since the vehicle trips generated during the construction phase are temporary and limited to the duration of the construction activities, they do not contribute to a substantial permanent addition of the number of vehicles traveling to the project site or permanent increase in VMT. As a result, the temporary nature of construction-related VMT ensures that it does not have a lasting effect on the overall transportation network or long-term VMT patterns in the area. Therefore, construction of development facilitated by the project would not generate VMT that would be inconsistent with *CEQA Guidelines* Section 15064.3(b).

The proposed project would be consistent with statewide goals aimed at reducing VMT if development facilitated by the project would result in VMT per capita below 15 percent of the baseline average for residential uses and 15 percent below the baseline average VMT per employee for commercial uses. As described under “Significance Thresholds” above, 15 percent below baseline (2023) residential and employment-based VMT is 14.3 VMT per resident and 18.9 VMT per employee, respectively. Table 4.14-2 summarizes the anticipated citywide VMT in 2031 with and without implementation of the project.

Table 4.14-2 Citywide VMT With and Without Project Implementation

	VMT Per Capita	VMT Per Employee
Existing	16.8	22.3
Threshold (15% below existing)	14.3	18.9
2031 No Project	15.5	19.8
Over Threshold?	**Yes**	**Yes**
2031 With Project	14.1	18.6
Over Threshold?	**No**	**No**

VMT = vehicle miles traveled
Source: Appendix E

As shown in Table 4.14-2, the project would result in an estimated average of 14.1 VMT per capita and 18.6 VMT per employee. While the overall population and total VMT would increase in Pacific Grove, the VMT per capita and VMT per employee would decrease compared to existing and 2031 No Project conditions. There are several reasons why VMT per person would decrease while overall VMT in the city would increase, which relate to the increase in density that would be facilitated by the project. Most of the housing sites are located near existing commercial centers with common destinations; by concentrating housing growth near these areas, future residents are anticipated to take fewer or shorter vehicle trips to travel to where they work, shop, or go to school. Lower average trip distances results in lower VMT per capita and per employee. In addition, more housing availability would allow people who work in Pacific Grove to also live in Pacific Grove, which would shorten or eliminate their existing commutes from elsewhere in the city or from outside the city. Overall, VMT per person would decrease under the proposed project because of increased accessibility and shorter travel distances.

As stated under "Methodology" above, the project would conflict or be inconsistent with *CEQA Guidelines* Section 15064.3(b) if VMT generated by the project exceeds an applicable threshold of significance. The applicable threshold of significance for the proposed project is VMT that exceeds levels 15 percent below existing average VMT per capita and per employee. As shown in Table 4.14-2, the project would result in VMT per capita and per employee that is more than 15 percent below existing VMT, and lower than projected VMT per capita and per employee without the project. Therefore, the project would not result in VMT that would be inconsistent with *CEQA Guidelines* Section 15064.3(b) and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Impact TRA-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD COMPLY WITH LOCAL CONSTRUCTION REQUIREMENTS AND DESIGN STANDARDS, WHICH WOULD MINIMIZE THE POTENTIAL TO RESULT IN CIRCULATION HAZARDS DUE TO GEOMETRIC DESIGN FEATURES OR INCOMPATIBLE USES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

During construction of development facilitated by the project, equipment staging and construction vehicles could result in a circulation-related hazard if located in a roadway. In addition, any encroachments required during construction could result in circulation hazards if safety provisions are not implemented. If encroachment is required, project applicants would be required to implement safety features in accordance with Section 15.01.150 of the Pacific Grove Municipal Code. These include the use of lights, warning signs, patrols, and flares to redirect traffic and minimize circulation hazards. Furthermore, development within the Coastal Zone would be required to adhere to Policy INF-16 of the City's LCP, which requires implementation of a construction phase traffic control plan for new development that has the potential to disrupt circulation on arterial or collector streets. Implementation of safety features and traffic control plans in accordance with City requirements would ensure construction activities would minimize the potential to result in circulation hazards due to construction.

The proposed project does not include new roadway, bicycle, pedestrian, and transit infrastructure improvements. Development facilitated by the proposed project would include residential development and would not introduce incompatible uses, such as farm equipment, to roadways. However, development facilitated by the project could result in alterations to existing transportation infrastructure, including, but not limited to, sidewalks, driveways, streetlights and bike/transit facilities or amenities. These alterations, if improperly constructed, could result in geometric design hazards or incompatible uses.

The City maintains standards for public improvements and private facilities within the Pacific Grove Municipal Code (e.g., internal circulation, ingress/egress) that guide the construction of transportation facilities to minimize design hazards for all users of the transportation system. Such standards include roadway width standards established by Pacific Grove Municipal Code Section 24.32.110. As development facilitated by the project is proposed, applicants would be required to design developments to comply with City design guidelines in implementing roadway improvements that are necessary to alleviate transportation hazards. The design of project-specific developments would be reviewed and approved by the City, which would ensure project-specific developments would be designed to minimize the potential to result in hazards between vehicles and pedestrians and vehicles and cyclists.

Adherence to City standards would ensure development facilitated by the proposed project would not introduce features that would substantially increase hazards due to a geometric design feature. Accordingly, the project would have a less than significant impact related to substantially increasing hazards due to a geometric design feature or incompatible use.

Mitigation Measures

No mitigation is required.

Threshold 4: Would the project result in inadequate emergency access?

Impact TRA-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD COMPLY WITH LOCAL CONSTRUCTION REQUIREMENTS AND DESIGN STANDARDS WHICH WOULD MINIMIZE THE POTENTIAL TO RESULT IN INADEQUATE EMERGENCY ACCESS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

There are no specific development projects associated with the proposed project, and specific development facilitated by the project cannot be analyzed for adequacy of emergency access at this time. However, Pacific Grove maintains the roadway network which would provide access to housing sites, upzoning areas, and additional parcels in accordance with industry design standards. Emergency access to development facilitated by the project would be subject to review by the City of Pacific Grove and responsible emergency service agencies, thus ensuring the projects would be designed to meet all emergency access and design standards. The City also requires projects to obtain encroachment permits that include mandated limits on working hours and days, and traffic control plans. If encroachment is required, project applicants would be required to implement safety features in accordance with Section 15.01.150 of the Pacific Grove Municipal Code. These include the use of lights, warning signs, patrols, and flares to control traffic flow and minimize emergency response delays. Section 15.01.150 of the Pacific Grove Municipal Code would require implementation of safety features during construction, which would minimize the potential for construction activities to result in circulation hazards due to construction. Furthermore, development within the Coastal Zone would be required to adhere to Policy INF-16 of the City's LCP, which requires implementation of a construction phase traffic control plan for new development that has the potential to disrupt circulation on arterial or collector streets. Mandatory compliance with these ordinances would minimize temporary obstruction of traffic during site construction.

Additional vehicles associated with development facilitated by the project could increase delays for emergency response vehicles during peak commute hours. However, emergency responders maintain response plans which include use of alternate routes, sirens and other methods to bypass congestion and minimize response times. In addition, the City would review and approve individual projects facilitated by the project to ensure that emergency access meets city standards.

The project would not result in changes to emergency evacuation routes. As part of the proposed project, the City General Plan Health and Safety Element is being updated pursuant to the requirements of AB 747 and SB 99, which have mandated the inclusion of additional assessments and measures associated with emergency evacuation, including identification of emergency evacuation routes and capacity. The updated Health and Safety Element includes the identification of evacuation routes and capacity pursuant to AB 747 and SB 99 as well as updated and revised policies related to emergency response and preparedness. These revisions can be found in Appendix C. At the time of preparation of this DEIR, the proposed revisions to the Health and Safety Element have not yet been finalized. Final revisions are subject to review and approval by the California Board of Forestry and subsequent adoption by the City of Pacific Grove. This process shall be completed prior to certification of the Final EIR and approval of the proposed project. Because the purpose of these revisions is to comply with AB 747 and SB 99, and proposed revisions would be approved by the California Board of Forestry, it is not anticipated that further changes to the proposed revisions would substantially alter the intent of the revisions.

The following goals, policies, and programs of the Updated Health and Safety Element would enhance emergency response and emergency evacuation procedures in the city:

Goal 2. Provide aid to the community as needed in the event of natural or man-made disasters.

- **Policy 6.** Ensure that City emergency response procedures are adequate to deal with natural or man-made disasters in the community.
- **Policy 7.** Periodically update and test the effectiveness of the City's Multi-Hazard Emergency Plan.
- **Policy 8.** Ensure that individuals and agencies assigned emergency responsibilities under the Multi-Hazard Emergency Plan prepare appropriate supporting plans and related standard operating procedures.
- **Policy 9.** Maintain a level of preparedness adequate to implement all parts of the Multi-Hazard Emergency Plan.
  - **Program D.** Periodically review and update alerting procedures and resources lists.
  - **Program E.** Review County and State emergency response plans and procedures to ensure coordination with the City's Multi- Hazard Emergency Plan as part of the periodic update of the City's plan.
  - **Program F.** Develop and implement public information programs concerning disaster response and emergency preparedness.
  - **Program G.** Identify emergency access routes.
  - **Program H.** Include provisions for persons with disabilities in emergency response plans.
  - **Program I.** Identify alternative water sources for fire-fighting purposes for use during a disaster.
  - **Program J.** Designate and develop a command center for use during emergencies.
  - **Program K.** Develop and maintain mutual aid agreements and communications links with surrounding jurisdictions for assistance during emergencies.

Development facilitated by the project, as well as all development in the project area, must comply with roadway width standards established by Pacific Grove Municipal Code Section 24.32.110. Further, future development would be reviewed by the Monterey Fire Department, to ensure development would not interfere with evacuation routes and would not impede the effectiveness of evacuation plans.

Therefore, the project would not impair implementation of or physically interfere with evacuation or emergency response plans. The impact related to emergency response and evacuation plans would be less than significant.

Mitigation Measures

No mitigation is required.

4.14.4 Cumulative Impacts

The geographic scope for cumulative transportation impacts related to conflicts with transportation policies is the AMBAG region (Monterey, Santa Cruz, and San Benito counties). This geographic scope is appropriate because cumulative development in this region would be subject to the same circulation-related programs, plans, ordinances, and policies as the proposed project. Cumulative development would be required to demonstrate consistency with the AMBAG MTP/SCS, as well as applicable jurisdiction's Transportation Element, which guide the continued development and improvement of the transportation system. Cumulative development would include sufficient bicycle infrastructure in accordance with each jurisdiction's requirements, which would promote alternative transportation. As a result, cumulative development would not result in a cumulatively considerable impact related to conflict with a program, plan, ordinance, or policy addressing the circulation system (Threshold 1).

The geographic scope for cumulative transportation impacts related to VMT increases is the AMBAG region. This geographic scope is appropriate because VMT is often considered at a regional scale, as vehicle trips can start in one region or city and end in another. Significant cumulative VMT impacts could occur from cumulative development if cumulative development would raise VMT in Pacific Grove beyond established thresholds. Based on technical guidance from LCI, if a project has a less than significant project impact on VMT, the project would not contribute to a cumulative VMT impact. As described in Impact TRA-1and Impact TRA-2, the project would be consistent with the 2045 MTP/SCS and would have a less than significant VMT impact as VMT per capita and VMT per employee would be below significance thresholds with project implementation. Therefore, the proposed project's contribution to cumulative VMT impacts (Threshold 2) would not be cumulatively considerable.

The geographic scope for cumulative transportation impacts related to emergency access and transportation hazards is the AMBAG region. This geographic scope is appropriate because cumulative development and growth in the region could impact emergency access at a local and regional level. Cumulative development could result in physical changes that could result in transportation hazards or affect emergency access. However, impacts to emergency response and evacuation of cumulative development would be evaluated on a case-by-case basis, and the jurisdiction in which cumulative development is located (e.g., Pacific Grove, Monterey, or unincorporated portions of Monterey County) would review and approve individual cumulative development projects to ensure that emergency access meets applicable local standards and that transportation hazards are avoided. In addition, regional emergency access is coordinated in the Monterey County Multi-Jurisdictional Hazard Mitigation Plan, which would further facilitate regional emergency preparedness. All jurisdictions must also comply with AB 747 and SB 99, which would facilitate identification of emergency access routes and identify potential emergency access constraints. Therefore, cumulative impacts related to transportation hazards and emergency access (Threshold 3 and 4) would not occur.

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4.15 Tribal Cultural Resources

This section analyzes the proposed project's potential impacts on tribal cultural resources. Tribal cultural resources are those resources identified by California Native American Tribes in consultation with lead agencies during tribal consultation (also referred to as Assembly Bill [AB] 52/Senate Bill [SB] 18 consultation).

4.15.1 Setting

a. Ethnographic Setting

The project area is located in the traditional territory of the Ohlone (or Costanoan) people. According to early ethnographers, Ohlone territory extends along the California coast from the point where the San Joaquin and Sacramento rivers merge into the San Francisco Bay to Point Sur. Their inland boundary was limited to the interior Coast Ranges. The Ohlone language belongs to the Penutian family, with several distinct dialects throughout the region (Kroeber 1925). Ethnographers divided it into eight regional dialects: Karkin, Chochenyo, Ramaytush, Awaswas, Taymen, Mutsun, Rumsen, and Chalon (Milliken et al. 2009; Jones 2015).

The pre-contact Ohlone were semi-sedentary with a settlement system characterized by base camps and seasonal reserve camps composed of tule reed houses with thatched roofs made of matted grass (Schick 1994: 17; Skowronek 1998). Just outside base camps, large sweat houses were built into the ground near stream banks used for spiritual ceremonies and possibly hygiene (Jones 2015; Schick 1994: 17). Villages were divided into small polities, each of which was governed by a chief responsible for settling disputes, acting as a war leader during times of conflict, and supervising economic and ceremonial activities (Skowronek 1998; Kroeber 1925). Social organization appeared flexible to ethnographers, and any sort of social hierarchy was not apparent to mission priests (Skowronek 1998).

Archaeological investigations helped inform Ohlone mortuary rituals along with ethnographic evidence. Cemeteries were set away from villages and visited during the annual Mourning Anniversary (Leventhal and DiGiuseppe 2009). Ceremonial human grave offerings might include Olivella beads, as well as tools like drills, mortars, pestles, hammerstones, bone awls, and utilized flakes (Leventhal and DiGiuseppe 2009). Ohlone mythology includes animal characterization and animism, which was the basis for several creation narratives. Ritually burying animals, such as a wolf, squirrel, deer, mountain lion, gray fox, elk, badger, grizzly bear, blue goose, and bat ray, was commonly practiced. Similar to human burials, ceremonial offerings were added to ritual animal graves like shell beads, ornaments, and exotic goods (Kroeber 1925; Field and Leventhal 2003; Jones 2010).

Ohlone food sources were based on hunting, gathering, and fishing (Kroeber 1925; Skowronek 1998). Larger animals, like bears, might be avoided, but smaller game was hunted and snared on a regular basis (Schick 1944: 17). The acorn was an important staple and was prepared by leaching acorn meal in openwork baskets and in holes dug into the sand (Kroeber 1925; Levy 1978). The Ohlone also practiced controlled burning to facilitate plant growth (Kroeber 1925; Skowronek 1998). During specific seasons or in times of drought, the reserve camps would be utilized for gathering seasonal food and accessing food storage (Schick 1994: 16). The Ohlone fished from tule reed canoes using nets and gorge hooks (Schick 1994: 16-17). Mussels were a particularly important food resource. Sea mammals such as sea lions and seals were hunted, and beached whales were consumed (Kroeber 1925).

Seven Franciscan missions were built in Ohlone territory in the late 1700s, and all members of the Ohlone group were eventually brought into the mission system (Kroeber 1925; Skowronek 1998; Milliken et al. 2009). After the establishment of the missions, Ohlone population dwindled from roughly 10,000 people in 1770 to 1,300 by 1814 (Skowronek 1998). In 1973, the population of people with Ohlone descent was estimated at fewer than 300. The descendants of the Ohlone united in 1971 and have since arranged political and cultural organizations to revitalize aspects of their culture (Skowronek 1998). Today, the descendant communities of the Ohlone can be found in multiple tribes throughout Northern and Central California.

4.15.2 Regulatory Setting

a. **State** Regulations

Assembly Bill 52 of 2014

AB 52 establishes, "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code [PRC] Section 21084.2). It further states the CEQA lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074(a)(1)(A) and (B) define tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and that meets at least one of the following criteria, as summarized in Appendix G of the *CEQA Guidelines*:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k).
2. 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 PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process with California Native American tribes that must be completed before a CEQA document can be certified. Under AB 52, tribes must first submit a written request to a lead agency to be placed on that agency's AB 52 notification list. Once on the notification list, the lead agency is required to notify the tribe of any proposed project that is subject to CEQA and located within the geographic area that the tribe is traditionally or culturally affiliated with. This notification must occur within 14 days of determining that an application is complete or deciding to undertake a project. The tribe has 30 days from receipt of the notice to request formal consultation. If a formal consultation request is timely submitted, the lead agency is required to initiate consultation with the tribe. Consultation concludes either when the lead agency and the tribe agree on potential impacts and, if necessary, appropriate mitigation, or when the lead agency, after a good faith effort, determines that mutual agreement cannot be reached. This process must be completed before the CEQA document can be certified.

California Public Resources Code Section 5097.98

PRC Section 5097.98 states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those

persons (i.e., the Most Likely Descendant) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the Most Likely Descendant may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The Most Likely Descendant shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

b. Local Regulations

Pacific Grove General Plan

The Historical and Archaeological Resources Element of the City Pacific Grove's General Plan (1994) identifies four goals in preserving cultural resources within the city. The Archaeological Goals, Policies, and Programs section of the chapter identifies the following policies regarding preservation of the City's archaeological resources, which in some cases may also be considered tribal cultural resources:

- **Policy 20.** Support the enforcement of existing State and federal laws pertaining to pilfering of archaeological sites.
- **Policy 21.** Ensure the protection and preservation of artifacts in those areas already identified as containing archaeological remains.
- **Policy 22.** Work with the California Archaeological Inventory to develop information that will allow the prediction of additional sites likely to contain archaeological remains.
- **Policy 23.** Refer development proposals that may adversely affect archaeological sites to the California Archaeological Inventory.

The City also outlines the following measures before issuing any permits for development or beginning any project within areas potentially containing archaeological resources:

  - **Program AA.** Inspect the surface of sites which potentially contain archaeological resources and evaluate site records to determine the extent of known archaeological resources.
  - **Program BB.** Require that all sites with potential resources likely to be disturbed by a proposed project be analyzed by a qualified archaeologist with local expertise.
  - **Program CC.** Require that a mitigation plan, adequate to protect the archaeological resource and prepared by a qualified archaeologist, be submitted for review and, if approved, be implemented as part of the project.
  - **Program DD.** Identify sensitive sites early, so that archaeological resources can be considered and protected during the first phases of project design.
  - **Program EE.** Where an archaeological site is in proximity to a project under review, City staff in conjunction with the California Archaeological Inventory will determine the particular qualities to be preserved and the methods of preservation.

Pacific Grove Local Coastal Program

The City Pacific Grove Local Coastal Program, adopted in 2020, provides goals and policies relating to tribal cultural resources. The program governs land use and development specifically within the Pacific Grove Coastal Zone, which is comprised of approximately 458 acres of land. The Cultural Resources section of the Land Use Plan Policies provides the following policies regarding tribal cultural resources:

- **Policy CRS-1.** The City will conduct consultations with any federally-recognized California tribal government listed on the most recent notice of the United States Federal Register and any non-federally recognized California tribe listed on the California Tribal Consultation List maintained by the California Native American Heritage Commission that identifies as native to the Monterey Peninsula, including the Ohlone Costanoan Esselen Nation, in accordance with state law.
- **Policy CRS-2**. The City will ensure the protection, preservation, and proper disposition of archaeological resources within the Coastal Zone by assessing the potential impact of proposed development and ensuring, to the maximum extent feasible, that tribal concerns are considered before actions on proposed development are taken and that such impacts are avoided, minimized, or mitigated in conformity with the Coastal Act and other applicable legal requirements.

4.15.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

In accordance with AB 52, the City conducted tribal consultation as the lead agency. The City's consultation efforts and subsequent communication with contacted tribes is summarized herein.

The City holds regular, informal consultation meetings with tribes affiliated with the city's geographic area. The City received a request for consultation from the Esselen Tribe of Monterey County, and met with both the Esselen Tribe of Monterey County and the Ohlone Costanoan Esselen Nation during regularly scheduled meetings, where the project was discussed. No tribal cultural resources specific to the project area were identified during these meetings; however, the Esselen Tribe of Monterey County identified that the project area is within the Tribe's cultural and ancestral landscape (Esselen Tribe Of Monterey County 2024).

In addition, in accordance with AB 52, the City sent written communication regarding the project via certified mail on April 24, 2025, to nine tribes:

- Amah Mutsun Tribal Band
- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Costanoan Rumsen Carmel Tribe
- Esselen Tribe of Monterey County
- Indian Canyon Mutsun Band of Costanoan
- KaKoon Ta Ruk Band of Ohlone-Costanoan Indians of the Big Sur Rancheria
- Ohlone Costanoan Esselen Nation
- Rumsen Am:a Tur:ataj Ohlone
- Wuksache Indian Tribe/Eshom Valley Band

Tribes have 30 days to respond and request consultation under AB 52. The AB 52 consultation request period for the above tribes ended on May 27, 2025. The City received certified mail receipts from all of the above tribes except the Ohlone Costanoan Esselen Nation. The City did not receive any responses or requests for consultation under AB 52.

Significance Thresholds

Appendix G of the *CEQA Guidelines* indicates that a project's impacts to tribal cultural resources would be significant if the project would:

1. 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:
   a. 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
   b. 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.

b. Project Impacts and Mitigation Measures

Threshold 1: 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:

a. 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
b. 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?

Impact TCR-1 NO TRIBAL CULTURAL RESOURCES LISTED OR ELIGIBLE FOR LISTING IN THE CRHR OR A LOCAL REGISTER, NOR ANY DETERMINED SIGNIFICANT BY THE CITY OF PACIFIC GROVE, WERE IDENTIFIED WITHIN OR NEAR THE PROJECT AREA. NO IMPACT WOULD OCCUR.

As discussed above under "Methodology," as part of its tribal cultural resource identification process under AB 52, the City sent letters to nine Native American Tribes that are traditionally and culturally affiliated with the project area on April 24, 2025. The City did not receive a request for consultation from any of the contacted tribes, and the AB 52 consultation period closed on May 27, 2025. Accordingly, AB 52 consultation is complete for the project.

As individual projects are proposed, if subject to CEQA, site-specific consultation would be required in accordance with AB 52, which could identify site-specific resources or sensitivity and appropriate mitigation measures. Future development facilitated by the project in the Coastal Zone would also be required to evaluate project-specific tribal cultural resources identification and consultation, and to implement appropriate avoidance, minimization, or mitigation, as described in Policies CRS-1 and CRS-2 of the Pacific Grove Local Coastal Program. However, specific development projects occurring

on identified housing sites, in upzoning areas, or on additional parcels may be located outside of the Coastal Zone and/or may not be subject to CEQA and therefore would not be subject to the requirements of AB 52 or the Local Coastal Program.

No tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources were identified within the project area. In addition, no tribal cultural resources were identified within or near the project area that have been determined by the City of Pacific Grove, as the CEQA lead agency, to be significant. Therefore, the project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k) or that is a resource determined by Pacific Grove (the lead agency), in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). No impact would occur.

Mitigation Measures

No mitigation is required.

4.15.4 Cumulative Impacts

The geographic scope for cumulative tribal cultural resources impacts is the entirety of Pacific Grove in addition to the surrounding Monterey Bay area, representing the traditional territory of the Esselen and Ohlone. This geographic scope is appropriate because tribal cultural resources have the potential to extend across the large areas. Cumulative buildout in this region, including projects listed in Table 3-1 and shown on Figure 3-1, would have the potential to significantly impact tribal cultural resources through the disturbance of areas with the potential to contain tribal cultural resources. Cumulative impacts would be significant. Potential impacts associated with individual cumulative projects would be addressed on a case-by-case basis and would be subject to state regulations regarding the treatment of tribal cultural resources.

As described under Impact TCR-1, the proposed project would have no impact to tribal cultural resources. Therefore, the cumulative impact related to tribal cultural resources would not be cumulatively considerable.

4.16 Utilities and Service Systems

This section evaluates the potential environmental effects of the proposed project related to water supply, wastewater generation, stormwater drainage, solid waste, electricity, natural gas, and telecommunication facilities. The analysis includes a review of existing utility infrastructure and the need for expanded or new utility infrastructure. Water quality, drainage, and groundwater are also discussed in Section 4.9, *Hydrology and Water Quality*.

4.16.1 Setting

The environmental setting for utilities and service systems describes the availability and condition of water supplies, existing facilities and capacity for wastewater treatment and disposal, existing stormwater management facilities to control drainage and runoff, existing solid waste collection and disposal systems, and the existing availability of electricity, natural gas, and telecommunications services.

a. Water Supply

Water supply in the project area is provided by the California-American Water Company (Cal-Am). The project is located within Cal-Am's Monterey Service Area of the Central Division, also referred to as "Monterey Main." The Cal-Am Monterey Main system serves the incorporated cities of Monterey, Pacific Grove, Carmel-by-the-Sea, Del Rey Oaks, Sand City, a portion of Seaside, Hidden Hills and Ryan Ranch subdivisions, Bishop subdivision including the area known as Laguna Seca Ranch Estates, and certain unincorporated areas in the County of Monterey.

Cal-Am is a public water utility that holds entitlements to surface water and groundwater supplies, and owns the facilities used to divert and distribute water supply throughout its service area. Cal-Am also partners with local jurisdictions and agencies including the Monterey Peninsula Water Management District (MPWMD) on water supply improvement projects. While Cal-Am is a public utility responsible for providing a reliable water supply source to its customers, MPWMD is a water management agency responsible for ensuring the sustainability of local resources. As a public utility, Cal-Am is regulated by the California Public Utilities Commission (CPUC). In the event of a water shortage emergency, Cal-Am must notify CPUC and request authorization to implement demand reduction measures from its Water Shortage Contingency Plan (WSCP), and the MPWMD then implements the appropriate stage and enforcement action to address shortage conditions (Cal-Am 2021b: 14).

Monterey Peninsula Water Supply Project

A key component of Cal-Am's water supply portfolio and supply reliability planning for the Monterey Main system is the Monterey Peninsula Water Supply Project (MPWSP). The MPWSP is part of a comprehensive, multi-pronged supply strategy designed to protect the Carmel River and critical habitats that depend on the river, while providing drought-proof water supply sources for use throughout Cal-Am's Monterey Main system (Cal-Am 2022a). The MPWSP involves multiple aspects of Cal-Am's water supply portfolio for the Monterey Main system and aims to improve reliability through the availability of a drought-proof water supply source that can be used to support recharge and recycling as well as other supply development efforts discussed below.

The MPWSP Ocean Desalination Plant was developed under the MPWSP in response to state and court-ordered reductions in use of Carmel River water and adjudication of the Seaside Groundwater Basin (Cal-Am 2022b). As discussed below, the MPWSP Ocean Desalination Plant is on schedule to begin producing potable water in 2030 (Cal-Am 2024a, 2024b). This new source of potable water will improve the reliability of multiple existing supply projects and collaborative efforts, including aquifer storage and recovery (ASR) being conducted by Cal-Am and MPWMD, as well as wastewater treatment and recycling with the Pure Water Monterey (PWM) Project and planned PWM Expansion Project, being conducted through collaboration between Cal-Am, MPWMD, and Monterey One Water (M1W), formerly the Monterey Regional Water Pollution Control Agency.

Cal-Am Monterey Main Water Supply Sources

Cal-Am's water supply portfolio for the Monterey Main system consists of the following sources, which are discussed under respective headings below (Cal-Am 2021a).

- Carmel River Aquifer (3,376 Acre-Feet per Year [AFY])
- Seaside Groundwater Basin (1,474 AFY until 2030, then 774 AFY)
- ASR Program (920 AFY)
- PWM Project (3,500 AFY)
- Sand City Desalination Plant (94 AFY)
- MPWSP Ocean Desalination Plant (6,252 AFY after 2030)
- PWM Expansion Project (528 AFY in 2025, up to 2,250 AFY by 2040)

Carmel River Aquifer

Cal-Am extracts water from wells located in the Carmel River Aquifer, which is located along the Carmel River, southeast of the project area. The aquifer is identified by the Department of Water Resources (DWR) as a high-priority basin, which would make it subject to management under the Sustainable Groundwater Management Act (discussed in Section 4.16.2, *Regulatory Setting*); however, withdrawals from the Carmel River Aquifer are being regulated by the State Water Resources Control Board (SWRCB) through surface water rights, and the basin is therefore not managed through the Sustainable Groundwater Management Act (Cal-Am 2021a: 6-2).

The Carmel River Aquifer is subject to SWRCB jurisdiction because it is defined as a subterranean stream due to connectivity with the Carmel River. Prior to 1995, Cal-Am diverted an average of 14,106 AFY from the Carmel River (via pumping from the Carmel River Aquifer). In 1995, the SWRCB issued Order WR 95-10 requiring Cal-Am to reduce its diversions of Carmel River water to 3,376 AFY, consistent with pre-1914 appropriative rights, riparian rights, and License #0011866. In 2009, the SWRCB issued an order to Cal-Am to cease and desist all unauthorized diversions of water from the Carmel River by the end of 2016, which was later extended through 2021 with the SWRCB's issuance of Order WR 2016-0016 (Cal-Am 2021a: 6-2). The SWRCB's cease-and-desist order imposed a moratorium on all new water service connections within Cal-Am's Monterey Main service area, which is separate from the moratorium required in Cal-Am's WSCP as a Stage 4 drought response measure; see Section 4.16.2(b) for further discussion.

As detailed in its 2020 Urban Water Management Plan (UWMP), Cal-Am has complied with Order WR 2016-0016 to cease unauthorized diversions and, in compliance with Order WR 95-10, Cal-Am's use of Carmel River water is limited to 3,376 AFY.

Seaside Groundwater Basin

The Seaside Groundwater Basin overlies and is a subbasin within the Salinas Valley Groundwater Basin. Cal-Am has a total entitled water right of 1,474 AFY from the Seaside Groundwater Basin for use in the Monterey Main System. However, in 2006, groundwater pumping rights in the Seaside Groundwater Basin were contested in court (*California American Water Company v. City of Seaside et al, Monterey Superior Court*, Case No. M66343, March 27, 2006). The solution set forth by Monterey Superior Court was an adjudication judgment that limits the rights of Cal-Am and other users to pump groundwater from the Seaside Groundwater Basin.

In accordance with the adjudication judgment and as detailed in its 2020 UWMP, Cal-Am is required to reduce its pumping from the Seaside Groundwater Basin by 700 AFY once a new reliable water supply source is operational. As discussed under respective headings below, the MPWSP Ocean Desalination Plant is anticipated to be operational in 2030 and will serve the region as a new reliable water supply source. Beginning in 2030, Cal-Am would then reduce its pumping from the Seaside Groundwater Basin to 774 AFY (its current 1,474-AFY entitlement minus 700 AFY). This reduction would continue for at least 25 years, through 2055, as part of an over-pumping repayment plan defined by the adjudication judgment (Cal-Am 2021a: E-4).

Aquifer Storage and Recovery Program

MPWMD and Cal-Am developed an ASR Management and Operations Agreement in 2006, under which they jointly implement an ASR program to store excess Carmel River flows in the Coastal Subbasin of the Seaside Groundwater Basin, for later extraction and use during dry weather conditions. Injection of excess river flows is generally conducted between December and May, with later extraction and use conducted between July and November, as needed. The ASR program was developed in two phases and is regulated by SWRCB permits. Phase 1 is regulated under SWRCB Permit No. 20808A, which permits the withdrawal of 2,426 AFY from Santa Margarita Well Nos. 1 and 2, and Phase 2 is regulated under SWRCB Permit No. 20808C, which permits the withdrawal of 2,900 AFY from the Seaside Middle School Well Nos. 3 and 4 (Cal-Am 2021a: 6-7).

Cal-Am began utilization of ASR in 2008 and is currently receiving water produced at its Santa Margarita Well No. 1. Diversions for the ASR system are contingent on maintaining minimum daily instream flows in the Carmel River. Therefore, the system is highly sensitive to changes in precipitation and streamflow that can vary substantially from year to year. Cal-Am's projected supply from the ASR system is approximately 920 AFY, based upon the last three years prior to preparation of Cal-Am's 2020 UWMP (Cal-Am 2021a: 6-8).

Pure Water Monterey Project

The PWM Project is a joint effort between MPWMD and M1W, which provides wastewater collection and treatment services to the Cal-Am Monterey Main service area, including Pacific Grove. M1W operates the M1W Regional Treatment Plant, which treats wastewater collected throughout its service area to various levels of treatment, from secondary treatment to Title 22 tertiary disinfected treatment standards. The PWM Project conducts advanced water quality treatment and purification using flows from the M1W Regional Treatment Plant; the treated water is then injected into the Seaside Groundwater Basin, where it blends with the existing groundwater and is available for pumping as a potable water supply source (Cal-Am 2021a: 6-10).

Cal-Am holds a contractual agreement for 3,500 AFY of potable water from the PWM Project. This full contractual amount is available during normal hydrologic years. During single-dry and multiple dry year conditions, the PWM Project is not currently 100 percent reliable due to limitations in the flows of source water (wastewater conveyed to the M1W Regional Treatment Plant), because water supply availability and use reduce during dry year conditions, which subsequently reduces wastewater flows (Cal-Am 2021a: 6-13). Therefore, supplemental source flow is needed for the PWM Project to produce reliable supply during all hydrologic conditions; this will be provided by the MPWSP Ocean Desalination Plant (discussed below). Once operational, the MPWSP Ocean Desalination Plant will provide a consistent flow of source water for the PWM Project, thereby facilitating fulfillment of Cal-Am's 3,500 AFY contract during all hydrologic years.

Sand City Desalination Plant

The Sand City Desalination Plant was constructed by Sand City in 2009 as part of the city's Water Supply Project. The plant uses brackish water from the Aroma Sands Formation Aquifer near Monterey Bay. It includes a reverse osmosis (RO) desalination plant, a pipeline to deliver treated water to customers within Sand City, two water storage tanks, and a connection to Cal-Am's Monterey Main distribution system, which serves the proposed project area. Cal-Am began operating and distributing water from the plant in 2010. The Sand City Desalination Plant is designed to produce up to 300 AFY of desalinated water, of which Cal-Am has an allocation of 94 AFY. The remaining 206 AFY, when available, is reserved for future development and redevelopment within Sand City. Cal-Am may use water from the 206 AFY until it is needed for future development or redevelopment within Sand City (Cal-Am 2021a: 6-17).

Monterey Peninsula Water Supply Project Ocean Desalination Plant

The MPWSP Ocean Desalination Plant would be constructed near the M1W Regional Treatment Plant, discussed above under *Pure Water Monterey Project*, and would produce up to 6,252 AFY of potable water using seawater filtered through the ocean floor. Treatment technologies would include reverse osmosis, and the resulting brine would be blended with other treated effluent and discharged to the ocean via the existing outfall at the Regional Treatment Plant. Portions of the MPWSP Ocean Desalination Plant have been constructed or are currently under construction, including 5,300 new feet of transmission main (Cal-Am 2021a: 6-18).

Cal-Am completed environmental review of the MPWSP Ocean Desalination Project with a joint Final Environmental Impact Report and Environmental Impact Statement that was certified on September 14, 2018, with CPUC as the CEQA Lead Agency and the Monterey Bay National Marine Sanctuary as the National Environmental Policy Act Lead Agency. SWRCB also issued a Final Opinion for the project which stated that Cal-Am does not require water rights to pump ocean water (Cal-Am 2022b). The MPWSP received approval of the California Coastal Commission in November of 2022 (Cal-Am 2024b). Cal-Am is currently addressing 20 conditions of approval outlined in the Coastal Development Permit issued by the California Coastal Commission. Cal-Am anticipates satisfying all conditions by late 2025 or early 2026 with the project on schedule to begin operation in 2030 (Cal-Am 2024b). There are several lawsuits and groups in opposition to the project.

Pure Water Monterey Expansion Project

The PWM Expansion Project is an extension of the PWM Project and would provide an additional 2,250 AFY of potable water that Cal-Am would access via pumping from the Seaside Groundwater Basin. M1W anticipates the PWM Expansion Project to be operational by late 2025, with source

flows from the M1W Regional Treatment Plant (MPWMD 2024). In late 2025, approximately 528 AFY of water is expected to be available from the PWM Expansion Project under normal hydrologic conditions. This supply will increase in correlation to the availability of source flow from the MPSWP Desalination Plant, anticipated to be operational in 2030, as well as increasing wastewater flows from population growth (Cal-Am 2021a: 6-10).

Pacific Grove Local Water Project

The Pacific Grove Local Water Project was developed to reduce the City's reliance on purchased potable water for irrigation by constructing a reclaimed water treatment facility. Before the project, Pacific Grove purchased approximately 125 AFY of potable water from Cal-Am to irrigate the Pacific Grove Golf Links, El Carmelo Cemetery, and other public, landscaped areas. In 2014, the City proposed to construct the Satellite Reclaimed Water Treatment Plant at the former Point Pinos Wastewater Treatment Plant site near the Pacific Grove Golf Links. This facility, designed to treat up to 0.25 million gallons of water per day, now supplies recycled water for irrigation of the Pacific Grove Golf Links and El Carmelo Cemetery and eliminates the need to purchase potable water for irrigation from Cal-Am (City of Pacific Grove 2015: 2-3). The Local Water Project made 125 AFY of potable water available for use in the Cal-Am service area. In 2016, MPWMD adopted Ordinance No. 168 which entitled the City to up to 66 AFY of the 125 AFY of potable water made available by the Local Water Project (MPWMD 2016: 4).

b. Wastewater

The City's collection and conveyance system is comprised of approximately 58 miles of pipelines: 57 miles of gravity pipelines, which vary in diameter from 4-inch to 18-inch, and one mile of force mains (City of Pacific Grove 2013: 4-1). Maintenance access to the sewers is provided by 904 manholes and a number of structures, such as clean-outs and inspection holes (City of Pacific Grove 2013: 4-3). There are nine lift stations located in the City's service area. These stations are provided with a duplex pumping system for reliability and allow for continued operation of a lift station in the event of pump failure. All nine lift stations are operated and maintained by M1W. Seven are owned by the City and the two largest are owned by M1W. There is one mile of force mains immediately downstream of these lift stations. The City owns and maintains 5,000 feet of these force mains, and M1W owns and maintains the remaining 280 feet (City of Pacific Grove 2013: 4-14).

Wastewater in the City of Pacific Grove is treated at the M1W Regional Wastewater Treatment Plant in the City of Marina, conveyed via an interceptor pipeline that is located along the coast through the cities of Monterey, Seaside, and Marina (City of Pacific Grove 2025a, M1W 2025a). The Regional Wastewater Treatment Plant receives and treats residential, commercial, and industrial wastewater. Wastewater undergoes primary and secondary treatment at the treatment plant before discharge to the ocean, tertiary treatment for recycled water use, or advanced treatment for groundwater replenishment (M1W 2025a). Recycled water is generally for agricultural applications and irrigation. In winter months, treated wastewater from the Regional Wastewater Treatment Plant is primarily discharged.

The treated wastewater discharge is regulated by the Central Coast Regional Water Quality Control Board (RWQCB) under the Waste Discharge Requirements for the Monterey Regional Water Pollution Control Agency[1] Treatment Plant (Order No. R3-2018-0017, NPDES Permit No. CA0048551), as described in the regulatory framework discussion below. Pursuant to the permit, the Regional Wastewater Treatment Plant has a maximum average dry weather design treatment

[1] Now referred to as M1W.

capacity of 29.6 million gallons per day and peak wet weather design capacity of 75.6 million gallons per day. The diffuser outlet in Monterey Bay is designed to convey ultimate wet weather flows of 81.2 million gallons daily, which is the permitted rate of discharge through the outfall.

M1W provides regional wastewater treatment services to over 250,000 people, treats an average of 18 million gallons of municipal wastewater per day, and recycles approximately four billion gallons of water annually for crop irrigation (M1W 2025b). The Regional Wastewater Treatment Plant has capacity for up to 29.6 million gallons per day (M1W 2025b). Thus, the Regional Wastewater Treatment Plant had an unused but permitted treatment capacity of approximately 11.6 million gallons per day[2] during dry weather conditions.

In 2019, the M1W Advanced Water Purification Facility was brought online, expanding M1W's treatment capacity to include full advanced treatment, which consists of ozone, membrane filtration, reverse osmosis, advanced oxidation using ultraviolet light and hydrogen peroxide, and finished water stabilization (Central Coast RWQCB 2024). A portion of secondary-treated effluent from the regional treatment plant is routed to the Advanced Water Purification Facility for advanced treatment. The produced purified water is injected into the Seaside groundwater basin for drinking water supply augmentation, and a small portion is used for landscape irrigation by users in Marina Coast Water District. At the time of this report, the Advanced Water Purification Facility is currently undergoing an expansion to increase production capacity from 5 million gallons per day to 7.6 million gallons per day (Central Coast RWQCB 2024). The Advanced Water Purification Facility expansion is expected to be complete by late 2025.

c. Stormwater

The City owns and maintains a storm drain system that includes a series of storm drains and gutters on streets as well as pipes and outfalls, where the stormwater enters the Monterey Bay and ultimately the greater Pacific Ocean. The City has five major storm drain lines, all of which collect stormwater runoff at higher elevations and dispose of it offshore. The city is divided into two major drainage basins, each draining approximately half the city. The southwesterly basin drains westward into the Pacific Ocean and the northeasterly basin drains northerly into Monterey Bay and into the Pacific Grove Area of Special Biological Significance (ASBS) (City of Pacific Grove 2024, 1994: 4). The drainage flows on the surface on private properties and public streets, and in underground culverts (City of Pacific Grove 2020: 19-3). The City's Municipal Separate Storm Sewer System flows directly into water bodies without any treatment prior to discharge. Stormwater discharges consist of surface water runoff generated from various land uses. The quality of these discharges varies and is affected by geology, land use, season, hydrology, and sequence and duration of hydrologic events (City of Pacific Grove 2016).

As discussed within Section 4.9, *Hydrology and Water Quality*, the SWRCB designates 34 coastal regions in the California Ocean Plan as ASBS in an effort to preserve these unique and sensitive marine ecosystems for future generations. The Pacific Grove ASBS covers 3.2 miles of Pacific Grove coastline west from the Monterey Bay Aquarium to Asilomar Boulevard just before Point Pinos. The ASBS receives runoff from approximately 1,106 acres in Pacific Grove and 103 acres in Monterey including a small portion from the federal United States Army Presidio of Monterey (City of Pacific Grove 2025b). More than 40 percent of areas draining into the ASBS are impervious surfaces that are conveyed by the City's stormwater infrastructure (City of Pacific Grove 2020: 13-2).

[2] 11.6 million gallons per day = 29.6 million gallons per day capacity - 18 million gallons per day average.

d. Solid Waste

The City contracts with GreenWaste Recovery to provide trash, recycling and yard waste collection services to residents and commercial businesses within the city. Nearly all solid waste generated in Pacific Grove is transported to and disposed of at the Monterey Peninsula Landfill and Materials Recovery Facility, which is operated by the Monterey Regional Waste Management District, also known as ReGen Monterey. The landfill and facility site consists of 466 acres and is located in Marina, at 14201 Del Monte Boulevard, approximately 10 miles northeast of the project area.

According to California's Department of Resources Recycling and Recovery (CalRecycle), peak volume for incoming waste materials at the Monterey Peninsula Landfill shall not exceed 3,500 tons per day (CalRecycle 2025). The maximum permitted capacity of the landfill is 49,700,000 cubic yards. The remaining capacity of the landfill is approximately 48,560,000 cubic yards with an estimated closure date of February 28, 2107 (CalRecycle 2025).

e. Electricity

Homes and businesses in Pacific Grove use electricity from various sources, including wind, solar, hydroelectric, nuclear, coal, and natural gas. The main electricity provider in the region is Central Coast Community Energy, which provides renewable electricity via Pacific Gas and Electric Company (PG&E) electricity transmission lines. Energy is discussed in more detail in Section 4.5, *Energy*.

f. Natural Gas

California relies on out-of-state natural gas imports for nearly 90 percent of its natural gas supply. The California Energy Commission (CEC) estimates that approximately 45 percent of the natural gas burned across the state is used for electricity generation, and much of the remainder is consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors. Building and appliance energy efficiency standards account for up to 39 percent in natural gas demand savings since 1990 (CEC 2025a).

The city is in PG&E's natural gas service area, which spans central and northern California (PG&E 2014). PG&E's service area is equipped with approximately 6,700 miles of gas transmission pipelines and 42,000 miles of gas distribution pipelines (PG&E 2025). A large-diameter gas transmission pipeline runs along State Route 1, southeast of the project area (PG&E 2025). In 2022, PG&E customers consumed 4.4 billion therms of natural gas. Residential users accounted for approximately 42 percent of PG&E's natural gas consumption (CEC 2025b). The remainder was used for industry (31 percent), commercial buildings (20 percent), mining and construction (5 percent), other commercial (1 percent), and agricultural and water pump accounts (1 percent) (CEC 2025b). In 2022, Monterey County users accounted for less than one percent of PG&E's total natural gas consumption across the entire service area (CEC 2025c).

g. Telecommunications

In California, approximately 98 percent of households have access to telecommunication infrastructure, including telephone and cable access (California Cable & Telecommunications Association 2019). The project area located in area code 831 and Local Access and Transport Area 8 (CPUC 2010). A Local Access and Transport Area is a geographical area within which a divested Regional Bell Operating Company is permitted to offer exchange telecommunications and exchange access services (CPUC 2025).

The project area is located in AT&T California's carrier of last resort territory. A carrier of last resort is a telecommunications company that commits, or is required by law, to provide service to any customer in a service area that requests it, even if serving that customer would not be economically viable at prevailing rates (CPUC 2018). Internet providers that service the city include Xfinity, AT&T Fiber, Viasat, EarthLink, and Razzolink (HighSpeedInternet.com 2025). Additionally, a number of wireless data and cellular phone companies provide service options to residents.

4.16.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The federal Clean Water Act (CWA), enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several state and local laws throughout the country. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gave the United States Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the CWA is administered by USEPA and United States Army Corps of Engineers.

Section 402 of the CWA requires that all construction sites on an acre or greater of land, as well as municipal, industrial, and commercial facilities discharging wastewater or stormwater directly from a point source, such as a pipe, ditch, or channel, into a surface water of the United States must obtain permission under the National Pollutant Discharge Elimination System (NPDES) permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

In California, the NPDES program is administered by the SWRCB through the RWQCBs and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. Discharges from the City of Pacific Grove's storm drain system are permitted under NPDES General Permit for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems, Order No. 2013-0001-DWQ (MS4 General Permit). A discussion of the NPDES permit and other regulations and policies applicable to stormwater management and stormwater discharges is provided in Section 4.9, *Hydrology and Water Quality*.

Safe Drinking Water Act

The Safe Drinking Water Act (42 United States Code Section 300[f] et seq.; 40 Code of Federal Regulations Section 141 et seq.) regulates public water systems that supply drinking water. The main components of the Safe Drinking Water Act are to:

1. Ensure that water from the tap is potable (safe for drinking, cooking, and hygiene)
2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community

3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 Code of Federal Regulations Section 144)
4. Regulate distribution systems

Title 40 of the Code of Federal Regulations

Title 40 of the Code of Federal Regulations, Part 258 (Resource Conservation and Recovery Act Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 set energy efficiency standards for lighting (specifically light bulbs) and appliances.

Energy Star Program

Energy Star is a voluntary labeling program introduced by USEPA to identify and promote energy-efficient products to reduce greenhouse gas emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes (Energy Star 2024).

Telecommunications Act

In 1996, the Federal Communications Commission (FCC) passed the Telecommunications Act, allowing any communications business to compete in any market against any other business. This act affects telephone service, cable programming, and other video services, including broadcast services and services provided to schools (FCC 2013).

b. State Regulations

Water and Wastewater

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by DWR.

Urban Water Management Planning Act

In 1983 the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its

various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an urban water management plan (UWMP) at least once every five years and submit them to the DWR. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24, commencing with Section 78500, or Division 26, commencing with Section 79000, or receive drought assistance from the state until the UWMP is submitted and deemed complete pursuant to the Urban Water Management Planning Act.

As discussed in Section 4.16.1(a), Pacific Grove is located within Cal-Am's Monterey Service Area of its Central Division; this area is also referred to as Cal-Am's Monterey Main. Cal-Am's 2020 UWMP for its Central Division-Monterey County District covers the Monterey Main area and includes water demand and supply availability projections for Pacific Grove as well as other incorporated and unincorporated areas of Monterey County. Population projections informing supply availability projections in the 2020 UWMP are based upon the existing General Plan and Zoning Code for jurisdictions within the service area, including Pacific Grove. These projections would be revised following approval of the proposed project. As such, water demands associated with development under the proposed project are not specifically accounted for in the 2020 UWMP, and are therefore detailed in the analysis provided under Impact UTIL-2, in Section 4.16.3. In accordance with the Urban Water Management Planning Act, Cal-Am's UWMP will be updated in 2025, with final 2025 UWMPs due to the DWR by July 1, 2026.

Cal-Am's UWMP includes a WSCP as Appendix I. The WSCP specifies demand reduction actions for customers as well as for the utility that are implemented for various stages of supply shortage defined by Stage 1 through Stage 4 (Cal-Am 2021b: 8, 9). As a public utility, Cal-Am does not have the authority to declare a water shortage emergency; rather, Cal-Am advises the CPUC of a water shortage emergency, then the MPWMD implements the appropriate stage and enforcement action from the WSCP (Cal-Am 2021b: 14). A wide variety of enforcement actions are detailed in the WSCP, as summarized below.

- **WSCP Stage 1.** Stage 1 actions include but are not limited to repairing leaks and breaks in facilities, prohibiting use of potable water for washing hard surfaces, limiting landscape irrigation to specific times or days, restricting watering for decorative features and vehicle washing, and prohibiting the use of potable water for construction and dust suppression (Cal-Am 2021b: 4).
- **WSCP Stage 2.** Stage 2 actions are triggered by a supply shortfall of up to 10 percent and require demand reduction measures in addition to those under Stage 1 (baseline), equivalent to the size of the anticipated shortfall (Cal-Am 2021b: 4, 7).
- **WSCP Stage 3.** Stage 3 actions are triggered by a supply shortfall of 10 to 30 percent and include Conservation Rates with surcharges to reduce demands, in addition to all reduction measures implemented under baseline (Stage 1) and up to 10 percent shortfall (Stage 2) conditions. Any implementation or modification of drought rate structures or surcharges is subject to approval of the CPUC and implementation by the MPWMD.
- **WSCP Stage 4.** Stage 4 shortfall conditions are triggered by a supply shortfall of 40 to greater than 50 percent, and require a moratorium on new connections or net zero demand increase. This would temporarily limit or ban new water service connections in the Monterey Main service area, subject to CPUC approval of MPWMD implementation (Cal-Am 2021b: 9).

The applicability of WSCP enforcement actions is discussed under Impact UTIL-2 for hydrologic conditions including normal water years, single-dry years, and multiple dry years.

Title 22 of California Code of Regulations

Among other things, Title 22 of the California Code of Regulations (Title 22) regulates public water systems and provides the authority for the SWRCB's Division of Drinking water to issue permits to public water systems. The City operates a public water system under permit number CA4910014. As required by its permit the City regularly monitors the quality of water it delivers and distributes annual consumer confidence reports to customers.

Title 24 of California Code of Regulations

CCR Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2022 Title 24 standards. The California Building Code is updated every three years and will undergo an updated edition in 2025; however, these new standards have not yet been codified at the time of this report. The California Building Standards Code's standards related to utilities and service systems are outlined below.

PART 5 – CALIFORNIA PLUMBING CODE

The California Plumbing Code is codified in Title 24, California Code of Regulations, Part 5. The Plumbing Code contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low flow fixtures and toilets. Existing development is also required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (Senate Bill [SB] 407 [2009] Civil Code Sections 1101.1 et seq.).

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The 2022 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers (Tiers I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

Regarding water conservation and stormwater drainage, the mandatory standards include requirements for a 20 percent reduction in indoor water use relative to specified baseline levels, the use of water-efficient irrigation systems for new development with an aggregate landscape area equal or greater than 500 square feet, and other indoor and outdoor water efficiency and conservation measures such as separate water submeters for subsystems and specific fixtures and fittings. The voluntary standards include stricter water conservation requirements for specific fixtures as well as 20 percent permeable paving for the Tier 1 standards and 30 percent permeable paving for the Tier II standards.

Electricity and Natural Gas

California Energy Commission

As the state's primary energy policy and planning agency, the CEC collaborates with state and federal agencies, utilities, and other stakeholders to develop and implement state energy policies. Since 1975, the CEC has been responsible for reducing the state's electricity and natural gas demand, primarily by adopting new Building and Appliance Energy Efficiency Standards that have contributed to keeping California's per capita electricity consumption relatively low. The CEC is also responsible for the certification and compliance of thermal power plants 50 megawatts and larger, including all project-related facilities in California (CEC 2025c).

California Public Utilities Commission

CPUC regulates investor-owned electric and natural gas utilities operating in California. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous state legislative enactments and various Federal statutory and administrative requirements. CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from PG&E and other natural gas utilities across California (CPUC 2025b).

Senate Bill 350

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires a doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Solid Waste

California Department of Resources Recycling and Recovery

CalRecycle oversees, manages, and monitors waste generated in California. CalRecycle provides limited grants and loans to help California cities, counties, businesses, and organizations meet the state waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites, including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including Assembly Bill (AB) 939 and SB 1016, both of which are described below.

Assembly Bill 939

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.

Senate Bill 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion

requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. The Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Assembly Bill 341

The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. AB 341 required all businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units to recycle by July 1, 2012. AB 341 also sets a statewide goal of 75 percent waste diversion.

Senate Bill 1383

SB 1383, which was passed in 2016, requires 75 percent organic waste diversion be achieved by 2025. The intent of SB 1383 is to reduce short-lived climate pollutants that are released by organic waste when such waste decomposes in landfills instead of being recycled into green products, such as compost.

c. Regional and Local Regulations

Monterey Regional Stormwater Management Program's Stormwater Technical Guide for Low Impact Development

The Monterey Regional Stormwater Management Program's Stormwater Technical Guide for Low Impact Development (LID) provides comprehensive guidelines to ensure compliance with Post-Construction Requirements for stormwater management. The guide emphasizes the use of LID techniques, which aim to mimic natural hydrology by detaining, retaining, and treating runoff on-site. Projects that create or replace 2,500 square feet or more of impervious area must adhere to these post-construction requirements, which include measures to control pollutant sources and manage runoff effectively. Additionally, the guide outlines Best Management Practices for municipalities to prevent stormwater pollution, such as maintaining streets, storm drains, and municipal buildings, inspecting businesses and construction sites, and educating the public. Designed to facilitate the review of applications and promote integrated LID design, the guide interprets, clarifies, and adds to the post-construction requirements to ensure effective stormwater management.

City of Pacific Grove Local Coastal Program

On March 11, 2020, the California Coastal Commission certified the City's adopted Local Coastal Program. Pacific Grove's Coastal Zone is comprised of approximately 458 acres of land and also extends offshore three nautical miles from the mean high tide line. With minor exceptions, development within that zone requires issuance of a Coastal Development Permit. Development includes activities such as the construction of buildings, divisions of land, and some uses of land that change the intensity of use or public access to coastal waters. Section 3.4 of the Local Coastal Program contains background information and policies addressing water supply, conservation, and wastewater treatment. These policies are intended to ensure that development within the Coastal Zone can be served by a long-term sustainable water supply, conserve as much water as possible, and limit or eliminate discharges that would affect coastal waters. Specifically, the following policies are applicable to utilities and service systems:

- **Policy INF-2.** Development shall only be approved if it is first clearly demonstrated that the development will be served by an adequate existing water allocation and sustainable long-term water supply. Individual private water systems, except for rainwater collection are prohibited.
- **Policy INF-4.** Wastewater disposal systems which minimize or eliminate marine resource pollution, and which provide for reclamation of wastewater for reuse, shall be encouraged.
- **Policy INF-5.** Development shall only be approved if it is first clearly demonstrated that the additional wastewater discharge associated with such development will not significantly adversely impact coastal resources, including marine resources. New development, including redeveloped structures, shall connect to the public wastewater treatment system.
- **Policy INF-8.** The City will maximize potential sources of new water by utilizing, where feasible, reclaimed wastewater and captured runoff for open-space irrigation. Development approval shall, as appropriate, include dual piping systems designed to allow for use of reclaimed water for irrigation and toilets in the future.
- **Policy INF-9.** New or expanded water or wastewater facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the Land Use Plan.

Pacific Grove General Plan

The City of Pacific Grove General Plan Public Facilities Element includes the following goals, objectives, and policies applicable to utilities and service systems:

Goal 1. Maintain an adequate level of service in the City's water system to meet the needs of the existing and future development.

- **Policy 2.** Prioritize available water allocation to best serve the City's needs, and to accommodate coastal priority uses designated in the Local Coastal Program Land Use Plan.
- **Policy 3.** Ensure the provision of adequate fire flow rates in all new development and remodeling.

Goal 2. Maintain a level of service in the City's sewage collection and disposal system adequate to meet the needs of existing and future development**.**

- **Policy 7.** Require the provisions of adequate sewer service to all new developments in the City.

Goal 4. Prevent property damage caused by flooding.

- **Policy 11.** Maintain an adequate level of service in the City's storm drainage system**.**
- **Policy 14.** Ensure that new development pays its fair share of the cost of drainage system improvements related to that development.

City of Pacific Grove Municipal Code

Chapter 9.16 – Solid Waste

Chapter 9.16 of the City of Pacific Grove Municipal Code focuses on garbage and refuse disposal within the city. It mandates that all property owners or occupants must obtain and maintain adequate solid waste collection services from the city's designated franchisee. The code specifies that solid waste containing organic material must be collected at least once per week, unless otherwise approved by the city manager. Collection times are restricted to between 6:00 a.m. and 6:00 p.m., Monday through Friday. Additionally, residential waste containers should be placed at the curb no earlier than 6:00 p.m. the day before collection and removed by 7:00 p.m. on the day of

collection. Commercial waste containers must be screened from public view except on the day of pickup and returned to their storage location within two hours of collection.

Section 18.21.010 – Utilities Undergrounding

Section 18.21.010 of the City of Pacific Grove Municipal Code states that all utilities must be placed underground for new construction, except for single-family dwellings in an R-1 zone. Additionally, if a property undergoes significant remodeling that requires the electrical system to be brought up to code, or if the use of the structure changes to something other than a single-family dwelling in an R-1 zone, the utilities must also be placed underground. However, equipment related to underground facilities, such as surface-mounted transformers, pedestal-mounted terminal boxes, meter cabinets, and concealed ducts, are exempt from these requirements.

4.16.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The project's impacts related to utilities and service systems are evaluated based on the project's adherence to local, state, and federal standards, and with consideration to the project's anticipated need for various utility services and facilities, in comparison to the capacity and condition of existing utilities and facilities. Evaluation of the proposed land uses and intensity of use was conducted to characterize utility requirements associated with buildout of the proposed project, including for water supply, wastewater treatment and disposal, stormwater management, natural gas, electricity, and telecommunications, as summarized below.

- **Water Supply.** Water demands for the project were calculated based upon water demand factors and per capita use rates from Cal-Am's 2020 UWMP. Project buildout was compared to land uses evaluated in the UWMP to identify water demands that were not accounted for in the UWMP. Data regarding water supply availability was sourced from Cal-Am's 2020 UWMP, data and information published by M1W and MPWMD, and other sources.
- **Wastewater.** The volume of wastewater that would be generated by development facilitated by the project was calculated based upon sewage generation factors applied to proposed land uses. For non-residential growth, wastewater was estimated using rates developed by USEPA. Remaining capacity of existing wastewater treatment facilities was evaluated based upon data from regulatory permits and facility information published online.
- **Stormwater.** Stormwater management needs of the project were evaluated by considering whether development facilitated by the project would introduce new impervious surfaces in areas where stormwater management is not currently present, such that the existing city-wide stormwater management system would need to be extended to serve project sites.
- **Natural Gas, Electricity, and Telecommunications.** Development facilitated by the project would connect to existing facilities providing natural gas, electricity, and telecommunications services throughout the project area. Potential need for new or upgraded utility connections was considered based on existing site-specific conditions and regulatory requirements for reliable service connections.

- **Solid Waste.** Development facilitated by the project would utilize existing solid waste infrastructure in the region. Potential need for new or upgraded solid waste facilities was considered based on remaining capacity for existing facilities and regulatory requirements for solid waste disposal.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on utilities and service systems if it would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects;
2. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments;
4. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or
5. Conflict with federal, state, and local management and reduction statutes and regulations related to solid waste.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project 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?
Threshold 3:	Would the project 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?

Impact UTIL-1 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD INCREASE DEMAND FOR UTILITY INFRASTRUCTURE; HOWEVER, NO SUBSTANTIAL RELOCATION OR CONSTRUCTION OF UTILITY SERVICES WOULD BE REQUIRED TO SERVICE DEVELOPMENT FACILITATED BY PROJECT BEYOND EXISTING CONDITIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Water

As detailed under Impact UTIL-2 below, the proposed project would introduce up to 4,950 new residents within Cal-Am's Monterey Main service area, with a total increased water demand of approximately 616 AFY to 669 AFY, based upon per capita water demand rates reflected in Cal-Am's 2020 UWMP (Cal-Am 2021a). Development facilitated by the project would generally occur in developed areas of Pacific Grove, which is served by existing water supply infrastructure and facilities operated and maintained by the MPWMD. Future projects could require new water service connections and site-specific infrastructure improvements such as pipeline extensions or replacements needed to connect to the existing distribution system and provide sufficient capacity.

Potential environmental impacts associated with developing new water supply connections would be evaluated and mitigated as necessary as part of the City's review of individual development applications for consistency with applicable policies of the Pacific Grove General Plan. As described in Section 2.6 of Chapter 2, *Project Description*, the proposed project would emphasize development in strategic areas of Pacific Grove located in proximity to existing water infrastructure that has been subject to previous disturbance. Accordingly, development facilitated by the project is anticipated to generally avoid undeveloped areas lacking water infrastructure and focus development in areas of Pacific Grove with existing water infrastructure. Additionally, water utility mains are often located beneath existing roadways, which are typically paved and do not contain sensitive environmental resources, such as wetlands and riparian habitat. Therefore, the proposed project would not result in the relocation or construction of water facilities and impacts would be less than significant. Water supply availability is discussed further under Impact UTIL-2, below.

Wastewater

Development facilitated by the project would generate wastewater that requires treatment before discharge or reuse. For example, the proposed project envisions development that would generate wastewater through the use of kitchens with sinks and bathrooms with toilets and showers.

As described within Section 4.16.1(b), the Regional Wastewater Treatment Plant has an average dry weather design treatment capacity of 29.6 million gallons per day and has a permitted peak wet weather design capacity of 75.6 million gallons per day. The diffuser outlet in Monterey Bay is designed to convey ultimate wet weather flows of 81.2 million gallons daily, which is the permitted rate of discharge through the outfall. The Regional Wastewater Treatment Plant treats an average of 18 million gallons per day with capacity of up to 29.6 million gallons per day (M1W 2025b). Additionally, peak wet weather flows were about 40 million gallons per day with capacity of up to 81.2 million gallons per day (M1W 2019). Thus, the Regional Wastewater Treatment Plant has an unused but permitted treatment capacity of approximately 11.6 million gallons per day[3] during dry weather and about 41.2 million gallons per day[4] during peak wet weather conditions.

As discussed under Section 2.7 of Chapter 2, *Project Description*, the project would facilitate the development of up to 2,335 new residential units and 292,578 commercial square feet, with an associated population increase of approximately 4,950 people. The estimate of additional wastewater that would be generated by residential development facilitated by the proposed project is based on sewage generation factors developed by the City of Los Angeles (City of Los Angeles 2006). Household sizes in Los Angeles are generally comparable to those in Pacific Grove. For example, the California Department of Finance reports an average household size of 2.12 people in Pacific Grove and 2.50 people in Los Angeles (California Department of Finance 2024). Using these numbers provides a more conservative estimate of wastewater generation, as the slightly larger household size in Los Angeles likely results in higher demand. For non-residential growth, wastewater is estimated using USEPA's wastewater estimate of 20 to 35 gallons per day per employee. USEPA applies this rate for both commercial and industrial uses, and while the estimate is presented as a range, for the purposes of this analysis, 35 gallons per day per employee is used in order to provide a conservative estimate of wastewater generation.

As shown in Table 4.16-1, using the unit loading criteria for residential and commercial uses, development facilitated by the proposed project would generate approximately 280,200 gallons per day (GPD) from residential development and 14,000 GPD of wastewater from commercial

[3] 11.6 million gallons per day = 29.6 million gallons per day capacity - 18 million gallons per day average.
[4] 40.2 million gallons per day = 81.2 million gallons per day capacity - 40 million gallons per day average.

development. The proposed project would result in approximately 294,200 GPD or approximately 0.35 million gallons per day (MGD), which would constitute approximately 3 percent of the Regional Wastewater Treatment Plant's remaining dry weather capacity of 11.6 MGD.[5] Additionally, the proposed project's increased wastewater flows would account for approximately 0.8 percent of the Regional Wastewater Treatment Plant's remaining wet weather capacity. Therefore, the Regional Wastewater Treatment Plant would have sufficient capacity to accommodate wastewater generated by the proposed project and the proposed project would be adequately served by existing wastewater treatment facilities.

Table 4.16-1 Estimated Wastewater Generation

Development Type	Estimated Buildout	Wastewater Generation Factor[2]	Projected Wastewater Generation (GPD)
Residential	2,335 units	120 GPD per unit	280,200
Commercial	400 employees[1]	35 GPD per employee	14,000
Total			**294,200**

GPD = gallons per day

1 Estimates provided in the Transportation Memorandum (Appendix E) assume that the project would facilitate the addition of 400 employees to the city.

2 City of Los Angeles 2006; United States Environmental Protection Agency 2025

Additionally, the California Plumbing Code contains provisions requiring the installation of low flow fixtures and toilets in new developments and the retrofitting of existing structures with water efficient fixtures. Development facilitated by the proposed project would be required to comply with Part 5, Chapter 4 of the California Plumbing Code which would reduce wastewater generation within the city. As described above, the Regional Wastewater Treatment Plant has capacity to meet the wastewater treatment demands that would be generated from development facilitated by the project. The expansion or construction of a new wastewater treatment facility to meet the demands of the proposed project would not be required. Impacts would be less than significant.

Stormwater

Development facilitated by the project would not require the construction of additional stormwater infrastructure because Pacific Grove is developed and equipped with an existing stormwater drainage system that serves the entirety of the city. Development facilitated by the project would introduce new impervious surfaces through the construction or reconstruction of paved areas; however, implementation of the LID site design measures in compliance with the Monterey Regional Stormwater Management Program's Stormwater Technical Guide for Low Impact Development would limit increases in runoff to storm drains (Monterey Stormwater Education Alliance2020). As discussed within Section 4.9, *Hydrology and Water Quality*, projects that create or replace 2,500 square feet or more of impervious area must adhere to post-construction requirements including measures to control pollutant sources and manage runoff effectively. Additionally, the Monterey Regional Stormwater Management Program's Stormwater Technical Guide for Low Impact Development outlines best management practices the City must adhere to in order to prevent stormwater pollution, such as maintaining streets, storm drains, and municipal buildings, and inspecting businesses and construction sites. Development facilitated by the project would also be required to demonstrate compliance with all applicable federal, state, and local regulations related to stormwater management. With compliance with existing regulations and LID

[5] 3 percent = 0.35 MGD (estimated project generation) divided by 11.6 MGD (remaining treatment capacity).

techniques, sufficient stormwater collection would be maintained. As such, new or expanded stormwater facilities are not anticipated to be required as a result of the proposed project. Therefore, the proposed project's impacts related to adequacy, capacity, and need for new stormwater infrastructure facilities resulting from stormwater generation would be less than significant.

Natural Gas, Electricity, and Telecommunications

Development facilitated by the project would occur on sites that are generally developed or surrounded by existing development, and are served by existing natural gas, electrical, and telecommunication (including cable television, landline services, internet, and cellular phone service) infrastructure. Development facilitated by the project would generally have access to utility infrastructure and would not require the installation of substantial natural gas, electrical, or telecommunication infrastructure to meet increased demands. However, individual development may require provision of new and upgraded utility infrastructure such as powerline or pipeline upgrades and new connections. In the event that new or upgraded utility infrastructure would be needed, it would be required to comply with Chapter 18.21 of the City of Pacific Grove Municipal Code Section 18.21.010, which states that all utilities must be placed underground for new construction, except for single-family dwellings in an R-1 zone. Additionally, if a property undergoes significant remodeling that requires the electrical system to be brought up to code, or if the use of the structure changes to something other than a single-family dwelling in an R-1 zone, the utilities must also be placed underground. Although development facilitated by the project may require new or expanded electric, natural gas, and telecommunications connections, environmental impacts would be reduced to the maximum extent feasible by existing regulations and the City's Municipal Code, resulting in a less-than-significant impact.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE DEMAND FOR WATER SUPPLY FROM CAL-AM'S MONTEREY MAIN SYSTEM. SUFFICIENT WATER SUPPLY WOULD BE AVAILABLE TO MEET ALL DEMANDS DURING NORMAL, SINGLE-DRY, AND MULTIPLE DRY YEAR CONDITIONS WITH OPERATION OF THE MONTEREY PENINSULA WATER SUPPLY PROJECT OCEAN DESALINATION PLANT, ANTICIPATED TO BE ONLINE IN 2030. TO ADDRESS ANY POTENTIAL SHORTFALLS THAT MAY OCCUR PRIOR TO OPERATION OF THE OCEAN DESALINATION PLANT, MITIGATION MEASURE UTIL-2 REQUIRES THAT CITY APPROVAL OF FUTURE DEVELOPMENT UNDER THE PROPOSED PROJECT WOULD BE CONTINGENT UPON PROJECT-SPECIFIC WATER SUPPLY VERIFICATION, ENSURING THAT PROJECTS WOULD NOT BE IMPLEMENTED WITHOUT SUFFICIENT AVAILABLE WATER SUPPLY. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

As discussed in Section 4.16.1(a), water supply in the project area is provided by Cal-Am's Monterey Main system, from a water supply portfolio consisting of the following sources:

- Carmel River aquifer (3,376 AFY)
- Seaside Groundwater Basin (774 AFY)
- ASR Program (920 AFY)

- PWM Project (3,500 AFY)
- Sand City Desalination Plant (94 AFY)
- MPWSP Ocean Desalination Plant (6,252 AFY after 2030)
- PWM Expansion Project (528 AFY in 2025, up to 2,250 AFY by 2040)

Water supply availability projections are provided in Cal-Am's 2020 UWMP for normal water year conditions, single-dry year conditions, and multiple dry year conditions. The population projections informing supply availability projections in Cal-Am's 2020 UWMP account for the existing General Plan and Zoning Code for Pacific Grove, which would be revised following approval of the proposed project during the next UWMP update. The proposed project would facilitate up to 4,950 new residents within Cal-Am's Monterey Main system service area, assuming that all development under the proposed project is populated by individuals relocating from outside the area; this is a conservative approach to the analysis, because future development would likely also be populated by individuals already residing within Cal-Am's Monterey Main service area. The water demands associated with these individuals were not accounted for in Cal-Am's 2020 UWMP and, at the time of preparation of this DEIR, the 2025 UWMP is not publicly available for review or reference. Therefore, the analysis provided herein relies on data from the 2020 UWMP and other published materials to consider whether Cal-Am's water supply portfolio for its Monterey Main system would be sufficient to meet the needs of all future development, including with 4,950 new residents, under normal year, single-dry year, and multiple dry year conditions.

Table 4.16-2, below, presents the total population and associated water demands within Cal-Am's Monterey Main service area under pre-project and post-project conditions. Pre-project conditions are those reflected in Cal-Am's 2020 UWMP. Post-project conditions are characterized as pre-project conditions plus 4,950 additional local residents, 400 additional employees, and 292,578 square feet of additional commercial uses in 2030, consistent with buildout of the proposed project in 2031. As described in the footnotes to Table 4.16-2, water demands for post-project conditions were calculated by multiplying the pre-project per capita water use rate (total water use divided by population) by the post-project population. This is an appropriate approach to estimating post-project water demands because the increased population under post-project conditions would not inherently increase the amount of water used per person. As new developments are constructed over time, they will be equipped with increasingly water-efficient plumbing fixtures and appliances pursuant to the California Green Building Standards Code, and per capita water use rates for residents of those developments will decrease over time. As future updates of the UWMP are prepared every five years, they will present updated development numbers and account for water use savings associated with increasing efficiencies. The projections below do not account for increasingly efficient water uses in future developments, and therefore likely over-estimate per capita water use rates over time, resulting in conservative assumptions for the purposes of this analysis.

Table 4.16-2 Projected Population and Water Demands Pre- and Post-Project

	2025[1]		2030		2035		2040		2045	
Metric	Pre-Project	Post-Project	Pre-Project	Post-Project	Pre-Project	Post-Project	Pre-Project	Post-Project	Pre-Project	Post-Project
Total population	93,577	93,577	95,437	100,387	97,297	102,247	99,157	104,107	101,017	105,967
Total demand (AFY)[2]	10,443	10,443	11,883	12,499	12,474	13,109	13,065	13,717	13,656	14,325
Per capita (AFY)[3]	0.11	0.11	0.12	0.12	0.13	0.13	0.13	0.13	0.14	0.14
Per capita (GPCD)	98	98	107	107	116	116	116	116	125	125

AFY = acre-feet per year; GPCD = gallons per capita per day

1. The "Pre-Project" column under each year presents projections from Cal-Am's 2020 UWMP on population and water demands for that respective year. The "Post-Project" column under each year shows the population and water demands adjusted to account for full buildout of development facilitated by the proposed project, including up to 4,950 new residents (based on the conservative assumption that all new residents would relocate to project developments from outside Cal-Am's Monterey Main service area).
2. Existing water demand is provided in Cal-Am's 2020 UWMP, Table 4-4 (Cal-Am 2021a: 4-8), which reflects regional growth projections from the Association of Monterey Bay Area Governments (AMBAG) as well as anticipated water needs that are independent of AMBAG projections, including for Pebble Beach Entitlements, tourism rebound, and legal Lots of Record. "With Project" water demand was calculated by multiplying the number of new individuals (4,950) by the pre-project per capita water demand rate for each projected year.
3. Per capita water demand is reflected as an average for Cal-Am's Monterey Main service area. It is shown in AFY per person, and was calculated by dividing total water demand by the total population for each respective year. As shown, the average per capita demand rate is projected to increase over time; although new developments are designed for higher efficiency in water use from updated appliances and increased density, the average per capita use rate still accounts for existing and aging development, based on projections from Cal-Am's 2020 UWMP, and increases in relation to population growth and associated overall water demands.

Source: Cal-Am 2021a: 4-6, 4-8

As shown in Table 4.16-2, water demands in 2025 would be the same as reflected in Cal-Am's 2020 UWMP because buildout of the proposed project would not have initiated yet. Total water demand for post-project conditions would then increase commensurate with increasing population beginning in 2030. As shown above, the per capita water use rate in 2025 was calculated as approximately 98 gallons per capita per day (GPCD) before the project, increasing to approximately 107 GPCD following buildout of the project in 2030. Table 4.16-3, below, highlights the increased water demands associated specifically with the population increase facilitated by the project.

Table 4.16-3 Proposed Project Water Demands

Quantity (AFY)	2025	2030	2035	2040	2045
Increase from project	0	616	635	652	669

AFY = acre-feet per year

Table 4.16-3 shows that full buildout of development facilitated by the proposed project would increase water demand in Cal-Am's Monterey Main system by approximately 616 AFY in 2030, increasing to approximately 669 AFY in 2045.

Cal-Am's targeted maximum use rate for the Monterey Main system in 2020 was 118 GPCD, which represented a 20 percent reduction from historic conditions, as required by SB X7-7. However, the actual per capita use rate in 2020 was approximately 89 GPCD (0.10 AFY) (Cal-Am 2021a, 5-2). As such, documented 2020 use rates were nearly 33 percent lower than Cal-Am's targeted maximum use rate for 2020. As described in the 2020 UWMP, the successful achievement of Cal-Am's 2020 per capita use target was due to the success of conservation measures implemented in response to drought conditions, as well as proactive education and outreach to service area residents, and compliance with mandated water use reductions from the State Water Resources Control Board (Cal-Am 2021a, 5-3). As shown in Table 4.16-2, projected per capita use rates are calculated to remain below Cal-Am's 2020 target of 118 GPCD through 2040, including under post-project conditions with the increased water uses shown in Table 4.16-3. This trend of maintaining reduced per capita water use rates is consistent with the continued implementation of the conservation, education, and outreach measures detailed in Cal-Am's WSCP, which is discussed in Section 4.16.1(a) under "Cal-Am Monterey Main Water Supply Sources," detailed in Section 4.16.2(b) under "Urban Water Management Planning Act," and considered in the impact analysis presented herein. This analysis assesses the water demands presented in Table 4.16-3 in comparison to the supply availability projections from Cal-Am's 2020 UWMP for normal year conditions, single dry years, and multiple (consecutive) dry years.

As discussed in Section 4.16.1(a), Cal-Am's water supply portfolio includes sources that are considered drought-proof and available under all hydrologic conditions, as well as sources that fluctuate in availability depending upon hydrologic conditions. Specifically, supply available from the ASR Program, the PWM Project, and the PWM Expansion Project vary depending upon hydrologic conditions, as described below.

- Source water for the ASR Program is limited to surplus flows from the Carmel River, such that diversions are contingent on maintaining minimum daily instream flows in the Carmel River and compliance with SWRCB Permit Nos. 20808A and 20808C; see Table 4.16-4.
- Source water for the PWM Project and PWM Expansion Project is treated wastewater from the M1W Regional Treatment Plant, which reduces in availability during dry year conditions because conservation conducted during dry years reduces overall water use and associated wastewater production. Beginning in 2030, the MPWSP Ocean Desalination Plant is anticipated to provide a drought-proof supply source for the PWM Project and PWM Expansion Project, supplementing the current supply source and improving reliability under all hydrologic conditions.

Table 4.16-4, below, provides an overview of Cal-Am's supply reliability by source for all sources except the PWM Project and the PWM Expansion Project, which are presented in Table 4.16-5 and Table 4.16-6, respectively, to reflect increasing reliability following the MPWSP Ocean Desalination Plant coming online in 2030 (Cal-Am 2024a, 2024b).

Table 4.16-4 Basis for Supply Reliability Planning – Water Year Data by Source

Supply Source	AFY[1]	Normal Year[2]	Single-Dry Year[2]	Multiple Dry Years[2] 1st year	2nd year	3rd year	4th year	5th year
Carmel River Aquifer	3,376	100%	100%	100%	100%	100%	100%	100%
Seaside Groundwater Basin[3]	774	100%	100%	100%	100%	100%	100%	100%
Sand City Desalination Plant	94	100%	100%	100%	100%	100%	100%	100%
ASR Program	920	100%	67%	67%	33%	0%	0%	0%
MPWSP Ocean Desalination[4]	6,252	100%	100%	100%	100%	100%	100%	100%

AFY = acre-feet per year; ASR = aquifer storage and recovery; MPWSP = Monterey Peninsula Water Supply Project

1. See Section 4.16.1(a) for discussion of source quantities and assumptions.
2. As reported in Cal-Am's 2020 UWMP (Cal-Am 2021a: 7-4), Normal Year conditions are based on 2004 hydrology, Single-Dry Year conditions are based on 2015 hydrology, and Multiple Dry Year conditions are based 2012-2016 hydrology. Each percentage reflects the portion of a supply source's total capacity that is anticipated to be available during respective water year types. As shown, with the exception of the ASR Program, all sources are anticipated to be available in full (100 percent) for all water year types, indicating these are "drought-proof" supply sources. The availability of ASR Program water decreases during dry years because the ASR Program relies on surplus flows from the Carmel River to recharge its storage. Surplus flows are reduced or unavailable during dry years, restricting inflow to the ASR Program and subsequently reducing the amount of supply available from this source. As shown, during a single-dry year, 67 percent of the ASR Program's full capacity will be available to Cal-Am, reducing to 33 percent during the second year of multiple dry years. By the third year of multiple dry years, no water supply is available from the ASR Program.
3. The Cal-Am Monterey Main system has a total entitled right of 1,474 AFY from the Seaside Groundwater Basin; however, in accordance with the basin's adjudication judgement, Cal-Am will reduce pumping by 700 AFY to 774 AFY for 25 years once a new supply source is operational, which is anticipated to occur in 2030 with operation of the MPWSP Ocean Desalination Plant. Cal-Am may pump up to 1,474 AFY until the MPWSP Ocean Desalination Plant is online in 2030. For the purposes of supply reliability planning, the reduced rate of 774 AFY is used for baseline conditions in 2030 and beyond.
4. The MPWSP Ocean Desalination Plant is anticipated to be operational by 2030 (Cal-Am 2024a, 2024b), and would produce a drought-proof water supply source that would be used to support the ASR program, the Pure Water Monterey (PWM) Project, and the PWM Expansion Project.

Source: Cal-Am 2021a: 7-4

Table 4.16-4 shows that the Carmel River Aquifer, Seaside Groundwater Basin, Sand City Desalination Plant, and the MPWSP Ocean Desalination Plant (once online) are "drought-proof" supply sources, as they are anticipated to be available in full during all hydrologic year types. The ASR Program depends upon surplus flow in the Carmel River and is therefore decreasingly available during dry year conditions. Table 4.16-5, below, presents supply reliability for the PWM Project.

Table 4.16-5 Basis for Supply Reliability Planning – PWM Project

Baseline Condition	2025	2030	2035	2040	2045
Contractual Supply (AFY)	3,500	3,500	3,500	3,500	3,500
Normal Year	100%	100%	100%	100%	100%
Single-Dry Year	80%	100%	100%	100%	100%
Multiple Dry Years: 1st year	80%	100%	100%	100%	100%
Multiple Dry Years: 2nd year	60%	100%	100%	100%	100%
Multiple Dry Years: 3rd year	40%	100%	100%	100%	100%
Multiple Dry Years: 4th year	20%	100%	100%	100%	100%
Multiple Dry Years: 5th year	0%	100%	100%	100%	100%

Source: Cal-Am 2021a: 7-5

Table 4.16-5 shows that the PWM Project will produce 100 percent of its contractual supply of 3,500 AFY under all hydrologic conditions after 2030, when the MPWSP Ocean Desalination Plant is anticipated to become operational and provide a drought-proof source of inflow for the PWM Project. Prior to 2030, reliability of the PWM Project is reduced during single dry-year and multiple dry year conditions, with no availability during the fifth year of multiple dry year conditions. Table 4.16-6, below, presents supply reliability for the PWM Expansion Project.

Table 4.16-6 Basis for Supply Reliability Planning – PWM Expansion Project

Baseline Condition	2025	2030	2035	2040	2045
Contractual Supply (AFY)	2,250	2,250	2,250	2,250	2,250
Normal Year	23%	100%	100%	100%	100%
Single-Dry Year	19%	84%	92%	100%	100%
Multiple Dry Years: 1st year	19%	84%	92%	100%	100%
Multiple Dry Years: 2nd year	14%	69%	85%	100%	100%
Multiple Dry Years: 3rd year	9%	53%	77%	100%	100%
Multiple Dry Years: 4th year	5%	38%	70%	100%	100%
Multiple Dry Years: 5th year	0%	22%	62%	100%	100%

Source: Cal-Am 2021a: 7-5

Table 4.16-6 shows that during normal years after 2030, when the MPWSP Ocean Desalination Plant is anticipated to come online (Cal-Am 2024a, 2024b), the PWM Expansion Project will produce 100 percent of its contractual supply of 2,250 AFY. Prior to 2030, water available from the PWM Expansion Project is limited to 23 percent of the total contractual amount under normal year conditions, with zero availability during the fifth year of multiple dry year conditions (Cal-Am 2021a: 7-4). Reliability of this supply source is anticipated to increase over time to 100 percent during all hydrologic year types after 2040.

Normal Water Year

Table 4.16-7 presents an overview of Cal-Am's projected water supply availability for normal year hydrologic conditions.

Table 4.16-7 Normal Year – Supply and Demand Comparison

Quantity (AFY)	2025	2030	2035	2040	2045
Total Water Demand	**10,443**	**11,883**	**12,474**	**13,065**	**13,656**
Water Supply without MPWSP Desalination	9,892	10,914	10,914	10,914	10,914
Carmel River Aquifer	3,376	3,376	3,376	3,376	3,376
Seaside Groundwater Basin	1,474	774	774	774	774
Sand City Desalination	94	94	94	94	94
ASR Program	920	920	920	920	920
PWM Project[1]	3,500	3,500	3,500	3,500	3,500
PWM Expansion Project[1]	528	2,250	2,250	2,250	2,250
Shortfall (without MPWSP Desalination)	*-551*	*-969*	*-1,560*	*-2,151*	*-2,742*
Shortfall (Percentage of Supply)	*-5%*	*-8%*	*-13%*	*-16%*	*-20%*
Additional Supply from MPWSP Desalination	0	6,252	6,252	6,252	6,252
Total Water Supply	**9,892**	**17,166**	**17,166**	**17,166**	**17,166**
Operational Buffer (10%)[2]	-989	-1,717	-1,717	-1,717	-1,717
Surplus/Shortfall without WSCP Action[3]	-1,540	3,566	2,975	2,384	1,793
WSCP Savings	1,540	0	0	0	0
Difference	**0**	**3,566**	**2,975**	**2,384**	**1,793**
Proposed Project Demand	*0*	*616*	*635*	*652*	*669*

AFY = acre-feet per year; MPWSP = Monterey Peninsula Water Supply Project; ASR = aquifer storage and recovery; PWM = Pure Water Monterey; WSCP = Water Shortage Contingency Plan

1. Under normal water year conditions, the PWM Project and PWM Expansion Project will be developed to their full capacities of 3,500 AFY and 2,250 AFY, respectively, without supplemental source water from the MPWSP Ocean Desalination Plant, which is anticipated to be operational in 2030 (Cal-Am 2024a, 20245b) to increase water production by these projects during hydrologic years when the availability of treated wastewater as a supply source is reduced due to the effectiveness of demand reduction actions.
2. A 10 percent operational buffer is subtracted from the total water supply for conservative planning purposes, providing a safety factor that accounts for production facility down-time due to maintenance or other reasons.
3. Cal-Am's WSCP includes demand reduction actions for various shortage stages implemented by Monterey Peninsula Water Management District with approval of the California Public Utilities Commission.

Source: Cal-Am 2021a: 7-6

Table 4.16-7 shows that under normal year conditions, there would be a supply shortfall of approximately five percent without the MPWSP Ocean Desalination Plant in 2025, increasing to approximately 20 percent in 2045. As discussed in Section 4.16.2, under "Urban Water Management Planning Act," Cal-Am's WSCP specifies demand reduction actions required for various stages of supply shortage defined by Stage 1 through Stage 4 (Cal-Am 2021b: 8, 9). Without the MPWSP Ocean Desalination Plant, Stages 1 and 2 (up to 10 percent shortfall) would occur in 2025 and 2030, requiring actions such as repairing leaks and restricting certain water uses, and Stage 3 (10-30 percent shortfall) would occur in 2035, 2040, and 2045, requiring Conservation Rates with surcharges to reduce demands, in addition to all Stage 1 and 2 actions.

Assuming the MPWSP Ocean Desalination Plant comes online as planned in 2030, surplus water supply would be available in quantities larger than the proposed project demand for all projected years during normal hydrologic conditions. As shown in Table 4.16-7, WSCP actions would be conducted to conserve 1,540 acre-feet of water and ensure supply availability for demands in 2025; WSCP demand reduction measures would not be necessary after 2025. If all development facilitated

by the proposed project is built out in 2030, it would introduce a collective water demand of approximately 616 AFY. Table 4.16-7 shows that with the MPWSP Ocean Desalination Plant operational in 2030, there would be a supply surplus greater than the project demands during each projected year. As discussed above, if the MPWSP Ocean Desalination Plant does not come online in 2030 as planned, continued WSCP demand reduction actions would be necessary to ensure sufficient supply availability within Cal-Am's Monterey Main service area.

In the event that the MPWSP Ocean Desalination Plant does not come online as planned in 2030, Mitigation Measure UTIL-2, *Water Supply Verification*, is required to ensure that sufficient water supply is demonstrated on a project-specific basis as part of the project approval process. Projects would not be implemented unless sufficient water supply availability is confirmed by Cal-Am and MPWMD. As discussed above, during normal year conditions without the MPWSP Ocean Desalination Plant, shortages could increase to approximately 20 percent in 2045, which is a WSCP Stage 3 shortage, requiring Conservation Rates and surcharges to reduce demands. All Stage 1 through Stage 3 actions would continue to apply during implementation of Mitigation Measure UTIL-2. Potential impacts related to water supply availability under normal water year conditions would be less than significant with mitigation.

Single Dry Year

Table 4.16-8, below, presents Cal-Am's projected water supply availability for single-dry year hydrologic conditions.

Table 4.16-8 Single Dry Year – Supply and Demand Comparison

Quantity (AFY)	2025	2030	2035	2040	2045
Total Water Demand	**10,443**	**11,883**	**12,474**	**13,065**	**13,656**
Water Supply without MPWSP Desalination[1]	8,783	8,083	8,083	8,083	8,083
Carmel River Aquifer	3,376	3,376	3,376	3,376	3,376
Seaside Groundwater Basin	1,474	774	774	774	774
Sand City Desalination	94	94	94	94	94
ASR Program	616	616	616	616	616
PWM Project	2,800	2,800	2,800	2,800	2,800
PWM Expansion Project	422	422	422	422	422
Shortfall (without MPWSP Desalination)	*-1,660*	*-3,800*	*-4,391*	*-4,982*	*-5,573*
Shortfall (Percentage of Supply)	*-16%*	*-32%*	*-35%*	*-38%*	*-41%*
Additional Supply from MPWSP Desalination[1]	0	8,430	8,609	8,780	8,780
MPWSP Ocean Desalination	0	6,252	6,252	6,252	6,252
PWM Project	0	700	700	700	700
PWM Expansion Project	0	1,478	1,657	1,828	1,828
Total Water Supply	**8,783**	**16,513**	**16,691**	**16,862**	**16,862**
Operational Buffer (10%)[2]	-878	-1,651	-1,669	-1,686	-1,686
Surplus/Shortfall without WSCP Action[3]	-2,539	2,979	2,548	2,111	1,520
WSCP Savings	2,539	0	0	0	0
Difference	**0**	**2,979**	**2,548**	**2,111**	**1,520**
Proposed Project Demand	*0*	*616*	*635*	*652*	*669*

AFY = acre-feet per year; ASR = aquifer storage and recovery; MPWSP = Monterey Peninsula Water Supply Project; PWM = Pure Water Monterey; WSCP = Water Shortage Contingency Plan

1. The MPWSP Ocean Desalination Plant is anticipated to come online in 2030, and it will create a new supply of up to 6,252 AFY as well as increase water produced by the PWM Project and PWM Expansion Project by supplementing their existing wastewater source flows with a drought-proof supply of source water, resulting in a total supply increase of up to 8,780 AFY by 2040.
2. For each year projected, a 10 percent operational buffer is subtracted from the total water supply for conservative planning purposes, providing a safety factor that accounts for production facility down-time due to maintenance or other reasons.
3. Cal-Am's WSCP includes demand reduction actions for various shortage stages implemented by Monterey Peninsula Water Management District with approval of the California Public Utilities Commission.

Source: Cal-Am 2021a: 7-7

Table 4.16-8 shows that under single-dry year conditions, there would be a supply shortfall of approximately 16 percent (WSCP Stage 3) in 2025 without the MPWSP Ocean Desalination Plant, increasing to approximately 41 percent (WSCP Stage 4) in 2045, if the desalination plant is not operational in 2030, as planned. As discussed in Section 4.16.2, under "Urban Water Management Planning Act," Stage 4 actions include all demand reduction actions from Stages 1 through 3, as well as prohibitions on new annexations (moratorium on new connections) or net zero demand increase requirements that would temporarily limit or ban new water service connections (Cal-Am 2021b: 9). During a Stage 4 shortage, Cal-Am and MPWMD may prohibit any new water service connections, unless the connection would not increase overall demands on the water system, such as projects that include their own, new water supply source. The moratorium would be removed when Cal-Am and MPWMD determine that Stage 4 shortage levels no longer exist, and new water connections may proceed without affecting the system's reliability.

If all development facilitated by the proposed project is built out in 2030, the associated water demand of 616 AFY would increase the anticipated supply shortfall by the same amount. Assuming the MPWSP Ocean Desalination Plant comes online as planned in 2030, surplus water supply would be available in quantities larger than the proposed project demand for all projected years during single-dry year hydrologic conditions. However, if the MPWSP Ocean Desalination Plant does not come online in 2030 as shown in Table 4.16-8, implementation of WSCP demand reduction actions would be necessary to ensure sufficient supply availability within Cal-Am's Monterey Main service area, including through a moratorium on new service connections during Stage 4 conditions, anticipated to occur in 2045.

In the event that the MPWSP Ocean Desalination Plant does not come online as planned in 2030, Mitigation Measure UTIL-2, *Water Supply Verification*, is required to ensure that projects are not implemented prior to verification of sufficient water supply availability. Projects would not be implemented unless sufficient water supply availability is confirmed by Cal-Am and MPWMD. All applicable WSCP shortage actions would continue to apply during implementation of Mitigation Measure UTIL-2. Potential impacts related to water supply availability under single-dry year conditions would be less than significant with mitigation.

Multiple Dry Years

This section presents a series of tables with water supply availability projections for each of five consecutive dry years within Cal-Am's Monterey Main service area.

Year 1 of five consecutive dry years is characterized by the same water demand and supply projections as presented above in Table 4.16-8, for single-dry year conditions.

Table 4.16-9, below, presents supply availability projections for Year 2 of five consecutive dry years in Cal-Am's Monterey Main service area.

Table 4.16-9 Multiple Dry Years – Supply and Demand Comparison, Year 2

Quantity (AFY)	2025	2030	2035	2040	2045
Total Water Demand	**10,443**	**11,883**	**12,474**	**13,065**	**13,656**
Water Supply without MPWSP Desalination	7,669	6,969	6,969	6,969	6,969
Carmel River Aquifer	3,376	3,376	3,376	3,376	3,376
Seaside Groundwater Basin	1,474	774	774	774	774
Sand City Desalination	94	94	94	94	94
Aquifer Storage and Recovery (ASR)[1]	308	308	308	308	308
Pure Water Monterey (PWM) Project[2]	2,100	2,100	2,100	2,100	2,100
PWM Expansion Project[2]	317	317	317	317	317
Shortfall without MPWSP Desalination	*-2,774*	*-4,914*	*-5,505*	*-6,096*	*-6,687*
Shortfall (Percentage of Supply)	*-27%*	*-41%*	*-44%*	*-47%*	*-49%*
Additional Supply from MPWSP Desalination[3]	0	8,886	9,243	9,585	9,585
MPWSP Ocean Desalination	0	6,252	6,252	6,252	6,252
PWM Project	0	1,400	1,400	1,400	1,400
PWM Expansion Project	0	1,234	1,591	1,933	1,933
Total Water Supply	**7,669**	**15,855**	**16,212**	**16,554**	**16,554**
Operational Buffer (10%)[4]	-767	-1,586	-1,621	-1,655	-1,655
Surplus/Shortfall without WSCP Action[5]	-3,541	2,387	2,117	1,834	1,234
WSCP Savings	3,541	0	0	0	0
Difference	**0**	**2,387**	**2,117**	**1,834**	**1,234**
Proposed Project Demand	*0*	*616*	*635*	*652*	*669*

AFY = acre-feet per year; ASR = aquifer storage and recovery; MPWSP = Monterey Peninsula Water Supply Project; PWM = Pure Water Monterey; WSCP = Water Shortage Contingency Plan

1. ASR Program water will provide 308 AFY during Year 2 compared to 616 AFY during Year 1 of multiple dry year conditions due to inflow being reliant on surplus flows in the Carmel River, which reduce as drought years persist.
2. PWM Project (full capacity 3,500 AFY) and PWM Expansion Project (full capacity 2,250 AFY) water availability decrease during dry year conditions as detailed in Table 4.16-5 and Table 4.16-6, respectively.
3. The MPWSP Ocean Desalination Plant is anticipated to come online in 2030, and it will create a new supply of up to 6,252 AFY as well as increase water produced by the PWM Project and PWM Expansion Project by supplementing their existing wastewater source flows with a drought-proof supply of source water. Water produced by the PWM Project and PWM Expansion Project will increase during each consecutive dry year until the projects' capacity of 3,500 AFY and 2,250 AFY, respectively, are reached.
4. For each year projected, a 10 percent operational buffer is subtracted from the total water supply for conservative planning purposes, providing a safety factor that accounts for production facility down-time due to maintenance or other reasons.
5. Cal-Am's WSCP includes demand reduction actions for various shortage stages implemented by Monterey Peninsula Water Management District with approval of the California Public Utilities Commission.

Source: Cal-Am 2021a: 7-8

Table 4.16-9 shows that during Year 2 of multiple dry year conditions, there would be a supply shortfall of approximately 27 percent (WSCP Stage 3) in 2025 without the MPWSP Ocean Desalination Plant, increasing to approximately 49 percent (WSCP State 4) in 2030 through 2045, if the desalination plant is not operational in 2030 as planned. As described above, Stage 4 actions include a moratorium on new service connections or net zero demand increase requirements.

If all development facilitated by the proposed project is built out in 2030, the associated water demand of 616 AFY would increase the anticipated supply shortfall by the same amount. Assuming the MPWSP Ocean Desalination Plant comes online as planned in 2030, sufficient supply would be available to meet all demands, including for the proposed project, during all following projections for Year 2 of multiple dry years. However, if the MPWSP Ocean Desalination Plant does not come

online in 2030 as shown in Table 4.16-9, implementation of WSCP demand reduction actions would be necessary to ensure sufficient supply availability within Cal-Am's Monterey Main service area. In the event that the MPWSP Ocean Desalination Plant to not come online as planned in 2030, Mitigation Measure UTIL-2, *Water Supply Verification*, is required to ensure that projects are not implemented prior to verification of sufficient water supply availability. Projects would not be implemented unless sufficient water supply availability is confirmed by Cal-Am and MPWMD. All applicable WSCP shortage actions would continue to apply during implementation of Mitigation Measure UTIL-2. Potential impacts related to water supply availability under Year 2 of multiple dry year conditions would be less than significant with mitigation.

Table 4.16-10, below, presents supply availability projections for Year 3 of five consecutive dry years in Cal-Am's Monterey Main service area.

Table 4.16-10 Multiple Dry Years – Supply and Demand Comparison, Year 3

Quantity (AFY)	2025	2030	2035	2040	2045
Total Water Demand	**10,443**	**11,883**	**12,474**	**13,065**	**13,656**
Water Supply without MPWSP Desalination	6,555	5,855	5,855	5,855	5,855
Carmel River Aquifer	3,376	3,376	3,376	3,376	3,376
Seaside Groundwater Basin	1,474	774	774	774	774
Sand City Desalination	94	94	94	94	94
ASR Program[1]	0	0	0	0	0
PWM Project[2]	1,400	1,400	1,400	1,400	1,400
PWM Expansion Project[2]	211	211	211	211	211
Shortfall without MPWSP Desalination	*-3,888*	*-6,028*	*-6,619*	*-7,210*	*-7,801*
Shortfall (Percentage of Supply)	*-37%*	*-51%*	*-53%*	*-55%*	*-57%*
Additional Supply from MPWSP Desalination[3]	0	9,342	9,878	10,391	10,391
MPWSP Ocean Desalination	0	6,252	6,252	6,252	6,252
PWM Project	0	2,100	2,100	2,100	2,100
PWM Expansion Project	0	990	1,526	2,039	2,039
Total Water Supply	**6,555**	**15,198**	**15,733**	**16,246**	**16,246**
Operational Buffer (10%)[5]	-656	-1,520	-1,573	-1,625	-1,625
Surplus/Shortfall without WSCP Action[6]	-4,543	1,795	1,686	1,556	965
WSCP Savings	4,543	0	0	0	0
Difference	**0**	**2,979**	**2,548**	**2,111**	**1,520**
Proposed Project Demand	*0*	*616*	*635*	*652*	*669*

AFY = acre-feet per year; ASR = aquifer storage and recovery; MPWSP = Monterey Peninsula Water Supply Project; PWM = Pure Water Monterey; WSCP = Water Shortage Contingency Plan

1. During the third year of multiple dry year conditions, there would be no surplus surface flows in the Carmel River and therefore no source flow available for the ASR Program.
2. PWM Project (full capacity 3,500 AFY) and PWM Expansion Project (full capacity 2,250 AFY) water availability decrease during consecutive multiple dry year conditions as detailed in Table 4.16-5 and Table 4.16-6, respectively.
3. The MPWSP Ocean Desalination Plant is anticipated to come online in 2030, and it will create a new supply of up to 6,252 AFY as well as increase water produced by the PWM Project and PWM Expansion Project by supplementing their existing wastewater source flows with a drought-proof supply of source water. Water produced by the PWM Project and PWM Expansion Project will increase during each consecutive dry year until the projects' capacity of 3,500 AFY and 2,250 AFY, respectively, are reached.
4. For each year projected, a 10 percent operational buffer is subtracted from the total water supply for conservative planning purposes, providing a safety factor that accounts for production facility down-time due to maintenance or other reasons.
5. Cal-Am's WSCP includes demand reduction actions for various shortage stages implemented by Monterey Peninsula Water Management District with approval of the California Public Utilities Commission.

Source: Cal-Am 2021a: 7-9

Table 4.16-10 shows that during Year 3 of multiple dry year conditions, there would be a supply shortfall of approximately 37 percent (WSCP Stage 3-4) in 2025 without the MPWSP Ocean Desalination Plant, increasing to approximately 57 percent (WSCP Stage 4) in 2045, if the desalination plant is not operational in 2030, as planned. As described above, Stage 4 actions include a moratorium on new service connections or net zero demand increase requirements.

If all development facilitated by the proposed project is built out in 2030, the associated water demand of 616 AFY would increase the anticipated supply shortfall by the same amount, and would continue to be addressed by WSCP Stage 4 consistent with pre-project conditions. Assuming the MPWSP Ocean Desalination Plant comes online as planned in 2030, sufficient supply would be available to meet all demands, including for the proposed project, during all following projections for Year 3 of multiple dry years. However, if the MPWSP Ocean Desalination Plant does not come online in 2030 as shown in Table 4.16-10, continued implementation of WSCP Stage 4 actions would be necessary to ensure sufficient supply availability within Cal-Am's Monterey Main service area. In the event that the MPWSP Ocean Desalination Plant to not come online as planned in 2030, Mitigation Measure UTIL-2, *Water Supply Verification*, is required to ensure that projects are not implemented without verification of sufficient water supply. Potential impacts related to water supply availability during Year 3 of multiple dry years would be less than significant with mitigation.

Table 4.16-11, below, presents supply availability projections for Year 4 of five consecutive dry years in Cal-Am's Monterey Main service area.

Table 4.16-11 Multiple Dry Years – Supply and Demand Comparison, Year 4

Quantity (AFY)	2025	2030	2035	2040	2045
Total Water Demand	**10,443**	**11,883**	**12,474**	**13,065**	**13,656**
Water Supply without MPWSP Desalination	5,750	5,050	5,050	5,050	5,050
Carmel River Aquifer	3,376	3,376	3,376	3,376	3,376
Seaside Groundwater Basin	1,474	774	774	774	774
Sand City Desalination	94	94	94	94	94
ASR Program[1]	0	0	0	0	0
PWM Project[2]	700	700	700	700	700
PWM Expansion Project[2]	106	106	106	106	106
Shortfall (without MPWSP Desalination)	*-4,693*	*-6,833*	*-7,424*	*-8,015*	*-8,606*
Shortfall (Percentage of Supply)	*-45%*	*-58%*	*-60%*	*-61%*	*-63%*
Additional Supply from MPWSP Desalination[3]	0	9,798	10,512	11,196	11,196
MPWSP Ocean Desalination	0	6,252	6,252	6,252	6,252
PWM Project	0	2,800	2,800	2,800	2,800
PWM Expansion Project	0	746	1,460	2,144	2,144
Total Water Supply	**5,750**	**14,848**	**15,562**	**16,246**	**16,246**
Operational Buffer (10%)[4]	-575	-1,485	-1,556	-1,625	-1,625
Surplus/Shortfall without WSCP Action[5]	-5,268	1,480	1,532	1,556	965
WSCP Savings	5,268	0	0	0	0
Difference	**0**	**1,480**	**1,532**	**1,556**	**965**
Proposed Project Demand	*0*	*616*	*635*	*652*	*669*

AFY = acre-feet per year; ASR = aquifer storage and recovery; MPWSP = Monterey Peninsula Water Supply Project; PWM = Pure Water Monterey; WSCP = Water Shortage Contingency Plan

1. During the fourth year of multiple dry year conditions, there would be no surplus surface flows in the Carmel River and therefore no source flow available for the ASR Program.
2. PWM Project (full capacity 3,500 AFY) and PWM Expansion Project (full capacity 2,250 AFY) water availability decrease during consecutive multiple dry year conditions as detailed in Table 4.16-5 and Table 4.16-6, respectively.
3. The MPWSP Ocean Desalination Plant is anticipated to come online in 2030, and it will create a new supply of up to 6,252 AFY as well as increase water produced by the PWM Project and PWM Expansion Project by supplementing their existing wastewater source flows with a drought-proof supply of source water. Water produced by the PWM Project and PWM Expansion Project will increase during each year of consecutive dry years until the projects' cumulative capacity of 3,500 AFY and 2,250 AFY, respectively, are reached.
4. For each year projected, a 10 percent operational buffer is subtracted from the total water supply for conservative planning purposes, providing a safety factor that accounts for production facility down-time due to maintenance or other reasons.
5. Cal-Am's WSCP includes demand reduction actions for various shortage stages implemented by Monterey Peninsula Water Management District with approval of the California Public Utilities Commission.

Source: Cal-Am 2021a: 7-9

Table 4.16-11 shows that during Year 4 of multiple dry year conditions, there would be a supply shortfall of approximately 45 percent (WSCP State 4) in 2025 without the MPWSP Ocean Desalination Plant, increasing to approximately 63 percent (WSCP Stage 4) in 2045, if the desalination plant is not online in 2030 as planned. As described above, Stage 4 actions include a moratorium on new service connections or net zero demand increase requirements.

If all development facilitated by the proposed project is built out in 2030, the associated water demand of 616 AFY would increase the anticipated supply shortfall by the same amount, and would continue to be addressed by WSCP Stage 4 consistent with pre-project conditions. Assuming the MPWSP Ocean Desalination Plant comes online as planned in 2030, sufficient supply would be available to meet all demands, including for the proposed project, during all following projections

for Year 4 of multiple dry years. However, if the MPWSP Ocean Desalination Plant does not come online in 2030 as shown in Table 4.16-11, continued implementation of WSCP Stage 4 actions would be necessary to ensure sufficient supply availability within Cal-Am's Monterey Main service area. In the event that the MPWSP Ocean Desalination Plant to not come online as planned in 2030, Mitigation Measure UTIL-2, *Water Supply Verification*, is required to ensure that projects are not implemented prior to verification of sufficient water supply availability. All applicable WSCP shortage actions would continue to apply during implementation of Mitigation Measure UTIL-2. Potential impacts related to water supply availability under Year 4 of multiple dry year conditions would be less than significant with mitigation.

Table 4.16-12, below, presents supply availability projections for the fifth year of five consecutive dry years in Cal-Am's Monterey Main service area.

Table 4.16-12 Multiple Dry Years – Supply and Demand Comparison, Year 5

Quantity (AFY)	2025	2030	2035	2040	2045
Total Water Demand	**10,443**	**11,883**	**12,474**	**13,065**	**13,656**
Water Supply without MPWSP Desalination	4,944	4,244	4,244	4,244	4,244
Carmel River Aquifer	3,376	3,376	3,376	3,376	3,376
Seaside Groundwater Basin	1,474	774	774	774	774
Sand City Desalination	94	94	94	94	94
ASR Program[1]	0	0	0	0	0
PWM Project[2]	0	0	0	0	0
PWM Expansion Project[2]	0	0	0	0	0
Shortfall (without MPWSP Desalination)	*-5,499*	*-7,639*	*-8,230*	*-8,821*	*-9,412*
Shortfall (Percentage of Supply)	*-53%*	*-64%*	*-66%*	*-68%*	*-69%*
Additional Supply from MPWSP Desalination[3]	0	10,255	11,147	12,002	12,002
MPWSP Ocean Desalination	0	6,252	6,252	6,252	6,252
PWM Project	0	3,500	3,500	3,500	3,500
PWM Expansion Project	0	503	1,395	2,250	2,250
Total Water Supply	**4,944**	**14,499**	**15,391**	**16,246**	**16,246**
Operational Buffer (10%)[4]	-494	-1,450	-1,539	-1,625	-1,925
Surplus/Shortfall without WSCP Action[5]	-5,993	1,166	1,378	1,556	965
WSCP Savings	5,993	0	0	0	0
Difference	**0**	**1,166**	**1,378**	**1,556**	**965**
Proposed Project Demand	*0*	*616*	*635*	*652*	*669*

AFY = acre-feet per year; ASR = aquifer storage and recovery; MPWSP = Monterey Peninsula Water Supply Project; PWM = Pure Water Monterey; WSCP = Water Shortage Contingency Plan

1. *During the fifth year of multiple dry year conditions, there would be no surplus surface flows in the Carmel River and therefore no source flow available for the ASR Program.*
2. *PWM Project (full capacity 3,500 AFY) and PWM Expansion Project (full capacity 2,250 AFY) water availability decrease during consecutive dry years as detailed in* Table 4.16-5 and Table 4.16-6*, respectively; during Year 5 of multiple dry year conditions, no water would be produced by these projects without supplemental source water from the MPWSP Ocean Desalination Plant.*
3. *The MPWSP Ocean Desalination Plant is anticipated to come online in 2030, and it will create a new supply of up to 6,252 AFY as well as increase water produced by the PWM Project and PWM Expansion Project by supplementing their existing wastewater source flows with a drought-proof supply of source water. Water produced by the PWM Project and PWM Expansion Project will increase during each consecutive dry year until the projects' capacity of 3,500 AFY and 2,250 AFY, respectively, are reached.*
4. *For each year projected, a 10 percent operational buffer is subtracted from the total water supply for conservative planning purposes, providing a safety factor that accounts for production facility down-time due to maintenance or other reasons.*
5. *Cal-Am's WSCP includes demand reduction actions for various shortage stages implemented by Monterey Peninsula Water Management District with approval of the California Public Utilities Commission.*

Source: Cal-Am 2021a: 7-10

Table 4.16-12 shows that during Year 5 of multiple dry year conditions, there would be a supply shortfall of approximately 53 percent (WSCP State 4) in 2025 without the MPWSP Ocean Desalination Plant, increasing to approximately 69 percent (WSCP Stage 4) in 2045, if the desalination plant is not online in 2030, as planned. As described above, Stage 4 actions include a moratorium on new service connections or net zero demand increase requirements.

If all development facilitated by the proposed project is built out in 2030, the associated water demand of 616 AFY would increase the anticipated supply shortfall by the same amount. Assuming the MPWSP Ocean Desalination Plant comes online as planned in 2030, sufficient supply would be available to meet all demands, including for the proposed project, during all following projections for Year 5 of multiple dry years. However, if the MPWSP Ocean Desalination Plant does not come online in 2030 as shown in Table 4.16-12, continued implementation of WSCP Stage 4 actions would be necessary to ensure sufficient supply availability within Cal-Am's Monterey Main service area. In the event that the MPWSP Ocean Desalination Plant to not come online as planned in 2030, Mitigation Measure UTIL-2, *Water Supply Verification*, is required to ensure that projects are not implemented prior to verification of sufficient water supply availability. All applicable WSCP shortage actions would continue to apply during implementation of Mitigation Measure UTIL-2. Potential impacts related to water supply availability under Year 5 of multiple dry year conditions would be less than significant with mitigation.

Conclusion

The analysis provided above demonstrates that supply shortage conditions are anticipated to occur within Cal-Am's Monterey Main system, and would be present under both pre-project and post-project conditions. As with existing practice, water shortages would be addressed through implementation of Cal-Am's WSCP, which prohibits new water connections under the most severe drought restrictions. The proposed project would facilitate development accommodating up to 4,950 new residents within Cal-Am's Monterey Main service area, with buildout of identified housing sites, upzoning areas, and additional parcels anticipated to occur after 2030, when the MPWSP Ocean Desalination Plant is anticipated to be online. The data presented herein demonstrates that with operation of the MPWSP Ocean Desalination Plant, there would be surplus water supply availability in the Monterey Main system sufficient to accommodate all existing and proposed water demands, including for the proposed project. However, should the MPWSP Ocean Desalination Plant fail to be constructed and operational by 2030, a shortfall would occur and sufficient water supplies would not be available to serve the project and reasonably foreseeable future development. To ensure that sufficient water supply is available for proposed project development if the MPWSP Ocean Desalination Plant does not come online in 2030 as planned, Mitigation Measure UTIL-2, *Water Supply Verification*, is required. Potential impacts related to water supply availability would be less than significant with mitigation.

Mitigation Measures

UTIL-2 Water Supply Verification

Sufficient water supply availability must be verified for all projects under the City of Pacific Grove Housing Element Update, Zoning Ordinance Amendments, and General Plan Amendments. The City shall not issue any building permits for development projects requiring potable water until a Residential Water Release Form & Water Permit Application has been issued by the Monterey Peninsula Water Management District (MPWMD) confirming sufficient water supply is available for the project. Project applicants shall submit a detailed accounting of all project water demands to

MPWMD, for consideration in issuing a Residential Water Release Form & Water Permit Application. Projects meeting the definition of a "Project" under California Water Code (CWC) Section 10912 must be evaluated in a Water Supply Assessment (WSA) in accordance with CWC Section 10910(f), subject to review and approval by MPWMD. Projects that are not subject to CWC Section 10912 must be evaluated in a Residential Water Release Form & Water Permit Application, subject to review and approval by MPWMD. Residential Water Release Form & Water Permit Applications issued by MPWMD shall be informed by project-specific demand information provided in the respective WSA or Residential Water Release Form & Water Permit Application. The Residential Water Release Form & Water Permit Application shall identify whether the proposed project requires additional water credits to meet project demands, in addition to any existing water credits that may be associated with the project site(s).

Significance After Mitigation

Implementing Mitigation Measure UTIL-2 would ensure that development under the proposed project would not be approved and constructed/operated without verification of sufficient water supply availability. Under Mitigation Measure UTIL-2, the water demands associated with construction and operation of all proposed projects would be evaluated in either a WSA or Residential Water Release Form & Water Permit Application, subject to review and approval by MPWMD, which would issue a Residential Water Release Form & Water Permit Application detailing the sufficiency of existing water credits to support project demands. The City would not approve projects unless sufficient water supply availability is verified for each respective project.

In addition, as discussed above and under "Conclusions," if the MPWSP Ocean Desalination Plant is completed as planned, with operation anticipated in 2030, there would be surplus water supply availability in the Monterey Main system sufficient to accommodate all existing and proposed water demands, including for the proposed project, under all water year types including multiple dry years. In the event that the MPWSP Ocean Desalination Plant is delayed or otherwise does not come online as planned, Mitigation Measure UTIL-2 would ensure that development under the proposed project would not proceed until and unless sufficient water supply is available. As such, Mitigation Measure UTIL-2 sufficiently avoids the potential for water supply availability to result in adverse impacts by ensuring that sufficient water is demonstrated to be available for a given development proposal prior to approval. Therefore, potential impacts associated with water supply availability would be less than significant with mitigation.

Threshold 4:	Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
Threshold 5:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE AMOUNT OF SOLID WASTE THAT IS TRANSPORTED TO AND DISPOSED OF AT THE MONTEREY PENINSULA LANDFILL. THIS SOLID WASTE WOULD NOT EXCEED STATE OR LOCAL STANDARDS OR THE CAPACITY OF LOCAL INFRASTRUCTURE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction facilitated by the project would involve the new construction or redevelopment of buildings and landscaping. This would result in the generation of solid waste from demolition and on-site construction activities. Development facilitated by the project that would entail construction

and generate solid waste would subject to Pacific Grove Municipal Code Chapter 9.16 to ensure that construction-generated solid waste is not in excess of state or local standards or the capacity of local landfills or otherwise impair the attainment of solid waste reduction goals. Therefore, construction impacts related to landfill capacity and solid waste reduction goals consistency would be less than significant.

Development facilitated by the project could result in the addition of up to 2,335 new residential units and approximately 400 employees throughout Pacific Grove. Based on CalRecycle's solid waste generation rate of 5.31 pounds per dwelling unit per day and 10.53 pounds per employee per day, development facilitated by the project would generate an estimated 16,611 pounds per day of solid waste (CalRecycle 2019).[6] This would equate to approximately 6.1 million pounds per year, or 3,031 tons per year.

According to CalRecycle, the Monterey Peninsula Landfill has a maximum throughput of approximately 3,500 tons per day and anticipated closure date of February 28, 2107. Development facilitated by the project would generate approximately 8.3 tons of solid waste per day[7], which would account for approximately 0.2 percent[8] of the maximum daily throughput of the Monterey Peninsula Landfill. Furthermore, the 8.3 tons of solid waste per day generated by the project would account for approximately 0.006 percent[9] annually of the Monterey Peninsula Landfill's remaining capacity of 48,560,000 cubic yards. Therefore, the Monterey Peninsula Landfill has sufficient remaining capacity to accommodate the solid waste disposal needs that would be anticipated from the growth under the proposed project.

Development facilitated by the project would be required to comply with existing solid waste statues and regulations, including paying a fair share for solid waste services and achieving diversion rates consistent with AB 939. Pursuant to AB 939, the City must divert 50 percent of solid waste from landfills. Development facilitated by the project would also be required to demonstrate compliance with all applicable federal, state, and local regulations related to management and reduction of solid waste, including related to recycling and composting (e.g., California Senate Bill 1383). Therefore, impacts related to local solid waste infrastructure capacity and solid waste management and reduction regulations consistency would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.16.4 Cumulative Impacts

The geographic scope of the cumulative utilities and service systems analysis includes the Cal-Am, M1W, Pacific Grove Public Works, and GreenWaste service areas. This geographic scope is appropriate because public services and utilities are provided on a local or regional level, and recreational facilities are used locally or regionally. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Pacific Grove, Monterey, and the Del Monte Forest.

[6] 16,611 pounds per day = (10.53 lbs per employee/day * 400 employees) + (5.31 lbs per unit/day * 2,335 units)
[7] 8.3 tons per day = 16,611 pounds per day/2000
[8] 0.2 percent = 8.3 tons per day / 3500 tons per day maximum permitted daily capacity
[9] 0.006 percent = (8.3 tons per day * 365) / 48,560,000 cubic yards

Water Supply

The implementation of cumulative development would include the construction of new water supply facilities, particularly in the form of site-specific service connections and conveyance pipes. Potential environmental impacts associated with developing new water supply connections would be evaluated and mitigated as necessary as part of the lead agency's review of individual development applications for consistency with applicable General Plan policies and Municipal Code requirements, and potential cumulative impacts related to new or expanded water supply infrastructure (Threshold 1) would be less than significant, as infrastructure needed for water supply would be site-specific and mitigated on a project-specific basis, thereby avoiding the potential for impacts to combine with similar impacts of other projects.

Cumulative development would increase the number of residential units and square footage of non-residential uses in the project area and would introduce associated water demands. Cumulative development would be required to be consistent with existing General Plan and Zoning Code requirements and are therefore considered accounted for in Cal-Am's 2020 UWMP, which relies on local growth projections to inform calculations of water demands and supply availability. Cal-Am's 2020 UWMP identified water shortage conditions under single-dry and multiple dry year conditions prior to operation of the MPWSP Ocean Desalination Project, which is anticipated to occur in 2030. WSCP Stage 4 water shortage conditions are projected to occur during consecutive years of multiple dry year conditions, and response measures may include restrictions or prohibitions on new water service connections. As a result, cumulative projects proposed for implementation during WSCP Stage 4 conditions may be delayed until water shortage conditions improve, and new service connections can be provided. These restrictions ensure the available water supply will be sufficient to meet demands during a water shortage condition.

Ongoing water shortage conditions would be alleviated by the MPWSP Ocean Desalination Plant, when it comes online (anticipated in 2030) and fulfills the drought-proof water supply source designed to be provided to the Monterey Main system by the MPWSP. If cumulative development is proposed during a WSCP Stage 4 water shortage condition and/or prior to the MPWSP Ocean Desalination Plant coming online, the increased water demands could cause cumulative impacts associated with water supply availability and reliability (Threshold 2) to be potentially significant and unavoidable due to a lack of sufficient supply during Stage 4 conditions and during certain dry year conditions prior to operation of the MPWSP Ocean Desalination Plant. However, should cumulative projects be proposed during a Stage 4 shortage, they would be subject to the same moratorium on new connections as currently applies throughout Cal-Am's Monterey Main service area during a Stage 4 condition, and therefore would not be approved unless and until the Stage 4 condition is lifted. Operation of the MPWSP Ocean Desalination Plant would lift Stage 4 conditions by providing a drought-proof water supply source available during all year types. Additionally, the proposed project would not contribute to cumulative impacts under Threshold 2 because Mitigation Measure UTIL-2 would ensure that no development associated with the proposed project is approved unless and until project-specific water supply availability is demonstrated. Therefore, potential cumulative impacts associated with water supply availability and reliability would be less than significant.

Wastewater

Cumulative development would increase wastewater generation in the M1W service area. M1W's Sewer System Management Plan includes treatment facility upgrades needed to accommodate growth in the service area and maintain compliance with applicable regulatory standards for wastewater treatment and discharge. The cities of Pacific Grove and Monterey anticipate and plan

for future development through their General Plans, which are then utilized by M1W to assess wastewater generation and infrastructure demand within the M1W Sewer System Management Plan. Therein, it is determined that capacity would exist to service the demand for wastewater treatment facilities. Therefore, the cumulative impacts related to wastewater infrastructure expansion and construction (Thresholds 1 and 3) would be less than significant.

Stormwater

Cumulative development predominantly consists of residential and commercial uses. Cumulative development would be located in urban areas that would be served by existing municipal stormwater drainage systems. Consistent with measures in the applicable Municipal Code, individual cumulative development projects would incorporate a stormwater control plan and stormwater collection systems that would reduce the volume and velocity of stormwater runoff from individual project sites. Therefore, cumulative development would not require the expansion of existing or construction of new stormwater drainage facilities. Cumulative impacts related to stormwater infrastructure and facilities (Threshold 1) would be less than significant.

Solid Waste

Monterey Peninsula Landfill and GreenWaste operate solid waste landfills and oversee regional waste diversion programs, respectively. Cumulative development predominantly consists of residential and commercial uses within previously developed areas, and would increase demand for solid waste disposal services due to increasing solid waste generation. The Monterey Peninsula Landfill would provide solid waste disposal for cumulative projects as well as for development under the proposed project. As discussed in Section 4.16.3, *Impact Analysis*, the proposed project would account for less than one percent of the remaining capacity of the Monterey Peninsula Landfill. In addition, the Local Agency Formation Commission (LAFCO) of Monterey County determined in its 2015 Municipal Service Review of ReGen Monterey (the Monterey Regional Waste Management District) that sufficient solid waste disposal capacity is available to meet existing and likely future service needs throughout ReGen Monterey's Sphere of Influence for at least 150 years (LAFCO 2015). The estimated lifespan of the Monterey Peninsula Landfill was determined to have increased compared to previous projections, due to the implementation of waste reduction technologies and site improvements (LAFCO 2015).

Cumulative projects would be located within ReGen Monterey's Sphere of Influence, and are considered accounted for in the evaluation conducted by the LAFCO of Monterey County's review of the Monterey Peninsula Landfill's remaining capacity. Therefore, solid waste generated by cumulative development would not exceed the available capacity of the Monterey Peninsula Landfill. Existing solid waste facilities provide sufficient capacity to serve anticipated cumulative development in the GreenWaste and Monterey Peninsula Landfill's respective service areas. Potential cumulative impacts related to solid waste facilities (Thresholds 4 and 5) would be less than significant.

4.17 Wildfire

This section identifies and evaluates issues related to wildfire in the context of the proposed project. The section discusses the criteria used to determine the significance of environmental impacts related to wildfire and potential impacts related to wildfire that would result from implementation of the proposed project.

4.17.1 Setting

a. Wildfire Fundamentals

A wildfire is an uncontrolled fire in an area of extensive combustible fuel, including vegetation and structures. Wildfires differ from other fires in that they take place outdoors in areas of grassland, woodlands, brushland, scrubland, peatland, and other wooded areas that act as a source of fuel or combustible material. Buildings may become involved if a wildfire spreads from those natural/vegetated areas to adjacent built communities. The primary environmental factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions. Regions of dense dry vegetation, particularly in canyon areas and on hillsides, pose the greatest potential for wildfire risks. Additional factors that increase an urban area's susceptibility to wildfire are development patterns and density, building types, and building materials.

The effects of wildland fires can be catastrophic. In addition to stripping the land of vegetation and destroying natural resources, post-fire conditions leave exposed slopes and hillsides vulnerable to surface erosion and runoff. Soil exposed to intense heat may lose its capacity to absorb moisture and support life. Debris flows during post-fire rainy seasons can pose a risk to life and property and occur with little warning. Wildfires also have negative impacts on air quality. Exposure to smoke and particulate matter has immediate and long-term public health impacts; populations may suffer from eye irritations, respiratory problems, and complications to existing lung and heart conditions.

Wildfire has three basic elements: how and where its ignition occurred, how and why it moves across a landscape from its point of origin, and what the fire's nature is upon arrival at a location. In general, a fire's nature is defined by eight characteristics:

1. Direction of the advance of the fire front
2. Speed of the advance of the fire front (rate of spread)
3. Mechanism causing the advance
4. Duration at any one location
5. Structure-related consumption of fuels
6. Flame length
7. Intensity
8. Gaining control

A fire front's direction of travel is primarily determined by direction of prevailing winds, geographic aspect, and condition of the fuels in the advance direction of the fire. The speed of a fire front's advance is a result of conditions at the site of the currently burning material and of lands in the advance direction of the fire. As a fire advances, the overriding influences determining its speed are prevailing wind speed, terrain slope gradient, dominant fuel size classes, and fuel continuity.

Wildfires advance by two principal mechanisms: combustion resulting from radiant heating and remote ignition resulting from ember production. Fire stays at one location primarily due to the size class of the material being consumed. Grass formations are dominated by low volumes of very "fine" fuels and, depending on the level of dryness, can be consumed, with the fire advancing, in a matter of minutes. On the other hand, tree-dominated vegetation communities have significantly greater volumes of available fuel and a far greater amount of larger-sized fuel components. Fires can remain at these locations for days, often weeks, and sometimes months (on heavily wooded conifer sites).

Fires burn where fuels are available. Fires in grasslands burn at a level set by the height of the grass, while fires in brushlands can burn surface fuels and typically consume the stems and leafy crowns to the full height of the plants. Fires in tree-dominated vegetation have a much more complex pattern of movement based primarily on the continuity (or "connectedness") of the fuels. In these stands there are typically three distinct layers of fuels, arranged vertically: surface, stems and trunks, and the crown composed of branches, twigs and leaves. The continuity of fuels is important to consider in both horizontal and vertical directions. If a fire enters a stand and is advancing only as a surface fire it will continue this manner of advance if there is high horizontal fuel connectivity. However, if there is also a high degree of vertical continuity (provided by fuels referred to as "ladder fuels") then a fire can move into the crown, as well as forward across the surface, and fuels in the entire stand structure become involved.

Flame lengths are generally determined by the volume of fuels burning, the amount of time to total consumption, and the height of the species in the composition. Grassland produces flame lengths typically ranging from 1 to 3 feet as they are composed of low volumes of fine materials that are consumed quickly. Flame lengths are at their maximum when the material is dry. Stands of brush can produce flame lengths from 4 to 10 feet. Native oak-dominated hardwood stands can generate 20- to 40-foot flame lengths and stands of exotics, such as *Eucalyptus globulus* or *Eucalyptus cinerea,* or dense conifer stands, over 100 feet. Flame length is important as it sets the distance over which radiant heating-related combustion can occur.

The temperature achieved in a wildfire is directly related to the amount of cellulosic material available for consumption. Grasslands have very low amounts and attain lower temperatures but fires in woodlands, characterized by large amounts of highly concentrated cellulosic material, can attain temperatures on the order of 1,800 degrees Fahrenheit.

Gaining control over a wildfire's behavioral character is the objective of response efforts. Grassland fires, burning in low-fuel volume, rapid consumption, and at a single level are the easiest to bring under control. On the other end, fires that are burning in high-fuel volumes, full-spectrum size classes, and entire stand structure involvement can require days, weeks, or even months to bring under complete control.

Wildland-Urban Interface

The Wildland Urban Interface (WUI) is the area where human development meets wildland vegetation, and it is typically characterized by a mix of residential, commercial, and natural land uses. The California Department of Forestry and Fire Protection (CAL FIRE) uses a combination of housing density, Fire Hazard Severity Zone (FHSZ) classification, and vegetation lifeform criteria for mapping WUIs as part of their Fire and Resource Assessment Program.

The WUI is particularly vulnerable to wildfire because it combines the presence of human-built structures with the presence of combustible vegetation and other wildfire fuels. The concept of the WUI is not new, although more often, extreme climate events are driving wildfire through the WUI and into areas not necessarily representative of WUI. This has led to a need for more public outreach and education for residents to learn about defensible space and home hardening strategies. Pursuant to CAL FIRE, an area must meet all of the following criteria in order to be considered a WUI (CAL FIRE 2019a):

- Minimum housing density of one unit per 20 acres
- In a Moderate, High, or Very High FHSZ
- Not dominated by wildland vegetation (herbaceous, hardwood, conifer, shrub)

The Wildland Urban Intermix is a similar term commonly used interchangeably with WUI, although it is typically represented by areas with much higher vegetation density among built infrastructure. Pursuant to CAL FIRE, an area must meet all of the following criteria in order to be considered Wildland Urban Intermix (CAL FIRE 2019a):

- Areas not designated WUI
- Minimum housing density between one unit per 20 acres and one unit per 5 acres OR greater than one unit per 5 acres in areas dominated by wildland vegetation
- In a Moderate, High, or Very High FHSZ
- Improved parcels only

CAL FIRE has also identified Wildfire Influence Zones as wildfire-susceptible vegetation up to 1.5 miles from areas designated as a WUI or Wildland Urban Intermix (CAL FIRE 2019a). These zones essentially serve as a buffer to these two designations.

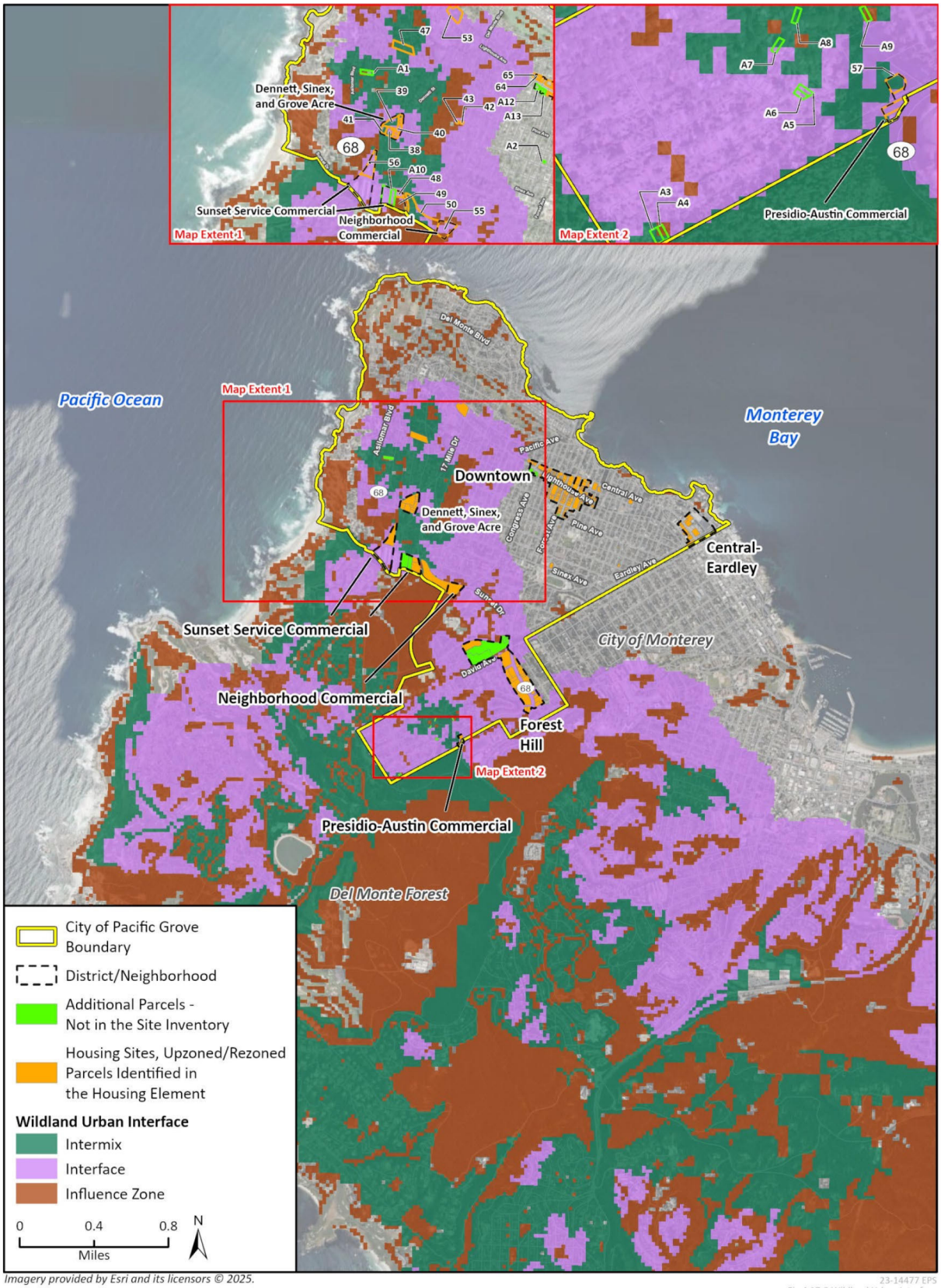
The City contains WUI, Wildland Urban Intermix, and Wildfire Influence Zones, primarily in the western portion of the city (CAL FIRE 2019a).[1] As shown on Figure 4.17-1, the Dennett, Sinex, and Grove Acre Neighborhood; Sunset Commercial District; Neighborhood Commercial District; Forest Hill Commercial District; Presidio-Austin Commercial District; and various sites throughout the City are located in mapped WUI, Wildland Urban Intermix, and/or Wildfire Influence Zones.

b. Wildfire-Conducive Conditions

Situated along the coast, wind is a primary factor in regard to wildfire-conducive conditions in Pacific Grove. Prevailing winds originate from the west (i.e., the ocean), which could play a pivotal role in both the intensity and trajectory of potential wildfires (Iowa State University 2023). Pacific Grove contains minimal vegetation within its boundaries, attributed to extensive development. George Washington Park, located in the western portion of the city, and the adjacent Del Monte Forest, located southwest of the city, serve as the closest areas with substantial concentrations of vegetation. These less-developed regions play a crucial role in understanding the broader wildfire risk landscape surrounding Pacific Grove.

[1] It should be noted that CAL FIRE designates three zones within the overall WUI area: Intermix, Interface, and Influence Zone. These zones are reflected on Figure 4.17-1.

Figure 4.17-1 Wildland Urban Interface



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Additional data provided by CALFIRE, 2019.

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Fig 4.17-2 Wildland Urban Interface

Vegetation

Vegetation is fuel to a wildfire, and it changes over time with seasonal growth and die-back. The relationship between vegetation and wildfire is complex, but generally some vegetation is naturally fire resistant, while some vegetation is extremely flammable. Grass is considered an open fuel, in which oxygen has free access to promote the spread of fire. Additionally, weather and climate conditions, such as drought, can lead to increasingly dry vegetation with low-moisture content and, thus, higher flammability. The project site contains multiple plant communities, described in greater detail in Section 4.3, *Biological Resources*, such as vernal pools, broadleaf upland forest, native grasslands, and arid chaparral.

Slope, Elevation, and Aspect

Slope can determine how quickly a fire spreads. Fire typically burns faster uphill, because it can pre-heat the fuels above with rising hot air, and upward drafts are more likely to create fire spots (National Park Service 2017). Areas containing steep, rugged terrain can also hinder access and the use of heavy firefighting equipment, posing additional difficulties for firefighting efforts (CAL FIRE 2022). Following severe wildfires, sloping land is also more susceptible to landslide or flooding from increased runoff during substantial precipitation events. Landslides and surficial slope failure are most likely to occur in areas with more than 25 percent slope (hillside areas) and along steep bluffs.

Elevation affects fire behavior by influencing the timing and amount of precipitation, and exposure to prevailing winds. Aspect is the direction that a slope faces, which determines how much radiated heat the slope will receive from the sun. Slopes facing south to southwest will receive the most solar radiation; thus, they tend to be warmer and the vegetation drier than on slopes facing a northerly to northeasterly direction, creating a higher potential for wildfire ignition and spread (University of California Berkeley 2018).

Pacific Grove is a coastal city characterized by gently sloping topography across its four-square-mile expanse, with an average elevation of approximately 200 feet above sea level. Figure 4.17-2 shows the slopes of the housing sites located in or near Very High FHSZ. Only relatively small portions of the city contain slopes over 30 percent: Calabrese Canyon, some coastal bluffs, Benito Avenue, Piedmont Avenue, Hillside Avenue, Adobe Lane, and Syida Drive (City of Pacific Grove 1994). This local variation underscores the significance of considering diverse geographical features in evaluating the wildfire risk profile of the region.

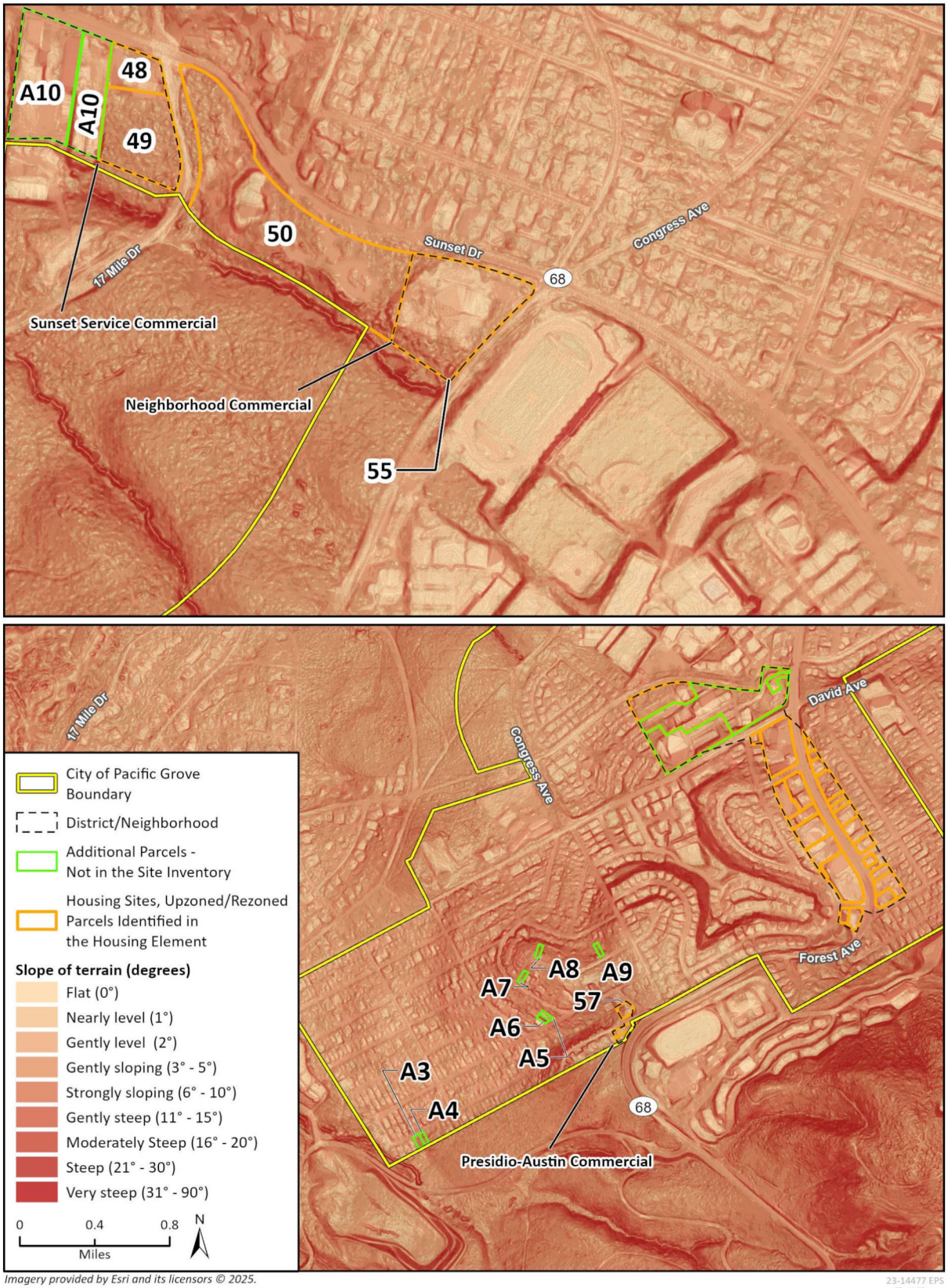
Climate and Weather

Wind, temperature, and relative humidity are the most influential weather elements in fire behavior and susceptibility (National Park Service 2017). Fire moves faster under hot, dry, and windy conditions. Wind may also blow embers ahead of a fire, causing its spread. Drought conditions also lead to extended periods of excessively dry vegetation, increasing the fuel load and ignition potential.

The city's climate exhibits a pattern of wet winters followed by warm and dry summers, contributing to the desiccation of vegetation during the dry season.

There are two weather stations, Monterey Peninsula and Fort Ord Fritzsche AAF, within 10 miles of the project area. Table 4.17-1 presents wind data from the two stations and includes the primary wind source directions and average wind speed. The data has been further divided into two seasonal periods: March to October (which roughly corresponds to the fire season) and the wetter months between November and April.

Figure 4.17-2 Slopes in Housing Sites Located in Very High FHSZ



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Additional data provided by Airbus, USGS, NGA, NASA, CGIAR, NLS, OS, NMA, Geodatastyrelsen, GSA, GSI.

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Fig X Slopes

Table 4.17-1 Wind Data Table

	Seasonal Period			
	March – October		November – April	
Station	PWD	AWS (mph)	PWD	AWS (mph)
Monterey Peninsula	West – Northwest	7.4	East – Southeast	6.5
Fort Ord Fritzsche AAF	West – Northwest	6.5	East – Southeast	5.5

PWD = wind source direction, AWS = average wind speed, mph = miles per hour

Source: Iowa State University IEM 2025

c. Power Lines

Above-ground power lines have the potential to contribute to wildfire risk, especially when they are near or traverse wilderness areas. In some instances, high winds can blow nearby trees and branches into powerlines, sparking fires. Wind can also snap wooden poles, causing live wires to fall onto nearby grass or other fuel, igniting it. While the California Public Utilities Commission (CPUC) estimates only about 10 percent of California's wildfires are triggered by power lines, the frequency and severity of these wildfires has spurred the agency to make new requirements for power line safety practices (Atkinson 2018).

The project area contains existing overhead utility lines primarily along major roadways and within residential neighborhoods, providing electrical, telecommunications, and other services. These utilities are typically located within public rights-of-way and utility easements, with some areas featuring undergrounded infrastructure.

d. Wildfire Hazard Designations

In California, state and local agencies share responsibility for wildfire prevention and suppression and federal agencies take part as well. Federal agencies are responsible for federal lands in Federal Responsibility Areas (FRA). The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of statewide interest and have classified those lands as State Responsibility Areas (SRA). CAL FIRE manages SRAs. All incorporated areas and unincorporated lands not in FRAs or SRAs are classified as Local Responsibility Areas (LRA). The City of Pacific Grove is within an LRA.

While nearly all of California is subject to some degree of wildfire hazard, there are specific features that make certain areas more hazardous. CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors (PRC 4201-4204, California Government Code 51175-89). As described above, the primary factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE maps fire hazards based on zones, referred to as FHSZs. There are three levels of severity: Moderate; High; and Very High. As of January 2022, California State Law requires CAL FIRE to map the Moderate and High FHSZ in addition to the Very High FHSZ. Updates to the CAL FIRE SRA FHSZ maps were made in 2023 and became effective in 2024, and CAL FIRE released updated LRA FHSZ recommendations in March 2025.

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 FHSZs must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life in those areas. However, none of the fire zones specifically prohibit

development or construction. To reduce fire risk under state regulations, areas in Very High FHSZs must comply with specific building and vegetation management requirements.

The City of Pacific Grove is not within a SRA. The southwestern portion of the city, generally south of Sunset Drive and southwest of David Avenue, is designated by CAL FIRE as a FHSZ. The following sites, additional parcels, and districts are located within a FHSZ.

Moderate FHSZ

- Sunset Service Commercial District (Sites 48 and 49, and additional parcel A10)
- Neighborhood Commercial District (Site 55)
- Northwestern portion of Forest Hill District (Site 23, 29 and additional parcel A11)
- Site 50

High FHSZ

- Central portion of Forest Hill District (Sites 20, 21, 22, 24, 25, 26, 27, 28, 30, and 31)

Very High FHSZ

- Southeastern portion of Forest Hill District (Sites 32, 33, 34, 35, 36, and 37)
- Presidio-Austin Commercial District (Site 57)
- Additional parcels A3, A4, A5, A6, A7, A8, and A9

Moderate, High, and Very High FHSZs and the housing sites and additional parcels within each designation are shown in Figure 4.17-3. Figure 4.17-3 also shows how FHSZs have changed between CAL FIRE's 2024 and 2025 mapping recommendations.

Fire History

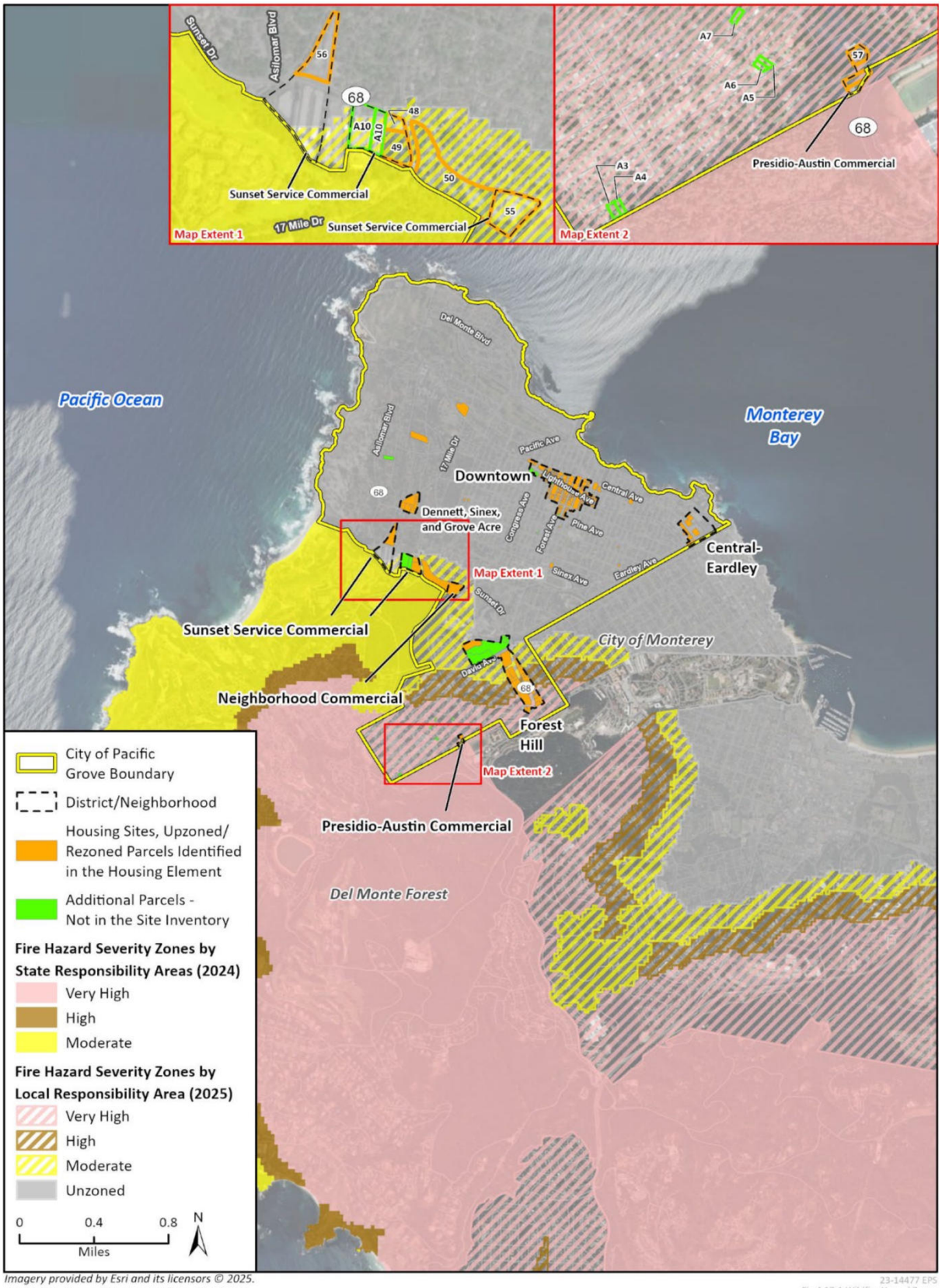
The County of Monterey has kept records of its fire history dating back to 1911. Since then, multiple wildfires have burned in the county. However, no severe fires occurred within the City of Pacific Grove. The nearest severe wildfire to the city was the Carmel Fire in 2020, which burned 6,905 acres approximately 13 miles southeast of the city limits (County of Monterey 2022).

e. Post-fire Slope Instability and Drainage Pattern Changes

Vegetation loss from wildfire scarring of the landscape can result in slope instability in the form of more intensive flooding and landslides. These post-fire slope soils and altered drainage patterns can result in soil creep on downslope sides of foundations and reduce lateral support.

Pacific Grove is situated on stable bedrock, so the potential for significant damage from either lurch cracking or lateral spreading is low (City of Pacific Grove 1994: 3). However, earthquakes large enough to be felt can cause rockfalls, landslides, rock avalanches, and mud and debris flows. Severe landslide damage and disruption of access could occur as the result of a moderate or major earthquake along State Route (SR) 68 as it passes through areas with steeper terrain and potentially more unstable slopes compared to relatively flat conditions in most of the City (City of Pacific Grove 1994: 3).

Figure 4.17-3 Pacific Grove Fire Hazard Severity Zones



f. Fire Protection Services

Pacific Grove is served by the Pacific Grove Fire Department, which is a part of the Monterey Fire Department (MFD). MFD provides fire prevention and suppression services, emergency medical services, rescue, and wildland urban interface. The Pacific Grove Fire Department protects a geographical area of 2.5 square miles with an estimated population of 15,500 residents and responds to approximately 1,450 calls a year (City of Pacific Grove 2024). MFD is composed of six stations: four in Monterey, one in Pacific Grove, and one in Carmel-by-the-Sea. These stations are described in detail in Section 4.13, *Public Services and Recreation.* Monterey County is a "Contract County" under CAL FIRE, meaning the County provides initial attack response to fires, while CAL FIRE provides funding for fire protection services, including salaries and wages, maintenance of firefighting facilities, pre-fire management positions, special repairs, and administrative services (CAL FIRE 2022). Pacific Grove also has mutual aid agreements with all fire agencies in Monterey County, the County Communications Center, and the Peninsula Medics Ambulances Company (City of Pacific Grove 1994: 14).

4.17.2 Regulatory Setting

a. Federal Regulations

Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 provided a new set of mitigation plan requirements for state and local jurisdictions that encourage them to coordinate disaster mitigation planning and implementation. States are encouraged to complete a "Standard" or an "Enhanced" Natural Mitigation Plan. Enhanced plans demonstrate increased coordination of mitigation activities at the state level and, if completed and approved, increase the amount of federal funding available through the Hazard Mitigation Grant Program. The State of California Multi-Hazard Mitigation Plan (SHMP) complies with this act.

National Fire Plan

The National Fire Plan was developed in response to Executive Order 11246 in August 2000, following a historic wildland fire season. Its intent was to establish plans for active response to severe wildland fires and their impacts to communities, while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability. The program promotes close coordination among local, state, tribal, and federal firefighting resources by conducting training, purchasing equipment, and providing prevention activities on a cost-share basis. To help protect people and their property from potential catastrophic wildfire, the National Fire Plan directs funding to be provided for projects designed to reduce the fire risks to communities (United States Department of Agriculture, United States Department of the Interior 2000). High-risk communities identified in the wildland-urban interface, the area where homes and wildlands intermix, were published in the Federal Register in 2001. At the request of Congress, the Federal Register notice only listed those communities neighboring federal lands (Department of the Interior 2002). CAL FIRE incorporates concepts from this plan into state fire planning efforts (CAL FIRE 2019b).

b. State Regulations

California Fire Code

The California Fire Code (CFC) is located in Title 24, Chapter 9 of California Code of Regulations (CCR) and is a fully integrated code based on the International Fire Code. The CFC establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structure, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC uses a hazard classification system to determine what protective measures are required to ensure fire safety and protect lives. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification.

More specifically, CFC Chapter 8 addresses fire related Interior finishes; CFC Chapter 9 addresses fire protection systems; and CFC Chapter 10 addresses fire-related means of egress. CFC Chapter 49 also contains regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings in FHSZs in SRAs, LRAs, and wildland-urban interface fire areas.

California Building Code: Wildland-Urban Interface Building Standards

On September 20, 2007, the California Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending CCR, Title 24, Part 2, known as the California Building Code (CBC), to include wildland-urban interface standards. The provisions of the CBC apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout California. The wildland-urban interface standards include provisions for ignition-resistant construction standards in the wildland-urban interface and use a hazard classification system to determine what protective measures are required to ensure fire safety and protect lives. Specifically, CBC Chapter 7A addresses materials and construction methods for exterior wildfire exposure. Furthermore, CBC (Part 9), Chapter 49 includes mitigation strategies to reduce the hazards of fire originating within a structure to spread to wildlands, and fire originating in wildlands to spread to structures through development and implementation of fire protection plans, landscape plans, long-term vegetation management, and creation and maintenance of defensible space.

2019 California Strategic Fire Plan

The 2019 California Strategic Fire Plan prepared by CAL FIRE and the California Natural Resources Agency lays out central goals for reducing and preventing the impacts of fire in the state. The goals are meant to establish a natural environment that is more resilient and human-made assets that are more resistant to the occurrence and effects of wildland fire through local, state, federal, and private partnerships (CAL FIRE 2019b). In addition to the 2019 California Strategic Fire Plan for California, individual CAL FIRE units develop fire plans, which are strategic documents that establish a set of tools for each CAL FIRE unit for its local area. Updated annually, unit fire plans identify wildfire protection areas, initial attack success, assets and infrastructure at risk, pre-fire management strategies, and accountability in their unit's geographical boundaries. The unit fire plan identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live

and work locally. The unit fire plans include contributions from local collaborators and stakeholders and are aligned with other plans applicable to the area (CAL FIRE 2019b).

California Multi-Hazard Mitigation Plan

The California Governor's Office of Emergency Services (Cal OES) prepares the SHMP, which identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy (Cal OES 2023). The SHMP is required under the Disaster Mitigation Act of 2000 for the state to receive federal funding (see earlier description of this Act). The SHMP represents the state's primary hazard mitigation guidance document, providing an updated analysis of the state's historical and current hazards, hazard mitigation goals and objectives, and hazard mitigation strategies and actions. The SHMP represents the state's overall commitment to supporting a comprehensive mitigation strategy to reduce or eliminate potential risks and impacts of disasters in order to promote faster recovery after disasters and, overall, a more resilient state. SHMPs are required to meet the elements outlined in the Federal Emergency Management Agency's (FEMA) State Mitigation Plan Review Guide (FEMA 2016).

Cal OES is responsible for the development and maintenance of the state's plan for hazard mitigation. The state's SHMP was last approved by FEMA as an Enhanced State Mitigation Plan in 2023. The plan is designed to reduce the effects of disasters caused by natural, technological, accidental, and adversarial/human-caused hazards. The SHMP sets the mitigation priorities, strategies, and actions for the state. The plan also describes how risk assessment and mitigation strategy information is coordinated and linked from local mitigation plans into the SHMP and provides a resource for local planners of risk information that may affect their planning area. The State of California is required to review and revise its mitigation plan and resubmit for FEMA approval at least every five years to ensure continued funding eligibility for certain federal grant programs.

California State Emergency Plan

The foundation of California's emergency planning and response is a statewide mutual aid system, designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with an emergency situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555 through 8561) requires signatories to the agreement to prepare operational plans to use in their jurisdiction and outside their area. These operational plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all state agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

The California State Emergency Plan (SEP) describes how response to natural or human-caused emergencies occur in California. The plan is a requirement of the California Emergency Services Act and describes methods for conducting emergency operations, the process for rendering mutual aid, emergency services of government agencies, how resources are mobilized, how the public is informed, and how continuity of government is maintained during emergency. The SEP further describes hazard mitigation (actions to reduce risk), as well as preparedness and recovery from disasters. (Cal OES 2017)

California Government Code Section 8568, the California Emergency Services Act, states that "the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the

provisions thereof." The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the act are further reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies.

All local emergency plans are extensions of the SEP. The SEP conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies. The SEMS incorporates the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and state. Cal OES divides the state into several mutual aid regions (Cal OES 2017). The project area is located in Region II South, currently coordinated by Mark Courson (Cal OES 2024).

California Public Resource Code

The California Public Resource Code (PRC) includes fire safety regulations for forest, range, and forage lands that restrict the use of equipment that may produce a spark, flame, or fire, require the use of spark arrestors on construction equipment that use an internal combustion engine, specify requirements for the safe use of gasoline-powered tools in fire hazard areas, and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas. These regulations include the following:

- On days when a burning permit is required, flammable materials shall be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and fire suppression equipment shall be available in the immediate area (PRC Section 4427)
- During the highest fire danger period from April 1 to December 1, no person except for an emergency crew member or those under or contracted with a publicly or privately-owned utility shall use tools powered by an internal combustion engine in any industrial operation located on or near any forest, brush, or grass-covered land, and appropriate fire suppression equipment shall be made immediately available (PRC Section 4428)
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines shall not be used within 25 feet of any flammable materials (PRC Section 4431)
- Earthmoving and portable equipment with internal combustion engines must be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC Section 4442)

In addition, PRC Section 4290 establishes minimum wildfire protection standards in conjunction with building, construction, and development in SRAs and Very High FHSZs in LRAs. Under PRC Section 4290, the design and construction of structures, subdivisions, and developments in SRAs must provide for basic emergency access and specified perimeter wildfire protection measures. These measures provide for road standards for emergency access, signing and building numbering, water supply reserves, and fuel breaks and greenbelts and are known as the State Minimum Fire Safe Regulations.

Executive Order N-05-19

On January 9, 2019, Governor Gavin Newsom issued Executive Order N-05-19 to address wildfire in California. Executive Order N-05-19 directs CAL FIRE, in consultation with other state agencies and departments, to recommend immediate, medium-term, and long-term actions to help prevent destructive wildfires. In response, CAL FIRE created the Community Wildfire Prevention and Mitigation Report, which contains recommendations to reduce damage from wildfires across the state. Specifically, they focus on reducing wildfire fuel (such as vegetation clearing), long-term community protection (creating defensible space in communities), wildfire prevention, and forest health (CAL FIRE 2024).

Government Code Section 51182

According to Government Code Section 51182 (amended by Assembly Bill [AB] 3074 and Senate Bill [SB] 63, which created a new 0- to 5-foot ember resistant zone and new definitions and requirements for defensible space, respectively), a person who owns, leases, controls, operates, or maintains an occupied dwelling or occupied structure in, upon, or adjoining a mountainous area, forest-covered land, brush-covered land, grass-covered land, or land that is covered with flammable material, or land that is in a Very High FHSZ shall at all times do all of the following:

1. Maintain defensible space of 100 feet from each side and from the front and rear of the structure.
2. Remove that portion of a tree that extends within 10 feet of the outlet of a chimney or stovepipe.
3. Maintain a tree, shrub, or other plant adjacent to or overhanging a building free of dead or dying wood.
4. Maintain the roof of a structure free of leaves, needles, or other vegetative materials.
5. Prior to constructing a new dwelling or structure that will be occupied or rebuilding an occupied dwelling or occupied structure damaged by a fire in that zone, the construction or rebuilding of which requires a building permit, obtain a certification from the local building official that the dwelling or structure, as proposed to be built, complies with all applicable state and local building standards.

Assembly Bill 3074 (2021)

AB 3074 amends California's defensible space requirements under PRC Section 4291 to enhance wildfire mitigation in SRAs and Very High FHSZ within LRAs. The bill introduces a "Zone 0" ember-resistant zone, requiring the removal of flammable vegetation and materials within five feet of structures to reduce wildfire ignition risks. The California Board of Forestry and Fire Protection is responsible for implementing these regulations, which apply to new construction and, upon regulatory adoption, to existing structures.

Senate Bill 63 (2021)

SB 63 expands California's defensible space inspection requirements under Government Code Section 51182. The bill mandates that CAL FIRE conduct defensible space inspections in Very High FHSZ within LRAs, in addition to SRAs. This extends state oversight to certain high-risk areas under local jurisdiction, aiming to enhance wildfire prevention and compliance with defensible space regulations.

Senate Bill 1241 (2012)

SB 1241 (2012) requires cities and counties in SRAs and Very High FHSZs to address fire risk in the safety element of their general plans. SB 1241 also resulted in amendments to the *CEQA Guidelines* in 2018 to include questions related to fire hazard impacts for projects located in or near lands classified as SRAs and Very High FHSZs. In adopting these amendments, the California Office of Planning and Research recognized that low-density, leapfrog development may create higher wildfire risks than high-density, infill development.

Senate Bill 1028 (2016)

SB 1028 (2016) requires each electrical corporation to construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those components, and makes a violation of these provisions by an electrical corporation a crime under state law. The bill also requires each electrical corporation to annually prepare a wildfire mitigation plan submitted to CPUC for review. The plan must include a statement of objectives, a description of preventive strategies and programs that are focused on minimizing risk associated with electric facilities, and a description of the metrics that the electric corporation uses to evaluate the overall wildfire mitigation plan performance and assumptions that underlie the use of the metrics.

Assembly Bill 2911 (2018)

Following the devastating 2017 fire season, Assembly Bill 2911 (2018) was adopted to improve fire safety in subdivision developments. AB 2911 requires the State Board of Forestry and Fire Protection, in consultation with the State Fire Marshal, to survey local governments including counties, cities, and fire districts to identify existing subdivisions located in SRAs or Very High FHSZs that are without a secondary means of egress route and are at significant fire risk. Through this Subdivision Review Program, the State Board of Forestry and Fire Protection works with local governments and agencies on a project-by-project basis to develop recommendations to create secondary access to the subdivision, improvements to existing access roads, and other fire safety measures.

Assembly Bill 747 (2019)

Assembly Bill 747 (2019) requires local hazard mitigation plans and safety elements of general plans to be reviewed and updated, as necessary, to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. AB 747 authorizes a city or county that has adopted a local hazard mitigation plan, emergency operations plan, or other document that fulfills commensurate goals and objectives to use that information in the safety element of the general plan to comply with this requirement by summarizing and incorporating by reference that other plan or document in the safety element.

Senate Bill 99 (2019)

SB 99 (2019) requires that, during the next housing element revision, safety elements of general plans be reviewed and updated to identify residential developments in any hazard area that do not have at least two evacuation routes.

California Public Utilities Commission General Orders

General Order 95

CPUC General Order 95 applies to construction and reconstruction of overhead electric lines in California. The replacement of poles, towers, or other structures is considered reconstruction and requires adherence to all strength and clearance requirements of this order. Additionally, General Order 95 requires each utility company to establish an auditable maintenance program. CPUC has promulgated various rules to implement the fire safety requirements of General Order 95, including:

- Rule 18A requires utility companies to take appropriate corrective action to remedy safety hazards.
- Rule 31.2 requires that lines be inspected frequently and thoroughly.
- Rule 35 requires that vegetation management activities be performed in order to establish necessary and reasonable clearances. These requirements apply to all overhead electrical supply and communication facilities that are covered by General Order 95, including facilities on lands owned and maintained by state and local agencies.
- Rule 38 establishes minimum vertical, horizontal, and radial clearances of wires from other wires.
- Rule 43.2.A.2 requires that wind loads established in Rule 43.2.A.1 be multiplied by a wind load factor of 1.1 for lines located in all parts of California where the elevation above sea level is 3000 feet or less. (CPUC 2018)

General Order 165

CPUC General Order 165 establishes requirements for the inspection of electric distribution and transmission facilities that are not contained in a substation. Utilities must perform “patrol” inspections, defined as a simple visual inspection of utility equipment and structures and designed to identify obvious structural problems and hazards, at least once per year for each piece of equipment and structure. “Detailed” inspections, where individual pieces of equipment and structures are carefully examined, are required every five years for all overhead conductor and cables, transformers, switching/protective devices, and regulators/capacitors. By July 1 of each year, each utility subject to this General Order must submit an annual report of its inspections for the previous year under penalty of perjury (CPUC 2017a).

General Order 166

CPUC General Order 166 Standard 1.E requires that investor-owned utilities develop a fire prevention plan that describes measures that the electric utility will implement to mitigate the threat of power-line fires generally. Additionally, this standard requires that investor-owned utilities outline a plan to mitigate power-line fires when wind conditions exceed the structural design standards of the line during a Red Flag Warning in a high fire threat area. Fire prevention plans created by investor-owned utilities are required to identify specific parts of the utility’s service territory where the conditions described above may occur simultaneously. Standard 11 requires that utilities report annually to CPUC regarding compliance with General Order 166 (CPUC 2017b).

c. Local Regulations

County of Monterey Multi-Jurisdictional Hazard Mitigation Plan

Adopted in 2016, and last updated in 2022, the County of Monterey Multi-Jurisdictional Hazard Mitigation Plan includes hazard profiles, risk assessments, mitigation strategies, and Plan Implementation and Maintenance. The plan was prepared in coordination with FEMA, the Cal OES, and participating jurisdictions, including the City of Pacific Grove. It focuses on 12 Monterey County cities, including Pacific Grove, as well as unincorporated Monterey County. The plan follows the planning guidance of the FEMA Community Rating System and addresses local mitigation planning requirements pursuant to the Disaster Mitigation Act of 2000. The plan includes Mitigation Goal 7, which requires jurisdictions to enhance their codes and enforcement where feasible, so that new construction can withstand the impacts of known hazards and to lessen the impact of development on the environment's ability to absorb the impact of natural hazards (County of Monterey 2022).

Community Wildfire Protection Plan

The purpose of the Community Wildfire Protection Plan is to help reduce the potential loss of human life and damage to property, and natural resources within Pacific Grove, Monterey, and Carmel-by-the-Sea due to wildfire. The plan describes wildfire risk and potential throughout the cities, providing goals, policies, and discusses resources available (Monterey Fire Department 2023).

Pacific Grove Municipal Code

Section 18.04.010 of the Municipal Code adopts the California Building Code by reference with certain amendments. The City's building code provisions regarding fire protection are either identical to or more stringent than those found in the California Building Code. Specifically, Section 18.04.050 requires new buildings (excluding accessory structures and single-family dwellings) to have fire hydrants, fire mains, and sewer mains installed per Chapter 24.08, unless deemed unnecessary by the fire chief or city engineer. Building permits cannot be issued until these requirements are met.

Pacific Grove General Plan

The City of Pacific Grove 1994 General Plan's Health and Safety Element includes the following goals, policies, and programs that are relevant to wildfire risks:

- **Policy 6.** Ensure that City emergency response procedures are adequate to deal with natural or man-made disasters in the community.
- **Policy 7.** Periodically update and test the effectiveness of the City's Multi-Hazard Emergency Plan.
- **Policy 8.** Ensure that individuals and agencies assigned emergency responsibilities under the Multi-Hazard Emergency Plan prepare appropriate supporting plans and related standard operating procedures.
- **Policy 9.** Maintain a level of preparedness adequate to implement all parts of the Multi-Hazard Emergency Plan**.**
    - **Program D.** Periodically review and update alerting procedures and resources lists.

- **Program E.** Review County and State emergency response plans and procedures to ensure coordination with the City's Multi-Hazard Emergency Plan as part of the periodic update of the City's plan.
- **Program F.** Develop and implement public information programs concerning disaster response and emergency preparedness.
- **Program G.** Identify emergency access routes.
- **Program H.** Include provisions for persons with disabilities in emergency response plans.
- **Program I.** Identify alternative water sources for fire-fighting purposes for use during a disaster.
- **Program J.** Designate and develop a command center for use during emergencies.
- **Program K.** Develop and maintain mutual aid agreements and communications links with surrounding jurisdictions for assistance during emergencies.

Goal 4. Prevent loss of life, injury, and property damage from fires, release of hazardous materials, natural disasters, and exposure to other hazardous conditions.

Goal 5. Ensure an adequate level of fire and medical emergency service to the community.

- **Policy 13.** Require new development to provide all necessary water service, fire hydrants, and roads consistent with Fire Department standards and City requirements which relate to the project.
- **Policy 14.** Require new development to comply with the minimum fire-flow rates contained in Appendix III-A in the most recent and locally-adopted edition of the Uniform Fire Code.
- **Policy 15.** Require all construction to meet the applicable current City codes for fire and life safety.
- **Policy 16.** Ensure adequate fire equipment access through the development review process.
- **Policy 17.** Ensure adequate water fire-flow throughout the city.
  - **Program P.** Regularly monitors fire-flow to ensure adequacy.

4.17.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The assessment of impacts related to wildfire hazards and risks were evaluated using CAL FIRE FHSZ mapping for Pacific Grove and topographic mapping. Additionally, weather patterns related to prevailing winds and precipitation trends were evaluated as they relate to the spread and magnitude of wildfire. As a programmatic document, this Program DEIR presents a citywide assessment of the proposed project. Because the Housing Element Update, Zoning Amendments, and General Plan Amendments are long-term documents intended to guide actions for many years into the future, this analysis relies on program-level and qualitative evaluation.

CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. Consequently, impacts under the thresholds identified below would only be considered significant if the proposed project risks exacerbating those existing environmental conditions.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on wildfire if it is located in or near state responsibility areas or lands classified as very high fire hazard severity zones and it would:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan;
2. 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;
3. 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; and/or
4. 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.

b. Project Impacts and Mitigation Measures

Threshold 1:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact W-1 THE PROPOSED PROJECT WOULD UPDATE THE CITY OF PACIFIC GROVE'S HEALTH AND SAFETY ELEMENT OF THE GENERAL PLAN, INCLUDING UPDATES TO POLICIES THAT ADDRESS EMERGENCY ACCESS, RESPONSE, AND PREPAREDNESS. THEREFORE, THE PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As shown in Figure 4.17-3, the southwestern portion of the city, generally south of Sunset Drive and southwest of David Avenue, is designated by CAL FIRE as a FHSZ. As shown in Figure 4.17-3, the southernmost portion of the city is within a Very High FHSZ, and as discussed under Section 4.17.1d., *Wildfire Hazard Designations,* several housing sites and additional parcels are located in the Very High FHSZ (Sites 32 – 37, Site 57, and additional parcels A3 – A9). Sites 20 – 22, 24 – 28, 30, and 31 are located within a High FHSZ, and Sites 23, 29, 48, 49, 50, 55, and additional parcels A10 and A11 are located within a Moderate FHSZ. Sites 48, 49, 55, 57, and the Forest Hill District sites are currently developed with existing commercial or institutional structures. Additional parcels A3 through A9 are currently developed with residential uses.

The proposed project would facilitate increased density of development, with up to 61 residential units on Site 55, up to 6 residential units on Site 57, 1 residential unit on Site A3, 1 residential unit on Site A4, and 347 residential units in the Forest Hill District Sites. Development facilitated by the project on these sites would increase the number of vehicles traveling to and from these sites. The City of Pacific Grove is a developed area with urban land uses and interspersed vegetation. As discussed above, the city has no history of wildfire.

The proposed project is a policy document that facilitates the development of housing in the city through 2031. As described in Chapter 2, *Project Description*, the project is intended to focus development on the identified housing sites and additional parcels, which are mostly surrounded by existing development and infrastructure, with the exception of the southwestern parts of the city,

including Sites 50 and 55, which are adjacent on one side to undeveloped areas immediately southwest of the city boundary. Development facilitated by the project would be considered infill.

The City would evaluate development facilitated by the project on a project-specific basis for wildfire safety, including the ability of emergency vehicles to access the site and ease of evacuation. Pacific Grove receives wildfire protection services from MFD. MFD reviews development proposals to ensure development would not interfere with evacuation routes or impede the effectiveness of evacuation plans. Development facilitated by the project would be required to comply with all applicable federal, state, and local regulations governing fire safety, including adequate fire access. This includes the 2022 California Fire Code, which contains project-specific requirements such as construction standards in new structures and remodels, and road widths and configurations designed to accommodate the passage of fire trucks and engines. Future development would also be reviewed for consistency with the goals and policies of the Health and Safety Element, which are listed above under "Health and Safety Element" in Section 4.13.2, *Regulatory Setting.* In particular, when reviewing future development, the City would consider Policy 16, which aims to ensure adequate fire equipment access, and Policy 23, which aims to maintain and enhance the current response times and level of emergency service to the community. Further, the project involves updates and revisions to the City's General Plan Health and Safety Element, to include background information and maps to reflect existing conditions, identification of evacuation routes and capacity, and revised policies related to climate change, fire hazards, flooding, and emergency response. Refer to Appendix C for all proposed revisions to the Health and Safety Element. At the time of preparation of this DEIR, the proposed revisions to the Health and Safety Element have not yet been finalized. Final revisions are subject to review and approval by the California Board of Forestry and subsequent adoption by the City of Pacific Grove. This process shall be completed prior to certification and adoption of the Final EIR. Because the purpose of these revisions is to comply with AB 747 and SB 99, and proposed revisions would be approved by the California Board of Forestry, it is not anticipated that further changes to the proposed revisions would substantially alter the intent of the revisions.

Existing and proposed Health and Safety Element policies and programs ensure that emergency response and evacuation plans remain effective in the event of a disaster, including wildfires in SRAs or Very High FHSZs. Policies 6 through 9 emphasize maintaining and updating the City's Multi-Hazard Emergency Plan, ensuring preparedness, coordination with other agencies, and the development of supporting procedures. Programs D through K further strengthen emergency response by reviewing alert procedures, identifying emergency access routes, accounting for persons with disabilities, and designating alternative water sources for firefighting. These measures help prevent substantial impairment of emergency response or evacuation plans by ensuring coordination, preparedness, and resource availability in high-risk fire areas.

Because the City and MFD would review development facilitated by the proposed project to ensure compliance with emergency access standards, and the project includes policies and programs to enhance emergency preparedness, evacuation planning, and wildfire risk mitigation, impacts related to impairing an adopted emergency response plan or emergency evacuation plan would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

Impact W-2 THE CITY CONTAINS MINIMAL SLOPES AND EXPERIENCES PREVAILING WINDS ORIGINATING FROM THE PACIFIC OCEAN. DEVELOPMENT FACILITATED BY THE PROJECT WOULD ADHERE TO THE CFC AND BE REVIEWED BY MFD TO ENSURE DEVELOPMENT WOULD NOT EXACERBATE WILDFIRE RISK DUE TO SLOPE, PREVAILING WINDS, OR OTHER FACTORS. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As shown in Figure 4.17-3, the southwestern portion of the city, generally south of Sunset Drive and southwest of David Avenue, is designated by CAL FIRE as a FHSZ. As shown in Figure 4.17-3 and as discussed under Section 4.17.1.d., *Wildfire Hazard Designations,* several housing sites and additional parcels are located in FHSZs.

The City of Pacific Grove is a developed area with urban land uses and interspersed vegetation. As discussed above, the city is characterized by gently sloping topography (with relatively small portions of the City containing slopes over 30 percent), with mountainous terrain located immediately southeast of the city. Prevailing winds primarily originate from the west and northwest (over the Pacific Ocean). The city has no history of wildfire.

The proposed project is a policy document that facilitates the development of housing in the city through 2031. As described in Chapter 2, *Project Description*, the project is intended to focus development on the identified housing sites and additional parcels, which are mostly surrounded by existing development and infrastructure, with the exception of the southwestern parts of the city, including Sites 50 and 55, which are adjacent on one side to undeveloped areas immediately southwest of the city boundary. Sites 50 and 55 are also in the mapped WUI area, and thus, development on these sites would be required to comply with additional regulations and standards from the CBC which are specified for development within the WUI (as described in Section 4.17.2, *Regulatory Setting*). Development facilitated by the project would be considered infill. The City would evaluate development facilitated by the project on a project-specific basis for wildfire safety, including the exposure of occupants to pollutants from wildfires.

Wildfire smoke produced from combustion of natural biomass contains thousands of individual compounds, including particulate matter, CO_2, water vapor, CO, hydrocarbons and other organic chemicals, NO_x, and trace minerals that can be carried by the wind. The city has gently sloping topography where wildfire risk is generally low due to limited vegetation within Pacific Grove. Prevailing winds from the west, originating from the Pacific Ocean, would generally push potential wildfire and smoke away from the city, reducing the likelihood of exposure to pollutant concentrations from a wildfire. While wind patterns shift to originate from the east between November and April, which could blow smoke originating from inland fires toward the project area, this occurs outside of the typical fire season when conditions are cooler and wetter, further limiting risk of pollutant exposure from wildfire smoke. Additionally, the presence of urban development, including established roads, maintained green spaces, and the Pacific Grove Golf Links, provide natural fire breaks that reduce the potential for fire spread.

The proposed project would allow higher-density residential development in certain areas of the city, including on sites in mapped Very High FHSZs; however, these sites (Sites 55, 57, A3, A4, and the Forest Hill District Sites) are not located in areas of steep slopes or in areas where prevailing winds are expected to contribute to wildfire spread into the city. Sites 55, 57, and the Forest Hill

District Sites are currently developed with commercial structures, and Sites A3 and A4 are currently vacant. The proposed project would facilitate increased density of development, with up to 61 residential units on Site 55, up to 6 residential units on Site 57, 1 residential unit on Site A3, 1 residential unit on Site A4, and 347 residential units in the Forst Hill District Sites. The proposed increase in housing density would result in a higher number of residents present in areas with some wildfire risk; however, the absence of steep terrain, as shown in Figure 4.17-2, and prevailing winds that would generally blow wildfire smoke away from the city reduces the likelihood that development facilitated by the project would exacerbate wildfire hazards or increase exposure to wildfire-related pollutants. MFD enforces fire and building codes related to development in Very High FHSZs, as well as throughout the city, ensuring that all new construction and redevelopment projects meet fire safety standards. The southeastern portion of the Forest Hill District, Site 57, and additional parcels A3 through A9 are located within a Very High FHSZ. Applicable fire safety standards include vegetation management, pre-fire management and planning, fuel modification, and brush clearance. Preliminary fire protection plans, landscaping and/or fuel modification plans are also required for projects in a Very High FHSZ and areas classified as Hazardous Fire Area or WUI.

The Dennett, Sinex, and Grove Acre Neighborhood; Sunset Commercial District; Neighborhood Commercial District; Forest Hill Commercial District; Presidio-Austin Commercial District; and various sites throughout the City are located in mapped WUI areas. However, these Districts, Neighborhoods, and sites are already developed or surrounded by existing development, and are not located adjacent to and do not contain steep slopes that would exacerbate fire hazards and exposures to pollutants. The project would facilitate additional housing development in areas that either contain or are surrounded by existing development; therefore, the project would not substantially increase the severity of wildfire risk exposure beyond those associated with existing conditions.

Future development facilitated by the project would also be required to adhere to state and federal regulations related to wildfire. This includes approval of plans and specifications to verify compliance with applicable codes, including the following:

- Title 24, CCR, Building Regulations
- International Fire Code/California Fire Code
- National Fire Codes of the National Fire Protection Association
- Title 19, CCR, Public Safety
- Title 8, CCR, Occupational Safety
- California Health and Safety Code

The CFC includes safety measures that minimize the threat of fire, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system, and sealing any gaps around doors, windows, eaves and vents to prevent intrusion by flame or embers. Development would also be required to meet CBC requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. CCR Title 14 sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards risk. Development within WUI areas would also be required to comply with CFC Title 24, Part 9 (Chapter 49), which provides mitigation strategies to reduce the hazards of fire originating within a structure to spread to wildlands, and fire originating in wildlands

to spread to structures through development and implementation of fire protection plans, landscape plans, long-term vegetation management, and creation and maintenance of defensible space. Compliance with these regulations and building standards would reduce the risk of exposing people to pollutants in or near developments facilitated by the proposed project.

The City would evaluate development facilitated by the project to ensure the minimization of risks associated with wildfire, including the potential for development to exacerbate wildfire risk due to slope or prevailing winds. Compliance with state and federal regulations and fire and building codes enforced by MFD would ensure that the proposed project would not exacerbate wildfire risk due to slope or prevailing winds, which could expose occupants to substantial pollutant concentrations or the uncontrolled spread of a wildfire. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

Impact W-3 THE PROPOSED PROJECT WOULD NOT REQUIRE THE INSTALLATION OR MAINTENANCE OF SUBSTANTIAL INFRASTRUCTURE THAT MAY EXACERBATE FIRE RISK OR RESULT IN TEMPORARY OR ONGOING IMPACTS TO THE ENVIRONMENT ASSOCIATED WITH FIRE RISK. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As described in Chapter 2, *Project Description*, the proposed project emphasizes mixed-use and infill development in existing urban parts of the project area. The project area does not contain large tracts of vegetation cover and already contains existing utility infrastructure. As a result, minimal additional infrastructure, such as roads, fuel breaks, emergency water sources, power lines, or other utilities, is anticipated to be required to accommodate development facilitated by the project. Development facilitated by the proposed project would primarily require lateral infrastructure connections to existing utilities, if such a connection does not already exist, resulting in negligible temporary or ongoing environmental impacts as the ground disturbance from such connections would be limited to individual parcels and adjacent rights-of-way. The utility infrastructure that poses the greatest potential wildfire risk is electrical lines. Existing electrical lines, whether aboveground or underground, vary by location and are maintained in accordance with CPUC requirements and new utilities, including electrical lines, associated with new development would be underground, pursuant to Section 18.21.010 of the City's Municipal Code.

The southeastern portion of the Forest Hill District, Site 57, and additional parcels A3 through A9 are located with a Very High FHSZ, and several other sites are adjacent to the Very High FHSZ. However, there is already existing roadway and utility infrastructure at these sites; therefore, future development in these sites would not introduce new infrastructure in a Very High FHSZ that could exacerbate wildfire risk. Accordingly, the proposed project would not exacerbate fire risk from the installation of electrical lines.

Future development would also be reviewed for consistency with the goals and policies of the Health and Safety Element, which are listed above under "Health and Safety Element" in Section 4.13.2, *Regulatory Setting.* In particular, Policies 13, 14, 16, and 17 require new

development to incorporate fire safety infrastructure, including roads, fire hydrants, and adequate water fire-flow, preventing infrastructure-related fire hazards. Policy 19 and its associated programs (S, T, and U), enforce vegetation management and fuel reduction efforts, limiting the potential for infrastructure, such as power lines or roads, to contribute to fire spread. Fire equipment access and response efficiency are reinforced by Policies 22 and 23, which maintain fire apparatus performance and emergency medical services, ensuring quick and effective responses to fire incidents. Collectively, these policies ensure that the installation or maintenance of infrastructure in fire hazard zones does not exacerbate fire risks or result in ongoing environmental impacts. Further, the project involves updates and revisions to the City's General Plan Health and Safety Element to include background information and maps to reflect existing conditions, identification of evacuation routes and capacity, and revised policies related to climate change, fire hazards, flooding, and emergency response.

The proposed project would facilitate urban and infill development that requires minimal additional utility infrastructure, and the proposed updated Health and Safety Element would ensure development facilitated by the proposed project would not exacerbate fire risk. Therefore, impacts to fire risks associated with the installation or maintenance of associated infrastructure would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 4:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact W-4 THE PROPOSED PROJECT'S UPDATED HEALTH AND SAFETY ELEMENT INCLUDES WILDFIRE RESILIENCY POLICIES TO ENSURE DEVELOPMENT WOULD NOT EXACERBATE RISKS FROM DOWNSTREAM FLOODING OR LANDSLIDES DUE TO WILDFIRE. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Vegetation on hillslopes helps to stabilize soil, slow water flow, and support percolation into the soil. Severe wildfires damage trees, the shrub canopy, vegetation, and soil. Once vegetation burns, a greater surface area of soil is exposed to the elements, and the lack of roots decreases the structural integrity of the soil. Thus, wildfire burn areas typically endure an increased runoff after intense rainfall, which can put residences and structures downslope of a burned area at risk of localized floods and landslides. Although the southeastern portion of the Forest Hill District, Site 57, and additional parcels A3 through A9 are located with a Very High FHSZ, they are not near steep slopes (as shown in Figure 4.17-2) that would be likely to experience downstream flooding, landslides, or other post-fire hazards related to runoff, slope instability, or drainage changes.

As discussed in Section 4.9, *Hydrology and Water Quality,* future development facilitated by the proposed project would be required to conform to design requirements associated with proper site preparation and grading practices and would implement surface drainage improvements and erosion control measures as well as construction best management practices (BMP). Construction BMPs would be implemented during grading operations, as required by Pacific Grove Municipal Code Section 9.30.130, to stabilize graded slopes and prevent excessive runoff and erosion.

As discussed in Section 4.6, *Geology and Soils*, the project area's risk of landslide is low. Runoff from individual sites would be managed through the implementation of project-specific Stormwater

Pollution Prevention Plans and BMPs designed to control water flow and prevent erosion. Root systems help to prevent shallow substrate mass movement. Thick roots behave similarly to soil nails, while thin roots act in tension during slope failure, dissipating the energy and potential inundation extent of mass movement (Stokes et al., 2009). Native vegetation in the project area, including Monterey pine, Monterey cypress, and coast live oak, is well-adapted to local conditions and can contribute to stabilizing slopes over time. In areas where natural vegetation communities occur, such as George Washington Park, Rip Van Winkle Open Space, and the margins of certain housing sites, the establishment and maintenance of native vegetation can help mitigate erosion and slope instability.

Future development would also be reviewed for consistency with the goals and policies of the Health and Safety Element, which are listed above under "Health and Safety Element" in Section 4.13.2, *Regulatory Setting*. Specifically, implementation of Policies 13, 14, 16, 17, 19, and 22 would result in the reduction in wildfire ignitions and spread of wildfire, thereby reducing the burn areas subject to post fire debris flows. Furthermore, development would be required to implement BMPs to minimize stormwater flows which would minimize adverse impacts of flooding following a wildfire. Further, the project involves updates and revisions to the City's General Plan Health and Safety Element, to include background information and maps to reflect existing conditions, identification of evacuation routes and capacity, and revised policies related to climate change, fire hazards, flooding, and emergency response.

The project would facilitate infill and mixed-use development in urbanized areas of Pacific Grove that contain gentle slopes and are not located near steep hillsides, in areas with minimal exposure to flooding, landslides, and other post-fire hazards. Required site preparation, grading, drainage improvements, and BMPs, including those outlined in future project-specific stormwater pollution prevention plans, would manage stormwater runoff and reduce the risk of erosion and debris flows following a wildfire. Additionally, the updated Health and Safety Element would mandate wildfire resiliency measures to reduce fire ignition and spread, further minimizing potential post-fire impacts, resulting in a less-than-significant impact.

Mitigation Measures

No mitigation measures are required.

4.17.4 Cumulative Impacts

The geographic scope for cumulative wildfire impacts is the Monterey peninsula, including the entirety of Pacific Grove, adjacent unincorporated areas (including the Del Monte Forest and Pebble Beach), and the City of Monterey. This geographic scope is appropriate because it encompasses areas where wildfire risks, including factors like regional climate conditions and emergency response capabilities, which influence fire behavior and spread. Emergency response resources, evacuation routes, and fire prevention strategies are often coordinated across jurisdictions within this region, meaning cumulative impacts would be experienced at this broader scale. Additionally, there are substantial fire breaks in the vicinity of Pacific Grove, such as State Route 1 and developed urban areas, such as Pacific Grove, Monterey, and Carmel-by-the-Sea, which would prevent the spread of potential wildfires in the vicinity of this geographic scope. Regional cumulative impacts consider impacts that would occur from the buildout of cumulative planning documents and reasonably anticipated projects identified in Chapter 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this DEIR is discussed in Chapter 3, *Environmental Setting*.

Cumulative development would have limited, site-specific impacts on adopted emergency response plans or emergency evacuation plans within the Monterey Peninsula. Cumulative development would be required to comply with state and local fire safety regulations, which reduce fire risks to the extent feasible, and would be reviewed by the local jurisdiction and local fire department for adequate emergency access. Compliance with state and local fire safety regulations would minimize impacts by requiring fire-resistant building materials, defensible space, and adequate emergency infrastructure. Additionally, local jurisdiction and fire department review would ensure proper emergency access and unobstructed evacuation routes, collectively reducing fire risks and maintaining the effectiveness of emergency response plans. Cumulative impacts related to the impairment of an adopted emergency response plan or emergency evacuation plan (Threshold 1) would be less than significant.

Cumulative development located on sites with steep slopes or on sites expected to be downwind of potential nearby wildfires would have the potential to exacerbate wildfire risks and exposure to pollutant concentrations. Cumulative development would be required to adhere to applicable development regulations and General Plan policies and discretionary projects would undergo environmental as well as design review. Cumulative development would also be required to adhere to applicable fire code requirements, in addition to health and safety code requirements. Compliance with existing regulations would establish requirements for defensible space, fire-resistant materials, and vegetation management to reduce fire spread, and health and safety regulations that ensure safe evacuation routes and structural integrity during wildfires. Environmental and design reviews would assess site-specific conditions, such as slope and wind patterns, ensuring that development avoids or mitigates hazardous areas and implements measures like proper grading, drainage, and fire suppression systems to further reduce wildfire risks. Therefore, cumulative impacts related to exacerbating wildfire risks due to slope, prevailing winds, or other factors (Threshold 2) would not be significant.

Cumulative development has the potential to exacerbate wildfire risks through the installation or maintenance of associated infrastructure. However, cumulative development would be required to adhere to applicable development regulations and General Plan policies, undergo design review, and undergo environmental review where required. These reviews would ensure that infrastructure is properly sited, constructed with fire-resistant materials, and includes fire mitigation strategies, reducing the potential for wildfire impacts and the General Plan policies would ensure infrastructure is designed with fire prevention measures. With these considerations prior to project approval, cumulative impacts related to the installation and maintenance of associated infrastructure (Threshold 3) would be less than significant.

Cumulative development has the potential to expose people or structures to significant risks associated with downslope or downstream flooding, landslides, and post-fire slope instability. However, cumulative development would be subject to applicable development regulations, General Plan policies, and environmental review processes for discretionary projects. Cumulative development would also be required to incorporate appropriate drainage and slope stabilization measures, associated with the applicable jurisdiction's municipal code requirements, which would minimize risks associated with runoff and slope instability. Therefore, cumulative impacts related to downstream flooding or landslides (Threshold 4) would be less than significant.

4.18 Effects Found Not to Be Significant

During evaluation of the proposed project, certain impact areas included in the *CEQA Guidelines* Appendix G checklist were found to have a less than significant impact or no impact. As allowed under *CEQA Guidelines* Section 15128, this section discusses why the project would have a less-than-significant impact or no impact to these environmental topics and therefore are not discussed in detail in the DEIR as individual sections.

4.18.1 Agriculture and Forestry Resources

Based on Appendix G of the *CEQA Guidelines,* the project would have a significant impact on agricultural and forestry resources if it would:

1. 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;
2. Conflict with existing zoning for agricultural use, or a Williamson Act Contract;
3. 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]);
4. Result in the loss of forest land or conversion of forest land to non-forest use; and/or
5. 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.

Based on the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program, the city is mapped primarily as Urban and Built-Up land, with some small areas of Other Land (DOC 2022). The city does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would not have the potential to directly or indirectly convert Farmland to non-agricultural use.

The project area within Pacific Grove is entirely urbanized, with no land designated or zoned for rural or agricultural use or enrolled in a Williamson Act Contract (DOC 2025). Therefore, the proposed project would not conflict with existing zoning for agricultural uses.

The City does not have any forest land, timberland, or timberland zoned Timberland Production. Therefore, the proposed project would not conflict with existing zoning or cause rezoning of forest land or land zoned for timberland production, and would not result in the loss of forest land or conversion of forest land to non-forest land. Therefore, there would be no impact.

4.18.2 Mineral Resources

Based on Appendix G of the *CEQA Guidelines,* the project would have a significant impact on mineral resources if it would:

1. 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; and/or
2. 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.

There is one historic mining site in the project area, but it is no longer in operation (United States Geological Survey 2023). According to the City's General Plan land use and zoning maps, the City does not maintain any land use designations that allow mineral extraction. Implementation of the proposed project would not result in land use changes that preclude mineral extraction in industrial districts and would not result in development in areas with known mineral resources. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or the loss of availability of a locally important mineral resource recovery site. No impact would occur.

5 Other CEQA-Required Discussions

This chapter discusses other issues as required by CEQA, in addition to the specific issue areas discussed in Chapter 4, *Environmental Impact Analysis*. These additional issues include the proposed project's potential to induce growth, create significant and irreversible impacts on the environment, and significant environmental effects that cannot be avoided if the proposed project is implemented.

5.1 Growth Inducement

CEQA Guidelines Section 15126(d) requires a discussion of a project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. A project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population and Economic Growth

This DEIR identifies a maximum buildout for the project, which is a conservative assumption developed for this analysis. Overall, maximum growth is dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. As discussed in Chapter 2, *Project Description*, in a maximum growth scenario, the proposed project is anticipated to facilitate development of up to approximately 2,335 new housing units. As discussed in Section 4.12, *Population and Housing,* based on Pacific Grove's average household size of 2.12 persons, the proposed project could lead to an increase of approximately 4,950 residents in the city, increasing Pacific Grove's total population to 19,916 people. This population increase would exceed the Association of Monterey Bay Area Governments' (AMBAG's) 2031 population forecast of 15,259 residents. Therefore, the proposed project may result in substantial population growth in the area. The AMBAG 2026 Regional Growth Forecast does not take into account the 6th Cycle Regional Housing Needs Allocation, but the Regional Growth Forecast accommodates the increase in housing units mandated by the 6th Cycle Regional Housing Needs Allocation in order for AMBAG to meet the state's statutory requirement. Although the project would facilitate development beyond what is forecast for the city in the AMBAG 2026 Regional Growth Forecast, the Regional Growth Forecast will be updated in future years to reflect new forecasts for each city in the region. In addition, implementation of policies and associated programs included in the proposed project would assist to manage growth such that development and redevelopment would occur in an orderly manner. These policies include the following:

Land Use Element

Goal LU-1: Provide for orderly, well-planned, and balanced development consistent with the historic nature of Pacific Grove, the capacity of the City's infrastructure, and ability to assimilate new growth.

Intent: Provide for orderly, well-planned, and balanced development consistent with the historic nature of Pacific Grove, the capacity of the City's infrastructure, and ability to assimilate new growth.

Policy: **Balanced land uses.** Maintain a land use pattern to support a broad range of housing choices, retail businesses, employment opportunities, educational and other supportive services.

Programs. Provide balanced land uses through implementation of program below:

- **Program A.** Continue to regulate the intensity of uses in commercial zones and maintain the underlying distinctions of each commercial area.
- **Program B.** Consider revising development standards, including height and setback requirements, in mixed-use and multi-family residential zones, where medium and high residential densities are allowed in order to achieve maximum density
- **Program C.** Consider including floor area ratios (FARs) in the zoning regulations for residential areas.
- **Program D.** Review and identify development standards that may be revised to allow for greater flexibility in developing varied housing types at a range of densities.
- **Program E.** Require land divisions within, or immediately adjacent to, environmentally sensitive habitat to keep development intensity as low as possible immediately adjacent to the sensitive habitat
- **Program F.** Ensure that zoning, licensing, enforcement, and other controls are adequate to fairly govern the supplemental use of residential properties for business purposes.

Goal LU-5: Enhance and preserve the unique historical character of Downtown while supporting increased development intensity and mixed uses.

Intent: To create a unified city where identified housing sites does not diminish or ignore the existing city fabric, but rather reinforces and expands upon it.

Policies: **Visual connections.** Provide visual connections, between existing development and new development through design and planning.

Programs. Enhance and preserve Downtown while supporting increased development intensity and mixed uses carried out by the programs below:

- **Program Q.** Review and revise development and design guidelines for projects in the Downtown business district and find ways to encourage good design.
- **Program R.** Prepare a detailed plan for preserving the character of Downtown while enhancing its efficiency, economic vitality, and appearance.

- **Program S.** Maintain Downtown street lights and ensure fixtures are energy-efficient and in working condition.
- **Program T.** Consider establishing separate building standards for Downtown parcels fronting on Lighthouse Avenue and for parcels fronting on side streets.
- **Program U.** Support implementation of the mixed commercial/ residential use of the former Holman's block.

Goal LU-6: Encourage compatible mixed-use development allowing the city to achieve long-term housing and economic goals

Intent: To encourage development towards a diverse community that balances residential, commercial, and industrial uses, supporting long-term housing in tandem with economic growth.

Implementation of the above goals and policies would facilitate orderly development in Pacific Grove by promoting a balanced and well-planned approach that respects the city's historic nature and infrastructure capacity. Goal LU-1 emphasizes maintaining a diverse land use pattern, supporting various housing options, businesses, and services, while regulating commercial zone intensities and revising development standards to maximize density where appropriate. Programs that involve regulating land divisions near sensitive habitats and ensuring fair governance of residential properties for business use further contribute to balanced growth. Together, these goals and policies create a framework for sustainable and orderly development that integrates new growth with the existing city fabric.

The project is anticipated to facilitate development of up to approximately 292,578 square feet of commercial uses, which would add an estimated 400 employees to the city. The project would also generate temporary employment opportunities during construction of future development facilitated by the project. Because individual development projects facilitated by the project would be relatively small in size and construction duration, construction workers would be expected to be drawn from the existing regional work force. As such, construction of future development projects would not be growth-inducing from a temporary employment standpoint. In addition, since much of Pacific Grove is currently developed and used for residential, commercial, and various other uses, implementation of the proposed project would facilitate redevelopment or development areas already served by existing infrastructure and public services. Accordingly, growth facilitated by the project could be substantial but would not be "unplanned." As discussed in Chapter 2, *Project Description*, the proposed project's vision for the City was developed with community input and in recognition of the state's planning priorities. Because the proposed project is designed for orderly growth, as mandated by the state, the proposed project would not result in substantial impacts related to population and economic growth.

5.1.2 Removal of Obstacles to Growth

Development facilitated by the proposed project would require new utility connections, including water, wastewater, stormwater, electrical, and telecommunications. Most housing sites, upzoning areas, and additional parcels are located in previously developed areas where existing infrastructure, including roads, water mains, and sewer mains are present. Utility connections would generally occur within individual footprints or rights-of-way that were previously disturbed, minimizing the impact of development on existing infrastructure and services. Development could use existing facilities, and major infrastructure extensions would not occur in or be designed to

serve areas beyond the sites analyzed in this DEIR. Accordingly, the proposed project would not result in significant growth inducement due to the removal of an obstacle to growth.

5.2 Irreversible Environmental Effects

CEQA Guidelines Section 15126(c) requires a discussion of significant irreversible environmental changes that could result from the project, should the project be implemented. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, environmental accidents, and irreversible impacts associated with the proposed project.

The proposed project could irreversibly increase local demand for non-renewable energy resources such as petroleum products and potentially natural gas. However, increasingly efficient building design could offset this demand to some degree by reducing energy demands of future development. As described in Section 4.5, *Energy,* development facilitated by the proposed project would be subject to the energy conservation requirements of the California Energy Code (California Code of Regulations Title 24, Part 6) and CALGreen (California Code of Regulations Title 24, Part 11). The California Energy Code provides energy conservation standards for all new and renovated buildings, and CALGreen requires solar access, natural ventilation, and stormwater capture. Consequently, development facilitated by the proposed project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and renewable resources would be less than significant. Consumption of these resources would occur with any development in the region and is not unique to the proposed project.

Growth facilitated by the proposed project could require an irreversible commitment of fire protection, law enforcement, water supply, wastewater treatment, and solid waste disposal services. As discussed in Section 4.13, *Public Services and Recreation*, and Section 4.16, *Utilities and Service Systems,* however, potential impacts to public services and utilities and service systems would be less than significant following implementation of existing Pacific Grove General Plan policies, policies proposed by the project, as well as future project-specific environmental review that would be required for any future public service or utility facility constructed in accordance with the proposed project.

The anticipated increase in buildout associated with the proposed project could contribute to greenhouse gas (GHG) emissions. As described in Section 4.7, *Greenhouse Gas Emissions,* the proposed project would result in cumulatively considerable impact related to GHG emissions. Although Mitigation Measure GHG-1 would incorporate all-electric buildings and EV charging infrastructure consistent with the 2022 Scoping Plan to the extent feasible, it cannot ensure that all development facilitated by the project would include these features. As a result, buildout facilitated by the project would result in an irreversible impact related to GHG emissions.

5.2.1 Significant Unavoidable Impacts

Section 15126.2(b) of the *CEQA Guidelines* requires that an EIR describe any significant impacts, including those that cannot be mitigated to less than significant levels, as a result of implementation of the project. The following environmental issues were determined to result in potential significant and unavoidable impacts:

- **Impact CUL-1:** Development facilitated by the project has the potential to cause adverse changes to the significance of historical resources. Impacts would be significant and unavoidable, despite compliance with applicable regulations. No mitigation would be feasible to avoid impacts.
- **Cultural Resources Cumulative Impact:** Buildout of both development facilitated by the project and cumulative projects could result in significant cumulative impacts to known and/or unknown historical resources. While impacts to such resources would be addressed on a case-by-case basis and would likely be subject to mitigation measures similar to those imposed for development facilitated by the project, cumulative development may result in the destruction of historical resources. As such, cumulative impacts to historical resources would be significant.
- **Impact GHG-1:** Construction and operation of the proposed project would generate GHG emissions, and the project would incorporate features that align with the goals of the applicable plans, policies, and regulations related to the reduction of GHG emissions. However, even with the implementation of Mitigation Measure GHG-1, individual projects could face challenges that hinder projects' ability to implement Mitigation Measure GHG-1 and thus would not be consistent with the 2022 Scoping Plan. Therefore, impacts would be significant and unavoidable.
- **GHG Cumulative Impact:** The proposed project would not be consistent with the policies of the 2022 Scoping Plan and applicable regional and local plans. Thus, based on the *CEQA Guidelines* for determining the significance of GHG emissions, the proposed project's contribution to cumulative GHG impacts would be considerable.
- **Impact NOI-1:** Construction of individual projects facilitated by the project would temporarily produce high noise levels, potentially affecting nearby noise-sensitive land uses. In addition, operation of development facilitated by the project would also result in increased transportation noise, and ambient noise could increase beyond standards established by the City's General Plan and municipal code. Impacts would be significant and unavoidable, despite the implementation of feasible mitigation.
- **Noise Cumulative Impact:** The project would substantially increase noise levels in the city which, in conjunction with cumulative development, would result in a cumulatively considerable increase in construction and operation noise.

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6 Alternatives

Section 15126.6 of the *CEQA Guidelines* provides guidance for the identification and evaluation of project alternatives in an EIR. The *CEQA Guidelines* state that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." This EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen significant adverse impacts.

6.1 Development of Alternatives

Section 15126.6(c) of the *CEQA Guidelines* requires that an EIR identify alternatives that were considered but rejected as infeasible and provide a brief explanation as to why such alternatives were not fully considered in the EIR. As required by the *CEQA Guidelines*, the selection of alternatives for this DEIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the proposed project, do not meet basic proposed project objectives, or are not feasible to implement have been eliminated from further consideration. Alternatives that were considered but rejected are discussed below in Section 6.1.3.

6.1.1 Project Objectives

As discussed in Chapter 2, *Project Description,* the City identified the following objectives for the proposed project:

- Provide capacity to meet the state-required Regional Housing Needs Allocation (RHNA) for the 6th Cycle Housing Element planning period of 2023-2031, including providing a buffer of 20 percent of the remaining RHNA for lower-[1] and moderate-income units to ensure no net loss.
- Ensure that the growth facilitated by the Housing Element is achievable, through associated amendments to the Zoning Code and/or Land Use Element of the General Plan.
- Disperse housing sites throughout the City to ensure that no single neighborhood or area is overburdened or impacted.
- Preserve historic, single-family neighborhoods.
- Improve fair housing conditions in the city by implementing meaningful actions. Provide for fair and equal housing opportunities for all persons, regardless of protected characteristics, including but not limited to, age, ancestry, sex, gender, gender expression, sexual orientation, religion, disability, family status, race, creed, color, or national origin.
- Continue existing and develop new programs and policies to meet the projected affordable housing need of extremely low, very low, low, and moderate-income households.
- Bring the General Plan into conformance with recently enacted state housing law, including Assembly Bill (AB) 1398, AB 747, Senate Bill (SB) 99, and SB 379; as well as update the City's Health and Safety Element to meet state requirements for general plan safety elements.

[1] "Lower-income" includes both the very low and low income categories.

- Identify housing policies and programs that enable the development of additional units and the preservation of existing units, that reduce governmental constraints to building housing, and that affirmatively further fair housing.
- Encourage the development of by-right low-income housing for 6th Cycle housing sites proposed for rezoning and existing 4th and 5th Cycle housing sites that are reused in the 6th Cycle, increasing the overall availability of affordable housing.
- Identify appropriate housing sites and provide housing development opportunities in specified areas with the potential to accommodate additional housing or are proximate to jobs, transportation, shopping and schools, and the accompanying zoning required to accommodate housing development.

6.1.1 Potentially Significant Impacts of the Project

As discussed throughout Chapter 4, *Environmental Impact Analysis*, and summarized in Table ES-1 in the Executive Summary, the proposed project would result in significant and unavoidable impacts to cultural resources (historical resources and cumulative impacts to historical resources); greenhouse gas (GHG) emissions (inconsistency with the 2022 Scoping Plan and cumulative GHG emissions); and noise (ambient noise and cumulative noise impacts).

The project would require mitigation to reduce significant impacts related to air quality, biological resources, cultural resources, geology and soils, GHG emissions, noise, and utilities and service systems. Identified mitigation measures in Chapter 4 would reduce potentially significant impacts related to air quality, biological resources, cultural (archaeological) resources, geology and soils (paleontological resources), noise (vibration), and utilities and service systems to less than significant levels; impacts related to GHG emissions, and noise (ambient noise) would remain significant and unavoidable even with implementation of mitigation measures. No mitigation is available to reduce the significant impacts related to cultural resources (historic resources).

6.1.2 Alternatives Considered and Rejected

The *CEQA Guidelines* state that an EIR should identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination (*CEQA Guidelines* Section 15126.2(c)). Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii), infeasibility, or (iii) inability to avoid significant environmental impacts (*CEQA Guidelines* Section 15126.6(c)). The following sections describe potential alternatives to the project that were considered by the City but were rejected due to the infeasibility and/or their failure to meet most project objectives.

Housing Sites Located in Unclassified or Open Space Districts

The City considered locating some housing sites on parcels that are currently zoned as Unclassified or Open Space. Members of the public who submitted comments on the Notice of Preparation during the DEIR scoping period also suggested locating housing sites within school properties, which are zoned as Unclassified. Residential land uses are not permitted in Unclassified or Open Space districts; absent state law pre-empting local zoning initiatives for housing to be developed on these parcels, the parcels would require rezoning to an applicable residential district. Pursuant to Pacific Grove Municipal Code Sections 23.42.030 and 23.44.040, rezoning a property zoned as Open Space or Unclassified requires approval by Pacific Grove voters. This was identified as a constraint,

because if the voters fail to approve an ordinance rezoning these parcels, housing could not be developed on these sites. Since it cannot be guaranteed that housing could be facilitated on these sites, this alternative is potentially infeasible. Accordingly, the City determined that housing sites in Unclassified or Open Space zones could not be relied upon to meet the City's RHNA, and this alternative would fail to meet the project's first objective to provide capacity to meet the State-required RHNA for the 6th Cycle Housing Element planning period of 2023-2031. This alternative would also fail to meet several project objectives as it would not ensure growth facilitated by the Housing Element is achievable and would not identify housing sites with the accompanying zoning required to accommodate housing development. Therefore, the City rejected this alternative from further consideration in the DEIR.

Additional Housing Sites in the Coastal Zone

The proposed project includes five housing sites located in the Coastal Zone (Sites 10, 11, 12, 19, and 56, as shown in Figure 2-7 and Figure 2-10 in Chapter 2, *Project Description*). The City considered locating a greater number of housing sites in the Coastal Zone, and allowing greater density in these housing sites compared to what is currently allowed. However, increasing the density of parcels located in the Coastal Zone would require amending the City's Local Coastal Program and obtaining approval from the California Coastal Commission. This was identified as a constraint, because if the California Coastal Commission did not approve increased densities for housing sites in the Coastal Zone, less housing could be developed on these sites and the City may not meet its RHNA. The actions of the California Coastal Commission are outside of the City's control, and because it cannot be guaranteed that housing could be facilitated on these sites, this alternative is potentially infeasible. Accordingly, the City determined that increasing density of housing sites in the Coastal Zone could not be relied upon to meet the City's RHNA, and this alternative would fail to meet the project's first objective to provide capacity to meet the State-required RHNA for the 6th Cycle Housing Element planning period of 2023-2031. This alternative would also fail to meet several other project objectives as it would not ensure growth facilitated by the Housing Element is achievable and would not identify housing sites with the accompanying zoning required to accommodate housing development. Therefore, the City rejected this alternative from further consideration in the DEIR.

Electrification

As discussed in Section 4.7, *Greenhouse Gas Emissions,* the project would achieve some 2022 Scoping Plan key project attributes, such as vehicle miles traveled (VMT) reduction, no loss or conversion of natural and working lands, and provision of affordable housing. However, the development facilitated by the project may exclude electric vehicle (EV) chargers and/or use natural gas as an energy source, both of which would conflict with the Transportation Electrification and Building Decarbonization key project attributes identified in the 2022 Scoping Plan. As concluded in Section 4.7, *Greenhouse Gas Emissions,* the project's conflicts with the 2022 Scoping Plan would result in significant and unavoidable impacts related to GHG emissions.

The City considered an alternative involving a restriction on the use of natural gas in future development, to avoid significant impacts related to GHG emissions. However, as discussed in Section 4.7, *Greenhouse Gas Emissions,* revisions to the Building Code may be required to fully implement and enforce all-electric building requirements. Revisions to the Building Code including requirements for all-electric building design cannot be guaranteed; in particular, the Ninth Circuit Court of Appeals, in *California Restaurant Association v. City of* Berkeley (2024) 89 F.4th 1094 limited

a jurisdiction's ability to prohibit natural gas hook-ups for new development. Though there is no legal constraint to encouraging all electric development and design through policy and building code requirements, there may be some instances where mandatory electric building features are infeasible. Because all-electric building design cannot be guaranteed, the City rejected this alternative from further consideration in the DEIR.

Reduced Development Alternatives that Would not Meet the Regional Housing Needs Allocation

The City considered several potential alternatives that would involve reduced development compared to the proposed project, including alternatives that would involve decreased housing density across all identified sites and alternatives that would eliminate some of the housing sites from consideration. As discussed in Chapter 2, *Project Description*, a housing element must address the City's fair share of the regional housing need and identify sufficient housing sites to cover the jurisdiction's 6th Cycle RHNA. Accordingly, an alternative that does not include sufficient housing sites and housing density to meet the RHNA would result in non-compliance with State housing law and therefore be legally infeasible. Therefore, when considering potential reduced development alternatives, the City rejected any alternatives from further consideration in the DEIR that would not result in sufficient housing sites or density to meet the RHNA. As discussed below in Sections 6.3 and 6.4, the City considered alternatives that involve a reduced level of development yet still have sufficient housing sites and density to meet the RHNA.

6.1.3 Project Alternatives

CEQA Guidelines Section 15126.6(a) states that "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." The selected alternatives are limited to those that would avoid or substantially lessen any of the significant effects of the proposed project, that the lead agency determines to be potentially feasible, and that could feasibly attain most of the basic objectives of the proposed project. This section presents the selected alternatives and includes an evaluation for the environmental topics addressed in Sections 4.1 to 4.17, although at a more general level to compare the merits of the alternatives to the proposed project (consistent with *CEQA Guidelines* Section 15126.6(d)).

This analysis presents three alternatives, including the required No Project Alternative and two alternatives that involve changes to the proposed project that may reduce the project-related environmental impacts identified in this DEIR. The following alternatives are evaluated in this DEIR:

- Alternative 1: No Project
- Alternative 2: Reduced Density
- Alternative 3: Fewer Sites

Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.2 through 6.4. As required by CEQA, this section also includes a discussion of the "environmentally superior alternative" among those studied, included in Section 6.5. Table 6-1 provides a comparison of the buildout characteristics of the project and of each of the alternatives considered.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

	Proposed Project	Alternative 1: No Project[1]	Alternative 2: Reduced Density	Alternative 3: Fewer Sites
Total allowable housing units under alternative	2,335	356	991	991
Change in total maximum housing units compared to the proposed project	n/a	-1,979	-1,344	-1,344
Total additional residents under alternative	4,950	755[2]	2,101[3]	2,101[3]
Change in population compared to the proposed project	n/a	-4,195	-2,849	-2,849
Total additional jobs under alternative	400	273	200[4]	200[4]
Change in jobs compared to the proposed project	n/a	-127	-200	-200

[1] Refer to Section 4.12, *Population and Housing,* for information on projected population, housing, and employment in Pacific Grove by 2031 with and without the project.

[2] 356 housing units multiplied by an average of 2.12 persons per household (California Department of Finance 2024) equals approximately 755 people. As discussed in Section 4.12, *Population and Housing,* the total additional residents that the Association of Monterey Bay Area Governments projects to occur by 2031 is 293. However, for consistency across alternative analyses, the total additional residents under each alternative is determined by multiplying the total allowable housing units by the average number of persons per household.

[3] 991 housing units multiplied by an average of 2.12 persons per household (California Department of Finance 2024) equals approximately 2,101 people.

[4] Alternative 2 and Alternative 3 would involve the minimum amount of density increases or the minimum number of housing sites, respectively, to accommodate a minimum number of housing units needed to meet the RHNA. Accordingly, both alternatives would involve reduced density increases and a reduced number of sites that could accommodate development. Therefore, it is assumed that both alternatives would involve a 50 percent reduction of potential commercial development.

6.2 Alternative 1: No Project

6.2.1 Description

The *CEQA Guidelines* (Section 15126.6(e)(2)) require that the alternatives discussion include an analysis of a No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the project was not approved, based on current plans and consistent with available infrastructure and community services. The No Project Alternative typically will proceed along one of two lines: (1) when a project is a revision of an existing regulatory plan or policy, the No Project Alternative will be the continuation of the existing plan or policy; or (b) if a project is a development project on identifiable property, the No Project Alternative is the circumstance under which the project does not proceed.

In this case, the No Project Alternative assumes that the Housing Element Update, zoning amendments, and General Plan amendments are not adopted or implemented, and that there is no change in zoning or density for the housing sites, upzoning areas, and additional parcels identified by the project. Current uses on the sites would continue under this alternative, with future full

buildout in these sites limited by existing housing policies, zoning, and allowable density. Buildout of the housing sites, upzoning areas, and additional parcels under existing zoning would allow for up to 356 total housing units and a population increase of approximately 755 people (refer to Table 6-1).

The No Project Alternative would also involve no changes to the City's Land Use Element or Health and Safety Element. No existing land use designations would change, and the Land Use Element would not be revised to increase density for several residential land use designations. The Health and Safety Element would not be revised to include updated background information and maps, identification of evacuation routes and capacity pursuant to AB 747 and SB 99, a climate change vulnerability assessment pursuant to SB 379, and revised policies pertaining to climate change, fire hazards, flooding, and emergency response and preparedness. Future growth and decision making in Pacific Grove would continue to be guided by existing Land Use and Health and Safety goals and policies. This alternative would not accomplish most of the project objectives, including: providing capacity to meet the State-required RHNA for the 6th Cycle Housing Element planning period of 2023-2031; ensuring that the growth facilitated by the Housing Element is achievable, through associated amendments to the Zoning Code and/or Land Use Element of the General Plan; improving fair housing conditions in the city by implementing meaningful actions; bringing the City's General Plan into conformance with recently enacted State law, including AB 747, SB 99, and SB 379; identifying housing policies and programs that enable the development of additional units; encouraging the development of by-right low-income housing for the 6th Cycle housing sites proposed for rezoning and existing 4th and 5th Cycle housing sites that are reused in the 6th Cycle, increasing the overall availability of affordable housing; or identifying appropriate housing sites and provide housing development opportunities in specified areas with the potential to accommodate additional housing or are proximate to jobs, transportation, shopping and schools. This alternative would meet the project objectives to preserve historic, single-family neighborhoods and to continue existing programs and policies related to affordable housing needs.

6.2.2 Impact Analysis

a. Aesthetics

Under the No Project Alternative, future development in Pacific Grove would continue to follow the existing land use pattern and would be guided by the existing General Plan. No new zoning changes would be implemented and proposed objective design standards would not be adopted. Consequently, the scale, intensity, and distribution of new development would be more limited compared to the proposed project.

Because this alternative would not facilitate the same level of housing growth or intensification of land uses as the proposed project, it would result in fewer changes to the built environment. As a result, potential impacts to scenic vistas, the City's established visual character, and light and glare conditions would be reduced. The visual landscape of Pacific Grove would remain more consistent with existing conditions, preserving the community's current aesthetic qualities.

Although development would still occur under the No Project Alternative, it would be subject to the goals, policies, and regulations that pertain to visual resources in the existing General Plan and in the Pacific Grove Municipal Code and would continue to undergo discretionary review, ensuring consistency with existing design and character.

Overall, aesthetic impacts under the No Project Alternative would be less than significant and generally reduced compared to those anticipated under the proposed project, due to the lower intensity of development.

b. Air Quality

Under the No Project Alternative, future development in Pacific Grove would continue to follow the existing land use pattern and would be guided by the existing General Plan. As shown in Table 6-1, the No Project Alternative would result in reduced buildout potential compared to the proposed project, as it would facilitate the development of 1,979 fewer housing units and the addition of 4,195 fewer people than the proposed project. In addition, development would generally be reduced in size and density compared to the proposed project. Therefore, Alternative 1 would involve less construction and less intense construction activities than the proposed project, and consequently less air pollutant emissions than the proposed project.

Section 4.2, *Air Quality,* conservatively estimates construction emissions for the proposed project by modeling a hypothetical individual sample project that includes 584 housing units and 73,145 square feet of commercial area. As shown in Table 6-1, the No Project Alternative would facilitate the development of 356 new housing units. In addition, this alternative would not facilitate new commercial development beyond what is currently envisioned by the existing General Plan. Therefore, the total amount of development facilitated under the No Project Alternative would be less than the total amount of development modeled in the hypothetical individual sample project.

As shown in Table 4.2-8 in Section 4.2, *Air Quality,* construction emissions associated with the sample individual project would not exceed Monterey Bay Air Resources District (MBARD) thresholds. Accordingly, even if all of the development possible under the No Project Alternative occurs in one year, construction emissions would not exceed MBARD thresholds. The No Project Alternative's impacts related to construction emissions would be less than significant and reduced compared to the proposed project.

Section 4.2, *Air Quality,* also conservatively estimates operational emissions for the proposed project with the same a hypothetical individual sample project. As shown in Table 4.2-10 in Section 4.2, *Air Quality,* operational emissions associated with the sample individual project would not exceed MBARD thresholds. As explained above, the total amount of development facilitated under the No Project Alternative would be less than the total amount of development modeled in the hypothetical individual sample project. Accordingly, the No Project Alternative's operational emissions would not exceed MBARD thresholds. The No Project Alternative's impacts related to operational emissions would be less than significant and reduced compared to the proposed project.

Although the overall amount of construction and operational emissions would be reduced under the No Project Alternative, development under the No Project Alternative may still occur proximate to sensitive receptors, and could result in the exposure of sensitive receptors to substantial pollutant concentrations. Future development under the No Project Alternative would be required to comply with MBARD rules and Pacific Grove Municipal Code regulations that intend to reduce pollutant emissions. In addition, if future development under the No Project Alternative is subject to CEQA, project-specific mitigation would be developed, as needed, further reducing potential emissions on a project-by-project basis.

Overall, air quality impacts under the No Project Alternative would be reduced compared to the proposed project, and would remain less than significant.

c. Biological Resources

Future development in Pacific Grove would continue to follow the existing land use pattern under the No Project Alternative, and development would generally be reduced in size and density compared to the proposed project. As discussed in Section 4.3, *Biological Resources,* most of the potential impacts to biological resources are associated with housing sites that are currently undeveloped, including Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4. Although these sites would not be upzoned to allow increased residential density under the No Project Alternative, these sites are currently zoned for residential uses and development would still be allowed on these sites under the No Project Alternative. Despite the reduced level of development, ground disturbance on these sites would occur to the same extent as the proposed project. As a result, impacts to known special-status species or their associated habitat, including through habitat modifications; impacts to sensitive Monterey pine communities and riparian habitat; and impacts to intermittent streams (present at Site 49 and additional parcels A3 and A4) would still occur to roughly the same degree as the proposed project.

As noted in Section 4.3, *Biological Resources,* once a site has been developed or re-developed, the proposed operational uses of individual sites would not result in substantial new operational impacts to special-status plants or wildlife beyond those occurring under existing baseline conditions. Similarly, operational impacts to riparian habitat, sensitive natural communities, and jurisdictional areas are nominal and less than significant. Thus, the reduced buildout associated with Alternative 1 would not measurably reduce operational impacts related to biological resources.

Development under the No Project Alternative would still be subject to federal, state, and local regulations pertaining to the protection of biological resources, as outlined in Section 4.3, *Biological Resources.* In addition, if future development under the No Project Alternative is subject to CEQA, project-specific mitigation would be developed, as needed, to address potential impacts to biological resources on a project-by-project basis. Given the biological resources present on Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4, it is anticipated that project-specific CEQA review would be required in these areas, and that mitigation measures similar to those identified for the proposed project would be required.

Overall, impacts to biological resources under the No Project Alternative would be similar to those under the proposed project due to the presence of sensitive resources on Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4. Impacts would remain less than significant with mitigation.

d. Cultural Resources

Under the No Project Alternative, future development in Pacific Grove would continue to follow the existing land use pattern established by the existing General Plan, with generally reduced size and density compared to the proposed project. The City would continue to implement its Guidelines for Historic Assessments, relevant General Plan policies, and municipal code provisions, which provide protections for historical resources. Development under this alternative would continue to comply with Pacific Grove Municipal Code Sections 23.76.080 and 23.70.070(h)(4)(A), which requires compliance with the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings.

Because this alternative would accommodate less new development overall, the likelihood of projects resulting in impacts to the significance of historic resources would be reduced. However, development would still occur, and some sites may contain or be adjacent to historical resources. As such, the potential for a project to result in a significant and unavoidable impact to historical resources, such as through substantial alteration of a historic structure, would still exist under the

No Project Alternative. Therefore, although the No Project Alternative would reduce the overall potential for such impacts compared to the proposed project, it would not eliminate the possibility that a future project could result in a significant and unavoidable impact.

Overall, although impacts to historical resources would be reduced compared to the proposed project, they would remain significant and unavoidable given the continuing potential for adverse changes to the significance of a historic resource.

Similar to the proposed project, the No Project Alternative would have the potential to adversely impact archaeological resources and human remains. Although overall development would be reduced under this alternative, ground disturbance could still occur throughout the city, and the potential to impact one of the 56 known archaeological resources in Pacific Grove would remain. The reduced scale of development would lower the overall likelihood of such impacts, but not eliminate them. As with the proposed project, any future development subject to CEQA would require project-specific environmental review, and mitigation measures would be developed as needed to address potential impacts to archaeological resources. Therefore, impacts under the No Project Alternative would be less than significant with mitigation, but would be reduced compared to the proposed project.

e. Energy

The No Project Alternative would facilitate the development of 1,979 fewer housing units than the proposed project, an 85 percent reduction. Accordingly, construction activities would generally be less intense under Alternative 1, and would require the consumption of less energy than the proposed project.

Section 4.5, *Energy,* conservatively estimates construction energy use for the proposed project by modeling a hypothetical individual sample project that includes 584 housing units and 73,145 square feet of commercial area, representing approximately 25 percent of total project buildout. As shown in Table 6-1, the No Project Alternative would facilitate the development of 356 new housing units. In addition, this alternative would not facilitate new commercial area beyond what is currently envisioned by the existing General Plan. Therefore, the total amount of development facilitated under the No Project Alternative would be less than the total amount of development modeled in the hypothetical individual sample project. Accordingly, energy use associated with the No Project Alternative would be less than one-quarter of energy use associated with the proposed project.

As described in Section 4.5, *Energy,* with adherence to state and local regulations, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Development under the No Project Alternative would be subject to the same state and local regulations, and given the substantial reduction in buildout and associated energy use during both construction and operation, this alternative similarly would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Overall, impacts would be reduced compared to the proposed project, and would remain less than significant.

f. Geology and Soils

The No Project Alternative would result in reduced buildout potential compared to the proposed project, accommodating 4,195 fewer residents and 1,979 fewer housing units than the proposed project. Thus, compared to the proposed project, the No Project Alternative would expose fewer

people and structures to geologic and seismic hazards. However, the No Project Alternative would not update the City's Health and Safety Element, including new and updated policies that identify and aim to avoid seismic and geologic hazards such as erosion, landslides, and groundshaking. Therefore, the No Project Alternative would fail to minimize risks related to seismic-related ground failure, soil instability, and seismic groundshaking to the same degree as the proposed project. Because the No Project Alternative would facilitate the development of 1,979 fewer housing units than the proposed project, 85 percent less than the proposed project, there would be substantially fewer people exposed to geologic and seismic hazards. This reduction in risk would outweigh the potential benefits of the revised Health and Safety Element policies that would be excluded from Alternative 1. Ultimately, the No Project Alternative's impacts related to geology and seismicity would be less than significant and reduced compared to the proposed project.

Future development under the No Project Alternative would have the potential to impact paleontological resources. However, this alternative would involve the construction of 1,979 fewer housing units, an 85 percent reduction compared to the proposed project. As such, this alternative would involve substantially less ground disturbing activities that may encounter paleontological resources. Therefore, the No Project Alternative would have less potential to directly or indirectly destroy a unique paleontological resource.

Although overall development would be reduced under this alternative, ground disturbance could still occur throughout the city, and the potential to impact paleontological resources would remain. As with the proposed project, any future development subject to CEQA would require project-specific environmental review, and mitigation measures would be developed as needed to address potential impacts to paleontological resources.

Overall, impacts to paleontological resources would be reduced compared to the proposed project, but would remain less than significant with mitigation.

g. Greenhouse Gas Emissions

As discussed in Section 4.7, *Greenhouse Gas Emissions,* potential impacts related to GHG emissions are assessed by determining if a project complies with adopted plans, programs, policies, and/or other regulatory strategies to reduce GHG emissions. Plans considered in this determination include the California Air Resources Board's 2022 Scoping Plan and the Association of Monterey Bay Area Governments (AMBAG) 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy. The No Project Alternative would result in substantially less development than the proposed project, as it would result in 1,979 fewer housing units than the proposed project, an 85 percent reduction. However, the No Project Alternative would not be consistent with GHG reduction strategies outlined in these plans.

The No Project Alternative would not facilitate the same level of infill housing or affordable housing as the proposed project. Further, as discussed under "n. Transportation," (and discussed further in Section 4.14, *Transportation,* and Appendix E), this alternative would result in a greater amount of VMT per capita compared to the proposed project due to a more dispersed development pattern, which would not concentrate housing near commercial areas, schools, or services. Infill development and reduced VMT are key components of the 2022 Scoping Plan, as discussed in Section 4.7, *Greenhouse Gas Emissions*. In addition, similar to the proposed project, development under the No Project Alternative could include natural gas service and may not include electric vehicle infrastructure. Electrifying buildings and transit are key project attributes identified in the 2022 Scoping Plan as critical to achieving the state's climate goals. As a result, the No Project

Alternative would be less consistent with the 2022 Scoping Plan's objectives than the proposed project.

Section 4.7, *Greenhouse Gas Emissions,* conservatively estimates GHG emissions for the proposed project by modeling a hypothetical individual sample project that includes 584 housing units and 73,145 square feet of commercial area, representing approximately 25 percent of total project buildout. As shown in Table 6-1, the No Project Alternative would facilitate the development of 356 new housing units. In addition, this alternative would not facilitate new commercial area beyond what is currently envisioned by the existing General Plan. Therefore, the total amount of development facilitated under the No Project Alternative would be less than the total amount of development modeled in the hypothetical individual sample project. Accordingly, GHG emissions associated with the No Project Alternative would be less than one-quarter of emissions associated with the proposed project.

Although the No Project Alternative would generate significantly fewer GHG emissions than the proposed project, quantified GHG emissions for the project are provided for informational purposes only. As discussed in Section 4.7, *Greenhouse Gas Emissions*, there is no adopted numerical threshold of significance for GHG emissions applicable to the project area. Therefore, the determination of impact significance is based on policy consistency rather than emissions volume. Accordingly, while the No Project Alternative would result in substantially lower GHG emissions due to reduced development, it would be less consistent with state and regional GHG reduction plans and policies. As such, the impact related to GHG emissions under the No Project Alternative would be considered significant and unavoidable, and greater than that of the proposed project.

h. Hazards and Hazardous Materials

Under the No Project Alternative, the existing land use designations in the existing General Plan would continue to guide development throughout Pacific Grove. Compared to the proposed project, this alternative would accommodate approximately 85 percent fewer new residents and housing units. As a result, the overall scale and intensity of development would be substantially reduced. This reduction in development would lower the potential for ground disturbance that could expose existing contaminated soils or hazardous materials, particularly in areas with a history of prior industrial or commercial use. It would also reduce the likelihood of releasing hazardous substances during activities such as demolition of older structures that may contain lead-based paint, asbestos, or other legacy contaminants. In addition, with fewer new residents and workers introduced to the area, the number of people potentially exposed to hazardous materials or environmental contamination would also be reduced.

Similar to the proposed project, development under the No Project Alternative would be required to comply with federal and state regulations, including but not limited to the Clean Air Act, the Comprehensive Environmental Response, Compensation, and Liability Act, the Toxic Substances Control Act, the California Health and Safety Code, the California Fire and Building Codes, and MBARD Rule 424, pertaining to the removal and disposal of asbestos-containing materials, polychlorinated biphenyls, and other hazardous materials. Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials during both construction and operation.

Overall, the No Project Alternative would result in a reduced potential for exposure to hazardous materials due to less development and fewer people introduced to the area. With compliance with existing regulations, impacts related to hazards and hazardous materials would remain less than significant.

i. Hydrology and Water Quality

Under the No Project Alternative, overall development and associated population growth would be substantially reduced compared to the proposed project. This reduction in development would result in less impervious surface areas and, consequently, lower volumes of stormwater runoff. With less construction and urbanization, the potential for erosion, sedimentation, and pollutant loading into local waterways would also be reduced.

Regardless of the level of development, any future projects under the No Project Alternative would remain subject to the same regulatory framework as the proposed project. This includes compliance with the National Pollutant Discharge Elimination System permit requirements, the City's municipal code provisions related to stormwater management, and applicable General Plan goals and policies that protect water quality and manage hydrologic impacts.

Overall, the No Project Alternative would result in a reduced potential for hydrology and water quality impacts due to less development and impervious surface area. With continued compliance with existing regulations and policies, impacts would remain less than significant.

j. Land Use and Planning

Under the No Project Alternative, future development in Pacific Grove would continue to follow the existing land use designations and policies established in the existing General Plan. Because this alternative represents a continuation of the City's adopted land use framework, it would not introduce any new land use changes or conflicts. As such, it would not physically divide an established community, since no new infrastructure or land use patterns would be introduced that could disrupt existing neighborhood connectivity. Additionally, because the existing General Plan was developed to support orderly, well-planned, and balanced growth consistent with the historic nature and setting of Pacific Grove, the capacity of the City's infrastructure, and community goals, the No Project Alternative would not cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The existing General Plan was also designed for consistency and compatibility with other applicable land use plans, policies, and regulations.

Overall, because the No Project Alternative reflects the City's existing adopted land use plan, it would not result in any new impacts related to land use or planning. Impacts would be reduced compared to the proposed project.

k. Noise

Under the No Project Alternative, overall development would be substantially reduced compared to the proposed project, with approximately 1,979 fewer housing units and a lower overall intensity of construction and operational activity. As a result, construction-related noise and vibration would generally be less intense and less frequent than under the proposed project. Similarly, with approximately 4,195 fewer new residents, operational noise, including traffic-related noise, would also be reduced.

Despite the lower level of development, construction activities under the No Project Alternative would still generate temporary noise and vibration. However, all development would be required to comply with the City's Noise Ordinance and the noise-related policies and programs in the existing General Plan, which include requirements to analyze and mitigate significant noise impacts for projects requiring discretionary approval. In addition, if future development under the No Project Alternative is subject to CEQA, specific project-level environmental review would be required. As

part of that process, mitigation measures would be developed, as needed, to address potential noise impacts on a project-by-project basis.

The No Project Alternative would reduce construction and operational noise impacts due to less development, and would comply with noise regulations, policies, and mitigation measures as required. However, similar to the proposed project, it is possible that construction noise may exceed acceptable thresholds in proximity to sensitive receivers. Impacts would be reduced compared to the proposed project, but would be significant and unavoidable.

l. Population and Housing

Under the No Project Alternative, development in Pacific Grove would continue to be guided by the existing General Plan. As shown in Table 6-1, the No Project Alternative would accommodate approximately 356 new housing units and a population increase of 755 people by 2031, representing an 85 percent reduction in housing units and in population growth compared to the proposed project.

Because the No Project Alternative reflects continuation of the City's existing land use policies and does not introduce new land use designations or infrastructure extensions, it would not induce substantial unplanned population growth. Additionally, it would not displace existing housing or residents, as development would occur in accordance with the existing General Plan and zoning framework.

Overall, the No Project Alternative would result in substantially less population growth and housing development than the proposed project. It would not induce unplanned growth or displace existing housing, and therefore, impacts related to population and housing would be less than significant and reduced compared to the proposed project.

m. Public Services and Recreation

The No Project Alternative would accommodate 4,195 fewer residents and 1,979 fewer housing units than the proposed project. Population growth and development under the No Project Alternative would be consistent with regional projections and growth currently anticipated by the City. Therefore, the No Project Alternative would generate less localized demand for fire, police, school, library services, and recreation facilities compared to the proposed project, and would not result in the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts.

Overall, the No Project Alternative would result in reduced demand for public services and recreational resources due to lower population growth. Impacts would be less than significant and reduced compared to the proposed project.

n. Transportation

When compared to the proposed project, the No Project Alternative would result in the addition of 4,195 fewer residents and 200 fewer jobs. As a result, the number of daily vehicle trips generated by new residents and employees would be substantially lower, and total VMT across Pacific Grove would also be reduced. However, as discussed in Section 4.14, *Transportation,* transportation impacts are evaluated in terms of VMT per capita, or a measure of VMT per person, rather than total VMT in the city.

As shown in Table 4.14-2 in Section 4.14, *Transportation* (and discussed in detail in Appendix E), VMT per capita would be greater under 2031 No Project conditions than 2031 with Project conditions. This is primarily due to the more dispersed development pattern under the No Project Alternative, which would not concentrate housing near commercial areas, schools, or services. In contrast, the proposed project would facilitate higher-density, infill development that supports shorter trip lengths and more opportunities for walking, biking, and transit use. While the No Project Alternative would result in less overall driving, it would generate more driving per person, which is inconsistent with state and regional efforts to reduce transportation-related GHG emissions. Accordingly, impacts related to VMT would be significant and greater than the proposed project, which would have less than significant impacts to VMT.

Similar to the proposed project, development facilitated by the No Project Alternative would comply with regulations and policies in the City's municipal code and General Plan related to maintaining emergency access and avoiding transportation hazards. Impacts would be less than significant and similar to the proposed project.

Overall, transportation impacts would be greater under the No Project Alternative compared to the proposed project due to VMT.

o. Tribal Cultural Resources

As discussed in Section 4.15, *Tribal Cultural Resources,* no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources were identified within the project area. In addition, no tribal cultural resources were identified within or near the project area that have been determined by the City of Pacific Grove, as the CEQA lead agency, to be significant. Therefore, development in the city under the No Project Alternative, similar to the proposed project, would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code (PRC) Section 21074 that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k) or that is a resource determined by Pacific Grove (the lead agency), in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). The No Project Alternative would have no impact to tribal cultural resources, similar to the proposed project.

p. Utilities and Service Systems

The No Project Alternative would accommodate 4,195 fewer residents and 1,979 fewer housing units than the proposed project. As a result, it would reduce demand for wastewater, stormwater, natural gas, electricity, telecommunications, and solid waste infrastructure and services compared to the proposed project. As demonstrated in Section 4.16, *Utilities and Service Systems,* the project would be served by sufficient infrastructure and capacity. Given the substantially lower level of development under the No Project Alternative, existing systems would continue to have sufficient capacity to serve this alternative without the need for new or expanded facilities that could result in physical environmental impacts.

As discussed in Section 4.16.3 of Section 4.16, *Utilities and Service Systems,* there is sufficient water supply available to serve No Project scenarios through the horizon year of 2045. As shown in Table 4.16-2 in Section 4.16, the per capita water demand by the year 2035 is projected to be 0.13 acre-feet per year (AFY) per person. This projected water demand is appropriate to use for the purpose of this alternatives analysis, as water demand by 2035 would be inclusive of demand that would exist by the project's buildout year of 2031. The No Project Alternative would result in 755 new

residents, which would result in an additional water demand of approximately 98 AFY[2] by 2035. This additional demand would be approximately 85 percent less than the additional demand associated with the proposed project, which would be 635 AFY by 2035 (see Table 4.16-3 in Section 4.16). As shown in Table 4.16-7 in Section 4.16, this additional demand could be accommodated by existing water supply without implementation of the Monterey Peninsula Water Supply Project (MPWSP) Ocean Desalination Plant. Therefore, impacts related to water supply would be less than significant under the No Project Alternative, and Mitigation Measure UTIL-2 would not be required.

As discussed in Section 4.16.3 and shown in Table 4.16-1 of Section 4.16, *Utilities and Service Systems,* wastewater generation can be estimated for residential and commercial uses using factors of 120 gallons per day (GPD) per residential unit and 35 GPD per employee. As shown in Table 6-1, the No Project Alternative would result in the addition of 356 housing units and 273 jobs compared to existing conditions. Multiplying 356 housing units by 120 GPD and 273 jobs by 35 GPD, the No Project Alternative would result in the generation of approximately 42,720 GPD of wastewater for residential uses and 9,555 GPD of wastewater for commercial uses, for a combined additional wastewater generation of 52,275 GPD. As shown in Table 4.16-1 in Section 4.16, the proposed project would result in the generation of 294,200 GPD of wastewater. Accordingly, the No Project Alternative would generate 82 percent less wastewater compared to the proposed project. As discussed in Section 4.16, *Utilities and Service Systems,* the Regional Wastewater Treatment Plant would have sufficient capacity to accommodate wastewater generated by the proposed project, and accordingly would have sufficient capacity for the No Project Alternative. Impacts would be less than significant and reduced compared to the proposed project.

As discussed in Section 4.16.3 of Section 4.16, *Utilities and Service Systems,* solid waste generation can be estimated for residential and commercial uses using CalRecycle's solid waste generation rates of 5.31 pounds per housing unit per day and 10.53 pounds per employee per day. As shown in Table 6-1, the No Project Alternative would result in the addition of 356 housing units and 273 jobs compared to existing conditions. Multiplying 356 housing units by 5.31 pounds per day and 273 employees by 10.53 pounds per day, the No Project Alternative would result in the generation of approximately 1,890 pounds of solid waste per day from residential uses and 2,875 pounds of solid waste per day from commercial uses, for a total of an additional 4,765 pounds of solid waste per day. As discussed under Impact UTIL-3 in Section 4.16, the proposed project would generate an estimated 16,611 pounds of solid waste per day. Accordingly, the No Project Alternative would generate approximately 70 percent less solid waste than the proposed project. The Monterey Peninsula Landfill has a maximum throughput of 3,500 tons per day; solid waste generated by the No Project Alternative would account for less than 0.1 percent of the maximum throughput. Therefore, the No Project Alternative would not generate solid waste in excess of state or local standards. Impacts would be less than significant and reduced compared to the proposed project.

Overall, the No Project Alternative would result in reduced demand for utilities and service systems due to lower development intensity. With existing capacity and regulatory compliance, impacts would be less than significant without mitigation and reduced compared to the proposed project, eliminating the need for Mitigation Measure UTIL-2.

[2] 755 additional residents multiplied by 0.13 AFY per person equals approximately 98 AFY.

q. Wildfire

Under the No Project Alternative, development in Pacific Grove would continue under the existing General Plan, resulting in approximately 1,979 fewer housing units and 4,195 fewer residents compared to the proposed project. This reduced level of development would result in fewer new structures and fewer people located in areas subject to wildfire risk.

Several housing sites and additional parcels that could be developed under the No Project Alternative are located within designated fire hazard severity zones (FHSZs). Specifically, Sites 32–37, Site 57, and additional parcels A3–A9 are located in a Very High FHSZ; Sites 20–22, 24–28, 30, and 31 are within a High FHSZ; and Sites 23, 29, 48–50, 55, and additional parcels A10 and A11 are within a Moderate FHSZ. Many of these sites, including Sites 48, 49, 55, 57, and the Forest Hill District sites, are already developed with commercial or institutional uses, while parcels A3–A9 are developed with residential uses. While development could still occur on these sites under the No Project Alternative, it would be at a lower intensity than under the proposed project, resulting in fewer new structures and less population exposure within high-risk areas.

Unlike the proposed project, the No Project Alternative would not include updates to the City's Health and Safety Element, which contains new and revised policies aimed at reducing wildfire risk and improving community resilience. However, all development would continue to comply with existing emergency response and evacuation plans, as well as applicable state and local fire safety regulations.

Overall, the No Project Alternative would result in fewer people and structures located in wildfire-prone areas, thereby reducing the potential for exposure to wildfire hazards and the risk of exacerbating wildfire conditions. Impacts related to wildfire would be less than significant and reduced compared to the proposed project.

6.3 Alternative 2: Reduced Density

6.3.1 Description

This alternative assumes the adoption and implementation of the Housing Element Update, zoning amendments, and General Plan amendments, with provisions for reduced densities across all proposed housing sites, upzoning areas, and additional parcels. Alternative 2 would maintain the same number and location of housing sites as the proposed project yet would involve reduced density at each site to ensure the development of only the minimum number of housing units required to meet the RHNA and for the Housing Element Update to be approved by the California Department of Housing and Community Development (HCD). As discussed in Chapter 2, *Project Description,* and shown in Table 2-2, AMBAG adopted a RHNA plan that allocated 1,125 housing units to Pacific Grove. As shown in Table 2-3 in Chapter 2, *Project Description,* when accounting for pending and approved projects and estimated accessory dwelling unit development in Pacific Grove, the City has a remaining RHNA of 891 units. In addition to the RHNA, Program 10 (Enhanced Housing Mobility Options) and Program 21 (Affirmatively Furthering Fair Housing) of the proposed Housing Element Update have the objective to facilitate the development of 75 and 25 additional residential units, respectively, not included in units needed to meet the RHNA. These programs are required by HCD. Therefore, for any alternative to be feasible, the alternative must facilitate the development of 891 units required by the RHNA plus 100 units required by Programs 10 and 21, for a total of 991 housing units.

Alternative 2 would facilitate the development of 991 units, the minimum number of housing units required to meet the RHNA and meet HCD's requirements for the Housing Element Update. Unlike the proposed project, this alternative does not assume full buildout at maximum density for each housing site; instead, it envisions development at various, lower densities.

The site inventory and potential buildout associated with this alternative is shown below in Table 6-2. The number of units per site was determined by reducing density by 10 to 20 percent compared to the proposed project, and then increasing the density at various housing sites until the housing sites had appropriate densities to accommodate the minimum number of housing units needed to meet the RHNA. Densities for housing sites that could accommodate 10 units or fewer were not reduced under this alternative.

Table 6-2 Alternative 2 Site Inventory and Potential Buildout

Site Number	Address	Number of Units per Site Under Alternative 2
Downtown District		
1	161 Fountain Avenue and 148 15th Street	16
2	575 Lighthouse Avenue, 210 and 214 Grand Avenue	9
3	166 12th Street	2
4	226 Forest Avenue	8
5	168 Forest Avenue	14
6	490 Lighthouse Avenue	5
7	480 Lighthouse Avenue	7
8	601 Lighthouse Avenue	36
9	525 and 531 Lighthouse Avenue	72
Subtotal		169
Central Eardley Commercial District		
10	168 Central Avenue	2
11	160 Central Avenue	5
12	100 and 120 Central Avenue	8
13	127 Central Avenue	2
14	105 and 109 Central Avenue	7
15	167 Central Avenue	6
16	155 and 159 Central Avenue	9
17	173 Central Avenue	3
18	95 Central Avenue	11
19	119 Dewey Avenue	3
Subtotal		56
Forest Hill Commercial District		
20	2749 Forest Hill Boulevard	26
21	1146 and 1152 Forest Avenue	33
22	1125, 1129, 1133, and 1137 Forest Avenue	20
23	1107, 1117, and 1123 Forest Avenue	5
24	1141 Forest Avenue	7

Site Number	Address	Number of Units per Site Under Alternative 2
25	1149 Forest Avenue	7
26	1157 Forest Avenue	16
27	1193 Forest Avenue	22
28	1199 Forest Avenue	12
29	1124 and 1140 Forest Avenue	78
30	1160 Forest Avenue	16
31	1180 Forest Avenue	25
32	1201 Forest Avenue	6
33	1219 Forest Avenue	22
34	1247 Forest Avenue	10
35	1225 Forest Avenue	13
36	1224 Forest Avenue	12
37	Ransford Avenue	7
Subtotal		337
Dennett and Sinex District		
38	506 Walnut Street	15
39	611, 637, and 659 Dennett Street	30
40	710 and 720 Grove Acre Avenue	11
41	1126 Sinex Avenue and 679 Dennett Street	10
Subtotal		66
Other Sites		
42	503 Chestnut Street	1
43	506 Walnut Street	1
44	514 6th Street	1
45	411 Grand Avenue	1
46	418 8th Street	1
47	304 Grove Acre Avenue	6
48	2184 Sunset Drive	11
49	17 Mile Drive	34
50	915 Sunset Drive	113
51	522 Fountain Avenue	3
52	136 8th Street	8
53	1030 Lighthouse Avenue	24
54	305 Fountain Avenue	2
55	801 Sunset Drive	60
56	970 Sunset Drive	8
57	1236 Presidio Boulevard	6
Subtotal		280

Site Number	Address	Number of Units per Site Under Alternative 2
Office Conversion		
58	311 Forest Avenue	2
59	209 Grand Avenue	2
60	222 Grand Avenue	2
61	581 Lighthouse Avenue	9
62	205 17th Street	3
63	208 and 210 17th Street	5
64	716 Lighthouse Avenue	3
65	718 Lighthouse Avenue	3
66	604 Lighthouse Avenue	2
67	650 Lighthouse Avenue	5
68	541 Lighthouse Avenue	3
69	588 and 590 Lighthouse Avenue	4
70	575 Lighthouse Avenue	5
71	562 Lighthouse Avenue	16
72	146 12th Street	8
73	141 14th Street	11
Subtotal		83
Total		**991**

This alternative would facilitate development of 991 housing units, which is 1,344 fewer units than what would be facilitated by the proposed project. Because Alternative 2 would facilitate only the minimum number of housing units required, it would not involve the 20 percent buffer of additional housing units included in the proposed project. While not legally required, this buffer is often implemented to ensure compliance with the "No Net Loss" law (Government Code Section 65863).

It is also assumed that the Reduced Density Alternative would accommodate only half the commercial development as the proposed project. This reflects the reduced density increases needed to accommodate the minimum housing unit requirement. As a result, the Reduced Density Alternative is expected to generate approximately 200 fewer jobs than would be facilitated by the proposed project.

Because 1,344 fewer housing units would be facilitated under Alternative 2, population growth would be reduced compared to the proposed project. Assuming 2.12 persons per household, full buildout of Alternative 2 would result in a population increase of approximately 2,101 people, for a total population in Pacific Grove of 17,067 by 2031. This would be 2,849 fewer people than the total population associated with implementation of the proposed project (19,916 people) (Table 6-1).

Other than the reduced density permitted at each housing site, Alternative 2 would involve all other elements of the proposed project, including objective design standards and amendments to the Land Use Element and the Health and Safety Element of the General Plan.

Alternative 2 would accomplish most of the project objectives, including: providing capacity to meet the State-required RHNA for the 6th Cycle Housing Element planning period of 2023-2031; ensuring that the growth facilitated by the Housing Element is achievable, through associated amendments

to the Zoning Code and/or Land Use Element of the General Plan; dispersing housing sites throughout the city to ensure no single neighborhood or area is overburdened or impacted; improving fair housing conditions in the city by implementing meaningful actions; bringing the City's General Plan into conformance with recently enacted state law, including AB 747, SB 99, and SB 379; identifying housing policies and programs that enable the development of additional units; encouraging the development of by-right low-income housing for the 6th Cycle housing sites proposed for rezoning and existing 4th and 5th Cycle housing sites that are reused in the 6th Cycle, increasing the overall availability of affordable housing; or identifying appropriate housing sites and provide housing development opportunities in specified areas with the potential to accommodate additional housing or are proximate to jobs, transportation, shopping and schools. However, Alternative 2 would not include the 20 percent buffer of additional housing units and would not meet the project objective of providing a 20 percent buffer.

6.3.2 Impact Analysis

a. Aesthetics

The Reduced Density Alternative would facilitate the development of housing and commercial uses on the same housing sites, upzoning areas, and additional parcels as the proposed project, but at a reduced density. In addition, Alternative 2 would include adoption of objective design standards and some zoning changes to accommodate development in these sites.

Because the development footprint of the Reduced Density Alternative would be the same as the proposed project, potential impacts to scenic vistas, the City's established visual character, and light and glare conditions under Alternative 2 would be generally similar to those anticipated under the proposed project. However, development that is reduced in size and density under Alternative 2 would reduce visual impacts in some areas – for example, shorter structures would have less potential to block views of scenic vistas, while reduced massing and height would have less potential to degrade existing visual character or the quality of public views. As such, aesthetic impacts would generally be less severe.

As under the proposed project, development that occurs under Alternative 2 would be subject to the goals, policies, and regulations that pertain to visual resources in the existing General Plan and in the Pacific Grove Municipal Code and would continue to undergo discretionary review ensuring consistency with existing design and character. In addition, as with the proposed project, Alternative 2 would include objective design standards for multi-family residential and mixed-use development, which would further regulate aesthetic features of future development.

Overall, due to the lower density and buildout associated with Alternative 2, impacts to aesthetics would be reduced when compared to the proposed project. Impacts would remain less than significant.

b. Air Quality

Under the Reduced Density Alternative, development would occur on the same sites as the proposed project, but at a reduced density. As shown in Table 6-1, Alternative 2 would result in reduced buildout potential compared to the proposed project, as it would facilitate the development of 1,344 fewer housing units and the addition of 2,849 fewer people than the proposed project.

Construction activities under Alternative 2 would be less intensive than those under the proposed project due to the reduced overall development scale. With approximately 55 percent fewer housing units and a 50 percent reduction in new jobs, both the duration and magnitude of construction would be substantially lower. As shown in Table 4.2-8 in Section 4.2, *Air Quality*, construction emissions for a representative project scenario would not exceed Monterey Bay Air Resources District (MBARD) thresholds. Given the reduced scope of development, construction emissions under Alternative 2 would be proportionally lower and would remain well below MBARD significance thresholds, even if construction occurs over a similar timeframe as the proposed project.

Similarly, operational emissions would also be reduced in proportion to the lower residential and commercial buildout. With fewer vehicle trips, reduced energy demand, and lower area source emissions, Alternative 2 would generate substantially less operational air pollution. These reductions would ensure that operational emissions remain below applicable MBARD thresholds, further minimizing the potential for significant air quality impacts.

Although the overall amount of construction and operational emissions would be reduced under Alternative 2, development under Alternative 2 may still occur proximate to sensitive receptors, and could result in the exposure of sensitive receptors to substantial pollutant concentrations. Mitigation Measures AQ-3(a) and AQ-3(b) would be required under Alternative 2. In addition, future development under the Reduced Density Alternative would be required to comply with MBARD rules and Pacific Grove Municipal Code regulations that intend to reduce pollutant emissions.

Overall, air quality impacts under Alternative 2 would be reduced compared to the proposed project, but would remain less than significant with mitigation.

c. Biological Resources

Under the Reduced Density Alternative, development would occur on the same sites as the proposed project, but at a reduced density. As discussed in Section 4.3, *Biological Resources,* most of the potential impacts to biological resources are associated with housing sites that are currently undeveloped, including Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4. Although these sites would accommodate less dense development than the proposed project, development would still be allowed on these sites under Alternative 2. Despite the reduced level of development, ground disturbance on these sites would occur to the same extent as the proposed project. As a result, impacts to known special-status species or their associated habitat, including through habitat modifications; impacts to sensitive Monterey pine communities and riparian habitat; and impacts to intermittent streams (present at Site 49 and additional parcels A3 and A4) would still occur to roughly the same degree as the proposed project.

As noted in Section 4.3, *Biological Resources,* once a site has been developed or re-developed, the proposed operational uses of individual sites would not result in substantial new operational impacts to special-status plants or wildlife beyond those occurring under existing baseline conditions. Similarly, operational impacts to riparian habitat, sensitive natural communities, and jurisdictional areas are nominal and less than significant. Thus, the reduced buildout associated with Alternative 2 would not measurably reduce operational impacts related to biological resources.

Development under the Reduced Density Alternative would be subject to federal, state, and local regulations pertaining to the protection of biological resources, and would require implementation of Mitigation Measures BIO-1(a) through BIO-1(i), BIO-3(a), and BIO-3(b), as outlined in Section 4.3, *Biological Resources*.

Overall, impacts to biological resources under Alternative 2 would be similar to those under the proposed project due to the presence of sensitive resources on Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4. Impacts would remain less than significant with mitigation.

d. Cultural Resources

Under the Reduced Density Alternative, future development would occur on the same housing sites, upzoning areas, and additional parcels as the proposed project. Development would be reduced in size and density compared to the proposed project, and the City would continue to implement its Guidelines for Historic Assessments, existing General Plan policies related to historical resources (which would not be amended by the project or this alternative), and municipal code regulations, which provide protection for historical resources. Development under this alternative would continue to comply with the City's requirement to comply with the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings.

Although Alternative 2 would accommodate less dense development compared to the proposed project, this alternative would facilitate development of the same housing sites, upzoning areas, and additional parcels as the proposed project. Therefore, the likelihood of projects resulting in impacts to the significance of historic resources would be generally the same. As such, the potential for a project to result in a significant and unavoidable impact to historical resources, such as through substantial alteration of a historic structure, would still occur, despite the overall reduction in buildout. Impacts to historical resources under Alternative 2 would be significant and unavoidable, similar to the proposed project.

Despite the reduced level of development under Alternative 2, this alternative would facilitate development in the same sites as the proposed project. Accordingly, a similar extent of ground disturbance would occur throughout the city, and the potential to impact one of the 56 known archaeological resources in Pacific Grove would remain. As such, Alternative 2 would have similar potential to adversely impact archaeological resources and human remains. Mitigation Measures CUL-2(a) and CUL-2(b) would be required under this alternative, which would reduce potential impacts to a less than significant level. Alternative 2's impacts related to archaeological resources would be less than significant with mitigation, similar to the proposed project.

Overall, impacts to cultural resources would be similar to the proposed project given the same general development footprint, and would remain significant and unavoidable.

e. Energy

Under the Reduced Density Alternative, development would occur on the same housing sites, upzoning areas, and additional parcels as the proposed project, but at a reduced density. As shown in Table 6-1**,** Alternative 2 would result in reduced buildout potential compared to the proposed project, as it would facilitate the development of 1,344 fewer housing units and the addition of 2,849 fewer people than the proposed project.

Construction activities under Alternative 2 would be less intensive than those under the proposed project due to the reduced development scale. With approximately 55 percent fewer housing units and a 50 percent reduction in new jobs, construction-related energy consumption would be proportionally lower. This reduction in construction activity would decrease temporary energy demand and the potential for wasteful or inefficient energy use.

Operational energy use would also be substantially reduced under Alternative 2. With a 55 percent reduction in projected population growth, long-term energy demands for building operations,

transportation, and infrastructure would be lower. Alternative 2 would not result in the inefficient, wasteful, or unnecessary consumption of energy resources, and impacts would be less than those of the proposed project.

Overall, impacts related to energy would be reduced compared to the proposed project and would remain less than significant.

f. Geology and Soils

The Reduced Density Alternative would result in reduced buildout potential compared to the proposed project, accommodating 2,849 fewer residents and 1,344 fewer housing units than the proposed project. Thus, compared to the proposed project, Alternative 2 would expose fewer people and structures to geologic and seismic hazards. Similar to the proposed project, Alternative 2 would include updates to the City's Health and Safety Element of the General Plan, including new and updated policies that identify and aim to avoid seismic and geologic hazards such as erosion, landslides, and groundshaking. This, combined with the overall reduced buildout, would reduce the risk of exposing people or structures to geologic and seismic hazards. Therefore, Alternative 2's impacts related to geology and seismicity would be reduced compared to the proposed project and would remain less than significant.

Despite the reduced level of development under Alternative 2, this alternative would facilitate development on the same housing sites, upzoning areas, and additional parcels as the proposed project. Accordingly, a similar extent of ground disturbance would occur throughout the city, and the potential to impact paleontological resources would be generally the same as the proposed project. Mitigation Measure GEO-9 would continue to be required under this alternative.

Overall, Alternative 2's impacts related to geology and soils would be reduced compared to the proposed project but would remain less than significant with mitigation.

g. Greenhouse Gas Emissions

As discussed in Section 4.7, *Greenhouse Gas Emissions,* potential impacts related to GHG emissions are assessed by determining if a project complies with adopted plans, programs, policies, and/or other regulatory strategies to reduce GHG emissions. Plans considered in this determination include the California Air Resources Board's 2022 Scoping Plan and AMBAG's 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy. The Reduced Density Alternative would result in less development than the proposed project, as it would result in 1,344 fewer housing units than the proposed project, a 55 percent reduction. GHG emissions would be reduced at a commensurate rate. Although the Reduced Density Alternative would generate fewer GHG emissions than the proposed project, there is no adopted numerical threshold of significance for GHG emissions applicable to the project area. Therefore, the determination of impact significance is based on policy consistency rather than emissions volume.

Similar to the proposed project, development under Alternative 2 could include natural gas service and may not include electric vehicle infrastructure. Electrifying buildings and transit are key project attributes identified in the 2022 Scoping Plan as critical to achieving the state's climate goals. As a result, the Reduced Density Alternative would be inconsistent with the 2022 Scoping Plan's objectives, similar to the proposed project. Accordingly, while Alternative 2 would result in lower GHG emissions due to reduced development, it would be inconsistent with state and regional GHG reduction plans and policies to the same extent as the proposed project. As such, the impact related

to GHG emissions under the Reduced Density Alternative would be considered significant and unavoidable, similar to that of the proposed project.

h. Hazards and Hazardous Materials

Under the Reduced Density Alternative, development would occur on the same housing sites, upzoning areas, and additional parcels as the proposed project, but at a reduced density. As shown in Table 6-1, Alternative 2 would result in reduced buildout potential compared to the proposed project, as it would facilitate the development of 1,344 fewer housing units and the addition of 2,849 fewer people than the proposed project.

Although Alternative 2 would expose a reduced number of housing units and residents to potential hazards, this alternative would facilitate development on the same sites as the proposed project. Despite the reduced level of development, ground disturbance on these sites would occur to roughly the same extent as the proposed project. As a result, the potential for ground disturbance that could expose existing contaminated soils or hazardous materials, particularly in areas with a history of prior industrial or commercial use, would generally be the same as the proposed project. Further, the likelihood of releasing hazardous substances during activities such as demolition of older structures that may contain lead-based paint, asbestos, or other legacy contaminants would be similar to the proposed project.

Similar to the proposed project, development under the Reduced Density Alternative would be required to comply with federal and state regulations, including but not limited to the Clean Air Act, the Comprehensive Environmental Response, Compensation, and Liability Act, the Toxic Substances Control Act, the California Health and Safety Code, the California Fire and Building Codes, and MBARD Rule 424, pertaining to the removal and disposal of asbestos-containing materials, polychlorinated biphenyls, and other hazardous materials. Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials during both construction and operation.

Overall, Alternative 2 would result in similar potential for exposure to hazardous materials due to similar amounts of ground disturbance. With compliance with existing regulations, impacts related to hazards and hazardous materials would remain less than significant.

i. Hydrology and Water Quality

Although development facilitated by Alternative 2 would be reduced in size and density compared to the proposed project, development would be facilitated on the same housing sites, upzoning areas, and additional parcels as the proposed project. Therefore, Alternative 2 would result in a similar extent of ground disturbance and a similar amount of new impervious surfaces as the proposed project, and would result in similar levels of stormwater runoff. The potential for Alternative 2 to cause erosion, sedimentation, and pollutant loading into local waterways would therefore be similar to the proposed project.

As with the proposed project, development facilitated by Alternative 2 would remain subject to the same regulatory framework. This includes compliance with the National Pollutant Discharge Elimination System permit requirements, the City's Municipal Code provisions related to stormwater management, and applicable General Plan goals and policies that protect water quality and manage hydrologic impacts.

Overall, the Reduced Density Alternative would result in similar hydrology and water quality impacts as the proposed project. With continued compliance with existing regulations and policies, impacts would remain less than significant.

j. Land Use and Planning

Similar to the proposed project, the Reduced Density Alternative would involve the same zoning changes and proposed revisions to the City's Land Use Element. Further, Alternative 2 would facilitate development on the same housing sites, upzoning areas, and additional parcels as the proposed project. As determined in Section 4.10, *Land Use and Planning,* development of these sites would not physically divide an established community and would not cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, similar to the proposed project, Alternative 2 would not result in the physical division of an established community, and would not 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. Impacts would be less than significant and similar to the proposed project.

k. Noise

Under the Reduced Density Alternative, development would occur on the same housing sites, upzoning areas, and additional parcels as the proposed project, but at a reduced density. As shown in Table 6-1, Alternative 2 would result in reduced buildout potential compared to the proposed project, facilitating 1,344 fewer housing units and 2,849 fewer people. As a result, construction-related noise and vibration would generally be less intense and less frequent than under the proposed project. Similarly, with approximately 2,849 fewer new residents, operational noise, including traffic-related noise, would also be reduced.

All development under Alternative 2 would be required to comply with the City's Noise Ordinance and the noise-related policies and programs in the existing General Plan (which would not be amended by the project or this alternative), which include requirements to analyze and mitigate significant noise impacts for projects requiring discretionary approval. Despite the lower level of development and compliance with policies and regulations, construction activities under the Reduced Density Alternative would still generate temporary noise and vibration. Similar to the proposed project, development facilitated by Alternative 2 would be located adjacent to or nearby sensitive receptors, and noise levels from construction and operation may exceed the City's thresholds. Mitigation Measure NOI-1(a), NOI-1(b), and NOI-2 could be required to reduce construction noise, operational noise, and construction vibration. However, even with implementation of mitigation measures and compliance with local policies and regulations, construction noise and stationary noise may exceed the City's thresholds.

The Reduced Density Alternative would reduce construction and operational noise impacts due to less development, and would comply with noise regulations, policies, and mitigation measures as required. However, similar to the proposed project, it is possible that construction noise may exceed acceptable thresholds in proximity to sensitive receivers. Impacts would be reduced compared to the proposed project, but would be significant and unavoidable.

l. Population and Housing

As shown in Table 6-1, Alternative 2 would accommodate a population increase of 2,101 people by 2031, or 2,849 fewer people than the proposed project. Alternative 2 would also involve the development of 991 housing units, or 1,344 fewer housing units than the proposed project. This represents a 55 percent reduction in housing units and population and a 50 percent reduction in the number of new jobs compared to the proposed project.

Although Alternative 2 would allow for less population growth, this level of growth would still be greater than current growth projections for the city. As discussed in Section 4.12, *Population and Housing,* although growth would exceed local and regional population projections, this growth would not be unplanned as the Housing Element Update, General Plan amendments, and zoning changes would be undertaken to specifically plan for and accommodate this projected population and housing increase. Therefore, Alternative 2 would not result in substantial unplanned growth, similar to the proposed project.

Because development would occur on the same housing sites, upzoning areas, and additional parcels as the proposed project, the displacement of people or housing units as a result of Alternative 2 would be similar to that of the proposed project.

Overall, the Reduced Density Alternative would result in less population growth and housing development than the proposed project. Although growth would exceed local and regional population projections, this growth would not be unplanned. As such, impacts related to population and housing would be less than significant and reduced compared to the proposed project.

m. Public Services and Recreation

The Reduced Density Alternative would accommodate 2,849 fewer residents and 1,344 fewer housing units than the proposed project. Similar to the proposed project, growth anticipated under Alternative 2 would exceed regional projections and growth currently anticipated by the City; however, growth under Alternative 2 would be reduced compared to the proposed project. Therefore, Alternative 2 would generate less localized demand for fire, police, school, library services, and recreation facilities compared to the proposed project.

As discussed in Section 4.13, *Public Services and Recreation,* the proposed project would not result in the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts. Because of its reduced level of development, Alternative 2 would similarly not require new or altered government facilities. Impacts would be less than significant and reduced compared to the proposed project.

n. Transportation

When compared to the proposed project, the Reduced Density Alternative would result in the addition of 2,849 fewer residents and 200 fewer jobs. The average daily vehicle trips that would have been generated by these residents and employees under the proposed project would not occur, which would reduce VMT. In addition, because Alternative 2 would facilitate housing development on the same sites as the proposed project, it can be assumed that future residents under Alternative 2 would generate similar vehicle trips to places where residents work, shop, or go to school. Therefore, it is assumed that the VMT per capita under Alternative 2 would be similar to that of the proposed project, which is below the VMT per capita and per employee thresholds as shown in Table 4.14-2 in Section 4.14, *Transportation.* Alternative 2's impacts related to VMT would be less than significant, similar to the proposed project.

Similar to the proposed project, development facilitated by Alternative 2 would comply with regulations and policies in the City's municipal code and General Plan related to maintaining emergency access and avoiding transportation hazards. Impacts would be less than significant and similar to the proposed project.

Overall, transportation impacts would be similar to the proposed project and would remain less than significant.

o. Tribal Cultural Resources

As discussed in Section 4.15, *Tribal Cultural Resources,* no tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources were identified within the project area. In addition, no tribal cultural resources were identified within or near the project area that have been determined by the City of Pacific Grove, as the CEQA lead agency, to be significant. Therefore, development in the city under Alternative 2, similar to the proposed project, would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k) or that is a resource determined by Pacific Grove (the lead agency), in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). Alternative 2 would have no impact to tribal cultural resources, similar to the proposed project.

p. Utilities and Service Systems

The Reduced Density Alternative would accommodate 2,849 fewer residents and 1,344 fewer housing units than the proposed project, and would result in reduced demand for wastewater, stormwater, natural gas, electricity, telecommunications, and solid waste infrastructure and services compared to the proposed project. As demonstrated in Section 4.16, *Utilities and Service Systems,* the project would be served by sufficient infrastructure and capacity; given the reduced buildout that would occur under Alternative 2, existing systems would continue to have sufficient capacity to serve this alternative without the need for new or expanded facilities that could result in physical environmental impacts.

As shown in Table 4.16-2 in Section 4.16, *Utilities and Service Systems,* the per capita water demand by the year 2035 is projected to be 0.13 AFY per person. This projected water demand is appropriate to use for the purpose of this alternatives analysis, as water demand by 2035 would be inclusive of demand that would exist by the project's buildout year of 2031. The Reduced Density Alternative would result in 2,101 new residents, which would result in an additional water demand of approximately 273 AFY[3] by 2035. This additional demand would be approximately 55 percent less than the additional demand associated with the proposed project, which would be 635 AFY by 2035 (see Table 4.16-3 in Section 4.16). As shown in Table 4.16-7 in Section 4.16, this additional demand could be accommodated by existing water supply and projected future supplies, assuming the MPWSP Ocean Desalination Plant comes online. However, should the MPWSP Ocean Desalination Plant fail to be constructed and operational by 2030, a shortfall could occur and sufficient water supplies may not be available for development facilitated by Alternative 2 and reasonably foreseeable development in the region. Similar to the proposed project, Alternative 2 would require implementation of Mitigation Measure UTIL-2, which would require verification of water supply for specific development prior to the City's approval of that development. Therefore, Alternative 2's

[3] 2,101 additional residents multiplied by 0.13 AFY per person equals approximately 273 AFY.

impacts related to water supply would be less than significant with mitigation, yet reduced compared to the proposed project.

As discussed in Section 4.16.3 and shown in Table 4.16-1 of Section 4.16, *Utilities and Service Systems,* wastewater generation can be estimated for residential and commercial uses using factors of 120 GPD per residential unit and 35 GPD per employee. As shown in Table 6-1, the Reduced Density Alternative would result in the addition of 991 housing units and 200 jobs compared to existing conditions. Multiplying 991 housing units by 120 GPD and 200 jobs by 35 GPD, the Reduced Density Alternative would result in the generation of approximately 118,900 GPD of wastewater for residential uses and 7,000 GPD of wastewater for commercial uses, for a combined additional wastewater generation of 125,900 GPD. As shown in Table 4.16-1 in Section 4.16, the proposed project would result in the generation of 294,200 GPD of wastewater. Accordingly, the Reduced Density Alternative would generate approximately 55 percent less wastewater compared to the proposed project. As discussed in Section 4.16, *Utilities and Service Systems,* the Regional Wastewater Treatment Plant would have sufficient capacity to accommodate wastewater generated by the proposed project, and accordingly would have sufficient capacity for the Reduced Density Alternative. Impacts would be less than significant and reduced compared to the proposed project.

As discussed in Section 4.16.3 of Section 4.16, *Utilities and Service Systems,* solid waste generation can be estimated for residential and commercial uses using CalRecycle's solid waste generation rates of 5.31 pounds per housing unit per day and 10.53 pounds per employee per day. As shown in Table 6-1, the Reduced Density Alternative would result in the addition of 991 housing units and 200 jobs compared to existing conditions. Multiplying 991 housing units by 5.31 pounds per day and 200 employees by 10.53 pounds per day, the Reduced Density Alternative would result in the generation of approximately 5,260 pounds of solid waste per day from residential uses and 2,105 pounds of solid waste per day from commercial uses, for a total of an additional 7,365 pounds of solid waste per day. As discussed under Impact UTIL-3 in Section 4.16, the proposed project would generate an estimated 16,611 pounds of solid waste per day. Accordingly, the Reduced Density Alternative would generate approximately 55 percent less solid waste than the proposed project. The Monterey Peninsula Landfill has a maximum throughput of 3,500 tons per day; solid waste generated by the No Project Alternative would account for less than 0.1 percent of the maximum throughput. Therefore, the Reduced Density Alternative would not generate solid waste in excess of state or local standards. Impacts would be less than significant and reduced compared to the proposed project.

Overall, the Reduced Density Alternative would result in reduced demand for utilities and service systems due to lower development intensity. Mitigation Measure UTIL-2 would require verification of water supply for specific development prior to the City's approval of that development. Therefore, Alternative 2's impacts related to utilities and service systems would be less than significant with mitigation, yet reduced compared to the proposed project.

q. Wildfire

The Reduced Density Alternative would accommodate 2,849 fewer residents and 1,344 fewer housing units than the proposed project, and would result in fewer new structures and fewer people located in areas subject to wildfire risk. However, the Reduced Density Alternative would facilitate development on the same sites as the proposed project, some of which are located in fire FHSZs. Specifically, Sites 32–37, Site 57, and additional parcels A3–A9 are located in a Very High FHSZ; Sites 20–22, 24–28, 30, and 31 are within a High FHSZ; and Sites 23, 29, 48–50, 55, and

additional parcels A10 and A11 are within a Moderate FHSZ. Many of these sites, including Sites 48, 49, 55, 57, and the Forest Hill District sites, are already developed with commercial or institutional uses, while parcels A3–A9 are developed with residential uses. While development would still occur on these sites under the Reduced Density Alternative, it would be at a lower intensity than under the proposed project, resulting in fewer housing units and less population exposure within high-risk areas.

Alternative 2 would also involve updates to the City's Health and Safety Element, which contains new and revised policies aimed at reducing wildfire risk and improving community resilience. In addition, all development would continue to comply with existing emergency response and evacuation plans, as well as applicable state and local fire safety regulations.

Overall, the Reduced Density Alternative would result in fewer people and structures located in wildfire-prone areas, thereby reducing the potential for exposure to wildfire hazards and the risk of exacerbating wildfire conditions. Impacts related to wildfire would be less than significant and reduced compared to the proposed project.

6.4 Alternative 3: Fewer Sites

6.4.1 Description

This alternative assumes that the Housing Element Update, zoning amendments, and General Plan amendments are adopted and implemented, but that the Housing Element Update would include fewer housing sites than the proposed project. Under this alternative, housing units would be concentrated in fewer overall housing sites, and housing sites kept in the inventory would be located in more densely-developed commercial areas (such as the Downtown District, Central-Eardley Commercial District, Forest Hill Commercial District, and the Dennett and Sinex District). Other more dispersed or currently undeveloped sites, except for those that can accommodate low-income housing, would be eliminated from the site inventory under this alternative. While the Fewer Sites Alternative would involve removing several sites from the project housing site inventory, most of the housing sites included in the Alternative 3 site inventory (excluding Sites 1, 2, 5, 7, 35, and 36) can accommodate low-income housing.

The site inventory and potential buildout associated with this alternative is shown below in Table 6-3. Under this alternative, it is assumed that each housing site is built out at 100 percent of its maximum allowable density.

Table 6-3 Alternative 3 Site Inventory and Potential Buildout

Site Number	Address	Potential Buildout (Housing Units)
Downtown District		
1	161 Fountain Avenue, 148 15th Street	18
2	575 Lighthouse Avenue, 210 and 214 Grand Avenue	11
5	168 Forest Avenue	15
7	480 Lighthouse Avenue	9
8	601 Lighthouse Avenue	42
9	525 and 531 Lighthouse Avenue	52
Subtotal		*147*
Central Eardley Commercial District		
18	95 Central Avenue	16
Subtotal		*16*
Forest Hill Commercial District		
20	2749 Forest Hill Boulevard	36
21	1146 and 1152 Forest Avenue	46
22	1125, 1129, 1133, and 1137 Forest Avenue	28
26	1157 Forest Avenue	24
27	1193 Forest Avenue	32
29	1124 and 1140 Forest Avenue	111
30	1160 Forest Avenue	26
31	1180 Forest Avenue	42
33	1219 Forest Avenue	34
35	1224 Forest Avenue	18
36	1124 Forest Avenue	14
Subtotal		*411*
Dennett and Sinex District		
38	506 Walnut Street	21
39	611, 637, and 659 Dennett Street	44
40	710 and 720 Grove Acre Avenue	16
41	1126 Sinex Avenue and 679 Dennett Street	15
Subtotal		*96*
Other Sites		
48	2184 Sunset Drive	16
49	17 Mile Drive	51
50	915 Sunset Drive	167
55	801 Sunset Drive	87
Subtotal		*321*
Total		**991**

Overall, Alternative 3 would include 26 housing sites, thereby eliminating 47 sites from the inventory. Alternative 3 includes the minimum number of sites needed to ensure the development of only the minimum number of housing units required to meet the RHNA and for the Housing Element Update to be approved by HCD. As discussed in Chapter 2, *Project Description*, and shown in Table 2-2, the Association of Monterey Bay Area Governments adopted a RHNA plan that allocated 1,125 housing units to Pacific Grove. As shown in Table 2-3 in Chapter 2, *Project Description*, when accounting for pending and approved projects and estimated accessory dwelling unit development in Pacific Grove, the City has a remaining RHNA of 891 units. In addition to the RHNA, Program 10 (Enhanced Housing Mobility Options) and Program 21 (Affirmatively Furthering Fair Housing) of the proposed Housing Element Update have the objective to facilitate the development of 75 and 25 additional residential units, respectively, not included in units needed to meet the RHNA. These programs are required by HCD. Therefore, for any alternative to be feasible, the alternative must facilitate development of 891 units required by the RHNA plus 100 units required by Programs 10 and 21, for a total of 991 housing units.

As shown in Table 6-3, this alternative would have a sufficient number of sites with sufficient density to accommodate the minimum number of housing units to meet the RHNA and HCD requirements, which is 991 units. The intent of the Fewer Sites Alternative is to facilitate development of enough housing units to meet the RHNA and HCD requirements while concentrating housing sites in more developed areas of Pacific Grove, in order to reduce potential impacts to historical resources, GHG emissions, and transportation noise.

Alternative 3 would facilitate development of up to 991 housing units. This would be 1,344 fewer units than what would be facilitated by implementation of the proposed project. In addition, it is also assumed that the Fewer Sites Alternative would accommodate only half the commercial development as the proposed project. This reflects the reduced number of sites needed to accommodate the minimum housing unit requirement. As a result, the Fewer Sites Alternative is expected to generate approximately 200 fewer jobs than would be facilitated by the proposed project.

Because 1,344 fewer housing units would be facilitated under Alternative 3, population growth would be reduced compared to the proposed project. Assuming 2.12 persons per household, full buildout of Alternative 3 would result in a population increase of 2,101 people, for a total population in Pacific Grove of 17,067 by 2031. This would be 2,849 fewer people than the total population associated with implementation of the proposed project (19,916 people).

Other than involving fewer housing sites, Alternative 3 would involve all other elements of the proposed project. Alternative 3 would involve changes to the City's General Plan Land Use Element and Health and Safety Element to ensure consistency with the Housing Element Update and to bring the General Plan into compliance with AB 747 and SB 99. Alternative 3 would accomplish most of the project objectives, including: providing capacity to meet the State-required RHNA for the 6th Cycle Housing Element planning period of 2023-2031; ensuring that the growth facilitated by the Housing Element is achievable, through associated amendments to the Zoning Code and/or Land Use Element of the General Plan; improving fair housing conditions in the city by implementing meaningful actions; bringing the City's General Plan into conformance with recently enacted State housing law, including AB 747, SB 99, and SB 379; identifying housing policies and programs that enable the development of additional units; or identifying appropriate housing sites and provide housing development opportunities in specified areas with the potential to accommodate additional housing or are proximate to jobs, transportation, shopping and schools. However, Alternative 3 would not include the 20 percent buffer of additional housing units and would not meet the project

objective of providing a 20 percent buffer. Alternative 3 would not include some housing sites that were previously identified in the 4th and 5th Cycle Housing Elements, and would not meet the project objective of encouraging the development of by-right low-income housing in the existing 4th and 5th Cycle housing sites that are reused in the 6th Cycle. In addition, by concentrating housing sites in more commercial areas, Alternative 3 would not meet the project objective of dispersing housing sites throughout the city to ensure that no single neighborhood or area is overburdened or impacted.

6.4.2 Impact Analysis

a. Aesthetics

The Fewer Sites Alternative would facilitate the development of housing and commercial uses at the same density as the proposed project but on a reduced number of housing sites, upzoning areas, and additional parcels. This alternative would eliminate 47 sites from the proposed project's inventory, resulting in an overall reduction in development potential and geographic extent. The remaining sites under this alternative are primarily located in more developed, commercial areas of Pacific Grove, including the Downtown, Central Eardley Commercial, Forest Hill Commercial, and Dennett and Sinex Districts.

Because development would be concentrated in areas that are already developed, the Fewer Sites Alternative would reduce the potential for aesthetic impacts in more visually sensitive or less developed parts of the city. By avoiding development on 47 sites, some of which may be located near scenic vistas or within areas that contribute to the city's established visual character, this alternative would reduce the likelihood of obstructing public views or altering the visual quality of less developed neighborhoods. As such, potential impacts to scenic vistas, visual character, and light and glare conditions would be reduced compared to the proposed project.

As with the proposed project, development under the Fewer Sites Alternative would be subject to the goals, policies and regulations related to visual resources in the existing General Plan (which would not be amended by the project or this alternative) and the Pacific Grove Municipal Code. Projects would continue to undergo discretionary review and would be subject to the proposed zoning changes and objective design standards, ensuring consistency with the city's design expectations and visual context.

Overall, by eliminating a substantial number of sites and focusing development in already developed areas, the Fewer Sites Alternative would reduce the extent and severity of aesthetic impacts compared to the proposed project. Impacts would remain less than significant.

b. Air Quality

As shown in Table 6-1, Alternative 3 would result in reduced buildout potential compared to the proposed project, as it would facilitate the development of 1,344 fewer housing units and the addition of 2,849 fewer people than the proposed project.

Construction activities under Alternative 3 would be less intensive than those under the proposed project due to the reduced overall development scale. With approximately 55 percent fewer housing units and a 50 percent reduction in new jobs, both the duration and magnitude of construction would be substantially lower. As shown in Table 4.2-8 in Section 4.2, *Air Quality*, construction emissions for a representative project scenario would not exceed MBARD thresholds. Given the reduced scope of development, construction emissions under Alternative 3 would be

proportionally lower and would remain well below MBARD significance thresholds, even if construction occurs over a similar timeframe as the proposed project.

Similarly, operational emissions would also be reduced in proportion to the lower residential and commercial buildout. With fewer vehicle trips, reduced energy demand, and lower area source emissions, Alternative 3 would generate substantially less operational air pollution. These reductions would ensure that operational emissions remain below applicable MBARD thresholds, further minimizing the potential for significant air quality impacts.

Although the overall amount of construction and operational emissions would be reduced under Alternative 3, development under Alternative 3 would be concentrated at sites located in the Downtown, Central Eardley Commercial, Forest Hill Commercial, and the Dennett and Sinex Districts, and could be located proximate to sensitive receptors. Similar to the proposed project, Alternative 3 could result in significant air emissions impacts. Mitigation Measures AQ-3(a) and AQ-3(b) would be required under Alternative 3. In addition, future development under the Fewer Sites Alternative would be required to comply with MBARD rules and Pacific Grove Municipal Code regulations that intend to reduce pollutant emissions.

Overall, air quality impacts under Alternative 3 would be reduced compared to the proposed project, but would remain less than significant with mitigation.

c. Biological Resources

The Fewer Sites Alternative would facilitate the development of housing and commercial uses at the same density as the proposed project but on a reduced number of housing sites, upzoning areas, and additional parcels. This alternative would eliminate 47 sites from the proposed project's inventory, resulting in an overall reduction in development potential and geographic extent. The remaining sites under this alternative are primarily located in more developed, commercial areas of Pacific Grove, including the Downtown, Central Eardley Commercial, Forest Hill Commercial, and Dennett and Sinex Districts.

As discussed in Section 4.3, *Biological Resources,* most of the potential impacts to biological resources are associated with housing sites that are currently undeveloped, including Sites 47, 49, 50, and 55, and additional parcels A1, A3, and A4. As shown in Table 6-3, Alternative 3 would not include Site 47 or additional parcels A1, A3, and A4. Accordingly, potential impacts to biological resources would be slightly reduced, as Site 47 and additional parcels A1, A3, and A4 would remain undeveloped under Alternative 3. Development would still be allowed in Sites 49, 50, and 55 under Alternative 3. Further, this alternative would facilitate the development of 1,344 fewer housing units than the proposed project, and construction activities under Alternative 3 would generally be less intense than what is anticipated to occur under the proposed project. As a result, impacts to known special-status species or their associated habitat, including through habitat modifications; impacts to sensitive Monterey pine communities and riparian habitat; and impacts to intermittent streams (present at Site 49) would be reduced compared to the proposed project.

As noted in Section 4.3, *Biological Resources,* once a site has been developed or re-developed, the proposed operational uses of individual sites would not result in substantial new operational impacts to special-status plants or wildlife beyond those occurring under existing baseline conditions. Similarly, operational impacts to riparian habitat, sensitive natural communities, and jurisdictional areas are nominal and less than significant. Thus, the reduced buildout associated with Alternative 3 would not measurably reduce operational impacts related to biological resources.

Development under the Fewer Sites Alternative would also be subject to federal, state, and local regulations pertaining to the protection of biological resources, and would require implementation of Mitigation Measures BIO-1(a) through BIO-1(i), BIO-3(a), and BIO-3(b), as outlined in Section 4.3, *Biological Resources*.

Overall, impacts to biological resources under Alternative 3 would be reduced compared to those under the proposed project due to the elimination of Site 47 or additional parcels A1, A3, and A4, which contain sensitive resources. Impacts would remain less than significant with mitigation.

d. Cultural Resources

Under the Fewer Sites Alternative, development would be concentrated on fewer sites as compared to the proposed project, eliminating 47 of the housing sites, upzoning areas, and additional parcels included in the proposed project's inventory. The City would continue to implement its Guidelines for Historic Assessments, , existing General Plan policies related to historical resources (which would not be amended by the project or this alternative), and Municipal Code regulations, which would provide protections for historical resources. Development under this alternative would continue to comply with the City's requirement to comply with the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings.

Because Alternative 3 would facilitate development of fewer sites than the proposed project, it would be less likely to result in impacts to the significance of historic resources. However, such impacts are possible, even with implementation of the City's Guidelines for Historic Assessments, policies, and regulations. Impacts to historical resources under Alternative 3 would be significant and unavoidable but reduced compared to the proposed project.

Alternative 3 would facilitate development in fewer sites compared to the proposed project, and would not facilitate development in several currently undeveloped sites (Site 47 and additional parcels A1, A3, and A4). Therefore, a reduced extent of ground disturbance would occur under this alternative, and the potential to impact one of the 56 known archaeological resources in Pacific Grove would be reduced. However, the potential to adversely impact archaeological resources and human remains would still exist. Mitigation Measures CUL-2(a) and CUL-2(b) would be required under this alternative, which would reduce potential impacts to a less than significant level. Alternative 3's impacts related to archaeological resources would be less than significant with mitigation and reduced compared to the proposed project.

Overall, impacts to cultural resources would be reduced compared to the proposed project given the reduced development footprint, but would remain significant and unavoidable.

e. Energy

As shown in Table 6-1**,** Alternative 3 would result in reduced buildout potential compared to the proposed project, as it would facilitate the development of 1,344 fewer housing units and the addition of 2,849 fewer people than the proposed project.

Construction activities under Alternative 3 would be less intensive than those under the proposed project due to the reduced development scale. With approximately 55 percent fewer housing units and a 50 percent reduction in new jobs, construction-related energy consumption would be proportionally lower. This reduction in construction activity would decrease temporary energy demand and the potential for wasteful or inefficient energy use.

Operational energy use would also be substantially reduced under Alternative 3. With a 55 percent reduction in projected population growth, long-term energy demands for building operations, transportation, and infrastructure would be lower. Alternative 3 would not result in the inefficient, wasteful, or unnecessary consumption of energy resources, and impacts would be less than those of the proposed project.

Overall, impacts related to energy would be reduced compared to the proposed project and would remain less than significant.

f. Geology and Soils

The Fewer Sites Alternative would result in reduced buildout potential compared to the proposed project, accommodating 2,849 fewer residents and 1,344 fewer housing units than the proposed project. Thus, compared to the proposed project, Alternative 3 would expose fewer people and structures to geologic and seismic hazards. Similar to the proposed project, Alternative 3 would include updates to the City's Health and Safety Element of the General Plan, including new and updated policies that identify and aim to avoid seismic and geologic hazards such as erosion, landslides, and groundshaking. This, combined with the overall reduced buildout, would reduce the risk of exposing people or structures to geologic and seismic hazards. Therefore, Alternative 3's impacts related to geology and seismicity would be reduced compared to the proposed project and would remain less than significant.

Alternative 3 would facilitate development on fewer sites compared to the proposed project by eliminating 47 sites from the housing inventory, including several currently undeveloped parcels (such as Site 47 and additional parcels A1, A3, and A4). As a result, the overall extent of ground disturbance would be reduced, thereby lowering the potential to impact paleontological resources. However, because Alternative 3 would still allow development on many of the same sites as the proposed project, some potential for adverse impacts to paleontological resources would remain. As with the proposed project, implementation of Mitigation Measure GEO-9 would be required to reduce these impacts to a less than significant level.

Overall, Alternative 3's impacts related to geology and soils would be reduced compared to the proposed project but would remain less than significant with mitigation.

g. Greenhouse Gas Emissions

As discussed in Section 4.7, *Greenhouse Gas Emissions,* potential impacts related to GHG emissions are assessed by determining if a project complies with adopted plans, programs, policies, and/or other regulatory strategies to reduce GHG emissions. Plans considered in this determination include the California Air Resources Board's 2022 Scoping Plan and AMBAG's 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy. The Fewer Sites Alternative would result in reduced buildout potential compared to the proposed project, as it would facilitate the development of 1,344 fewer housing units, a 55 percent reduction. GHG emissions would be reduced at a commensurate rate. Although the Fewer Sites Alternative would generate fewer GHG emissions than the proposed project, there is no adopted numerical threshold of significance for GHG emissions applicable to the project area. Therefore, the determination of impact significance is based on policy consistency rather than emissions volume.

Similar to the proposed project, development under Alternative 3 could include natural gas service and may not include electric vehicle infrastructure. Electrifying buildings and transit are key project attributes identified in the 2022 Scoping Plan as critical to achieving the state's climate goals. As a

result, the Fewer Sites Alternative would be inconsistent with the 2022 Scoping Plan's objectives, similar to the proposed project. Accordingly, while Alternative 3 would result in lower GHG emissions due to reduced development, it would be inconsistent with state and regional GHG reduction plans and policies to the same extent as the proposed project. As such, the impact related to GHG emissions under the Fewer Sites Alternative would be considered significant and unavoidable, similar to the proposed project.

h. Hazards and Hazardous Materials

Full buildout of Alternative 3 would accommodate fewer residents and fewer housing units than the proposed project. As shown in Table 6-1, Alternative 3 would facilitate the development of 1,344 fewer housing units and the addition of 2,849 fewer people than the proposed project.

Alternative 3 would facilitate development in fewer sites compared to the proposed project, and would result in less ground disturbance and fewer building alterations or demolitions. Therefore, this alternative would expose a reduced number of housing units and residents to potential hazards, as this alternative would have less potential for ground disturbance that could expose existing contaminated soils or hazardous materials, particularly in areas with a history of prior industrial or commercial use. Further, the likelihood of releasing hazardous substances during activities such as demolition of older structures that may contain lead-based paint, asbestos, or other legacy contaminants would be reduced compared to the proposed project.

Similar to the proposed project, development under the Fewer Sites Alternative would be required to comply with federal and state regulations, including but not limited to the Clean Air Act, the Comprehensive Environmental Response, Compensation, and Liability Act, the Toxic Substances Control Act, the California Health and Safety Code, the California Fire and Building Codes, and MBARD Rule 424, pertaining to the removal and disposal of asbestos-containing materials, polychlorinated biphenyls, and other hazardous materials. Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials during both construction and operation.

Overall, Alternative 3 would result in less potential for exposure to hazardous materials due to reduced amounts of ground disturbance. With compliance with existing regulations, impacts related to hazards and hazardous materials would be less than significant and would be reduced compared to the proposed project.

i. Hydrology and Water Quality

Under the Fewer Sites Alternative, future development would be located on a smaller number of housing sites, upzoning areas, and additional parcels, with development concentrated in already developed areas. As a result, this alternative would generate fewer new impervious surfaces, leading to reduced stormwater runoff. Consequently, the potential for erosion, sedimentation, and pollutant loading into local waterways would also be lower compared to the proposed project.

As with the proposed project, development facilitated by Alternative 3 would remain subject to the same regulatory framework. This includes compliance with the National Pollutant Discharge Elimination System permit requirements, the City's Municipal Code provisions related to stormwater management, and applicable General Plan goals and policies that protect water quality and manage hydrologic impacts.

Overall, the Fewer Sites Alternative would result in reduced hydrology and water quality impacts compared to the proposed project. With continued compliance with existing regulations and policies, impacts would remain less than significant.

j. Land Use and Planning

Similar to the proposed project, the Fewer Sites Alternative would involve the same zoning changes and proposed revisions to the City's Land Use Element. Further, Alternative 3 would facilitate development on some of the same housing sites, upzoning areas, and additional parcels as the proposed project. As determined in Section 4.10, *Land Use and Planning,* development of these sites would not physically divide an established community and would not cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, similar to the proposed project, Alternative 3 would not result in the physical division of an established community, and would not 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. Impacts would be less than significant and similar to the proposed project.

k. Noise

The Fewer Sites Alternative would involve 1,344 fewer housing units concentrated on fewer sites than the proposed project. As a result, construction-related noise and vibration would generally be less intense and less frequent than under the proposed project, and would be less geographically dispersed. Similarly, with approximately 2,849 fewer new residents, operational noise, including traffic-related noise, would also be reduced.

All development under Alternative 3 would be required to comply with the City's Noise Ordinance and the noise-related policies and programs in the existing General Plan (which would not be amended by the project or this alternative), which include requirements to analyze and mitigate significant noise impacts for projects requiring discretionary approval. Despite the lower level of development and compliance with policies and regulations, construction activities under the Fewer Sites Alternative would still generate temporary noise and vibration. Similar to the proposed project, development facilitated by Alternative 3 could be located adjacent to or nearby sensitive receptors, and noise levels from construction and operation may exceed the City's thresholds. Mitigation Measure NOI-1(a), NOI-1(b), and NOI-2 would be required to reduce construction noise, operational noise, and construction vibration. However, even with implementation of mitigation measures and compliance with local policies and regulations, construction noise and stationary noise may exceed the City's thresholds.

The Fewer Sites Alternative would reduce construction and operational noise impacts due to less development, and would comply with noise regulations, policies, and mitigation measures as required. However, similar to the proposed project, it is possible that construction noise may exceed acceptable thresholds in proximity to sensitive receivers. Impacts would be reduced compared to the proposed project, but would be significant and unavoidable.

l. Population and Housing

As shown in Table 6-1, Alternative 3 would accommodate a population increase of 2,101 people by 2031, or 2,849 fewer people than the proposed project. Alternative 3 would also involve the development of 991 housing units, or 1,344 fewer housing units than the proposed project. This

represents a 55 percent reduction in housing units and population and a 50 percent reduction in the number of new jobs compared to the proposed project.

Although Alternative 3 would allow for less population growth, this level of growth would still be greater than current growth projections for the city. As discussed in Section 4.12, *Population and Housing,* although growth would exceed local and regional population projections, this growth would not be unplanned as the Housing Element Update, General Plan amendments, and zoning changes would be undertaken to specifically plan for and accommodate this projected population and housing increase. Therefore, Alternative 3 would not result in substantial unplanned growth, similar to the proposed project.

Because Alternative 3 would facilitate development on fewer sites than the proposed project, the displacement of people or housing units as a result of Alternative 3 would be reduced compared to the proposed project. Alternative 3's impacts related to population and housing would be less than significant and reduced compared to the proposed project.

m. Public Services and Recreation

The Fewer Sites Alternative would accommodate 2,849 fewer residents and 1,344 fewer housing units than the proposed project. Similar to the proposed project, growth anticipated under Alternative 3 would exceed regional projections and growth currently anticipated by the City; however, growth under Alternative 3 would be reduced compared to the proposed project. Therefore, Alternative 3 would generate less localized demand for fire, police, school, library services, and recreation facilities compared to the proposed project.

As discussed in Section 4.13, *Public Services and Recreation,* the proposed project would not result in the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts. Because of its reduced level of development, Alternative 3 would similarly not require new or altered government facilities. Impacts would be less than significant and reduced compared to the proposed project.

n. Transportation

When compared to the proposed project, the Fewer Sites Alternative would result in the addition of 2,849 fewer residents and 200 fewer jobs. The average daily vehicle trips that would have been generated by these residents and employees under the proposed project would not occur, which would reduce VMT. In addition, Alternative 3 would facilitate housing development in more densely-developed commercial areas, such as the Downtown, Central-Eardley Commercial, Forest Hill Commercial, and the Dennett and Sinex Districts. Therefore, it can be assumed that future residents under Alternative 3 would be located closer to where they work, shop, or go to school, and vehicle trips would generally be shorter under this alternative. Therefore, the VMT per capita and per employee under Alternative 3 would be less than that of the proposed project. Alternative 3's impacts related to VMT would be less than significant and would be reduced compared to the proposed project.

Similar to the proposed project, development facilitated by Alternative 3 would comply with regulations and policies in the City's Municipal Code and General Plan related to maintaining emergency access and avoiding transportation hazards. Impacts would be less than significant and similar to the proposed project.

Overall, transportation impacts would be reduced compared to the proposed project and would remain less than significant.

o. Tribal Cultural Resources

As discussed in Section 4.15, *Tribal Cultural Resources,* no tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources were identified within the project area. In addition, no tribal cultural resources were identified within or near the project area that have been determined by the City of Pacific Grove, as the CEQA lead agency, to be significant. Therefore, development in the city under Alternative 3, similar to the proposed project, would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k) or that is a resource determined by Pacific Grove (the lead agency), in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). Alternative 3 would have no impact to tribal cultural resources, similar to the proposed project.

p. Utilities and Service Systems

The Fewer Sites Alternative would accommodate 2,849 fewer residents and 1,344 fewer housing units than the proposed project, and would result in reduced demand for wastewater, stormwater, natural gas, electricity, telecommunications, and solid waste infrastructure and services compared to the proposed project. As demonstrated in Section 4.16, *Utilities and Service Systems,* the project would be served by sufficient infrastructure and capacity; given the reduced buildout that would occur under Alternative 3, existing systems would continue to have sufficient capacity to serve this alternative without the need for new or expanded facilities that could result in physical environmental impacts.

As shown in Table 4.16-2 in Section 4.16, *Utilities and Service Systems,* the per capita water demand by the year 2035 is projected to be 0.13 AFY per person. This projected water demand is appropriate to use for the purpose of this alternatives analysis, as water demand by 2035 would be inclusive of demand that would exist by the project's buildout year of 2031. The Fewer Sites Alternative would result in 2,101 new residents, which would result in an additional water demand of approximately 273 AFY[4] by 2035. This additional demand would be approximately 55 percent less than the additional demand associated with the proposed project, which would be 635 AFY by 2035 (see Table 4.16-3 in Section 4.16). As shown in Table 4.16-7 in Section 4.16, this additional demand could be accommodated by existing water supply and projected future supplies, assuming the MPWSP Ocean Desalination Plant comes online. However, should the MPWSP Ocean Desalination Plant fail to be constructed and operational by 2030, a shortfall could occur and sufficient water supplies may not be available for development facilitated by Alternative 3 and reasonably foreseeable development in the region. Similar to the proposed project, Alternative 3 would require implementation of Mitigation Measure UTIL-2, which would require verification of water supply for specific development prior to the City's approval of that development. Therefore, Alternative 3's impacts related to water supply would be less than significant with mitigation, yet reduced compared to the proposed project.

As discussed in Section 4.16.3 and shown in Table 4.16-1 of Section 4.16, *Utilities and Service Systems,* wastewater generation can be estimated for residential and commercial uses using factors of 120 GPD per residential unit and 35 GPD per employee. As shown in Table 6-1, the Fewer Sites Alternative would result in the addition of 991 housing units and 200 jobs compared to existing conditions. Multiplying 991 housing units by 120 GPD and 200 jobs by 35 GPD, the Fewer Sites

[4] 2,101 additional residents multiplied by 0.13 AFY per person equals approximately 273 AFY.

Alternative would result in the generation of approximately 118,900 GPD of wastewater for residential uses and 7,000 GPD of wastewater for commercial uses, for a combined additional wastewater generation of 125,900 GPD. As shown in Table 4.16-1 in Section 4.16, the proposed project would result in the generation of 294,200 GPD of wastewater. Accordingly, the Fewer Sites Alternative would generate approximately 55 percent less wastewater compared to the proposed project. As discussed in Section 4.16, *Utilities and Service Systems,* the Regional Wastewater Treatment Plant would have sufficient capacity to accommodate wastewater generated by the proposed project, and accordingly would have sufficient capacity for the Fewer Sites Alternative. Impacts would be less than significant and reduced compared to the proposed project.

As discussed in Section 4.16.3 of Section 4.16, *Utilities and Service Systems,* solid waste generation can be estimated for residential and commercial uses using CalRecycle's solid waste generation rates of 5.31 pounds per housing unit per day and 10.53 pounds per employee per day. As shown in Table 6-1, the Fewer Sites Alternative would result in the addition of 991 housing units and 200 jobs compared to existing conditions. Multiplying 991 housing units by 5.31 pounds per day and 200 employees by 10.53 pounds per day, the Fewer Sites Alternative would result in the generation of approximately 5,260 pounds of solid waste per day from residential uses and 2,105 pounds of solid waste per day from commercial uses, for a total of an additional 7,365 pounds of solid waste per day. As discussed under Impact UTIL-3 in Section 4.16, the proposed project would generate an estimated 16,611 pounds of solid waste per day. Accordingly, the Fewer Sites Alternative would generate approximately 55 percent less solid waste than the proposed project. The Monterey Peninsula Landfill has a maximum throughput of 3,500 tons per day; solid waste generated by the No Project Alternative would account for less than 0.1 percent of the maximum throughput. Therefore, the Fewer Sites Alternative would not generate solid waste in excess of state or local standards. Impacts would be less than significant and reduced compared to the proposed project.

Overall, the Fewer Sites Alternative would result in reduced demand for utilities and service systems due to lower development intensity. Mitigation Measure UTIL-2 would require verification of water supply for specific development prior to the City's approval of that development. Therefore, Alternative 3's impacts related to utilities and service systems would be less than significant with mitigation yet reduced compared to the proposed project.

q. Wildfire

The Fewer Sites Alternative would accommodate 2,849 fewer residents and 1,344 fewer housing units than the proposed project, and would result in fewer new structures and fewer people located in areas subject to wildfire risk. In addition, under the Fewer Sites Alternative, development would be excluded from 19 sites located within designated Fire Hazard Severity Zones (FHSZ). Specifically, this alternative would eliminate development on Sites 32, 34 and37, Site 57, and additional parcels A3–A9 in the Very High FHSZ; Sites 24, 25, and 28 in the High FHSZ; and Site 23 along with additional parcels A10 and A11 in the Moderate FHSZ. By removing these sites from the housing inventory, Alternative 3 would reduce the number of new structures and residents exposed to elevated wildfire risk compared to the proposed project.

Alternative 3 would also involve updates to the City's Health and Safety Element, which contains new and revised policies aimed at reducing wildfire risk and improving community resilience. In addition, all development would continue to comply with existing emergency response and evacuation plans, as well as applicable state and local fire safety regulations.

Overall, the Fewer Sites Alternative would result in fewer people and structures located in wildfire-prone areas, thereby reducing the potential for exposure to wildfire hazards and the risk of exacerbating wildfire conditions. Impacts related to wildfire would be less than significant and reduced compared to the proposed project.

6.5 Environmentally Superior Alternative

Table 6-4 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied. Based on the alternatives analysis provided above and the summary in the table below, Alternative 3, the Fewer Sites Alternative, would be the environmentally superior alternative.

Alternative 3 assumes adoption and implementation of the Housing Element Update, General Plan amendments, and zoning amendments, but with a substantially reduced housing site inventory, eliminating development from 47 sites than would be included in the proposed project. Development would be concentrated on 22 sites, primarily located in already urbanized, commercial areas such as the Downtown, Central-Eardley Commercial, Forest Hill Commercial, and Dennett and Sinex Districts.

This more compact development pattern would reduce the overall scale and geographic footprint of new construction, resulting in fewer new structures, less ground disturbance, and reduced exposure to wildfire risk. By avoiding development on sites located in FHSZs and in areas with greater potential for biological, hydrological, and aesthetic sensitivity, Alternative 3 would reduce impacts related to erosion, stormwater runoff, habitat disruption, and visual character. Additionally, the lower buildout would accommodate 2,849 fewer residents and 1,344 fewer housing units, reducing demand for public services, utilities, and transportation infrastructure, and lowering emissions and energy use.

While Alternative 3 would not eliminate any significant and unavoidable impacts of the project (those related to cultural resources, GHG emissions, and noise), it would reduce the severity of these impacts compared to the proposed project. It would also meet most of the project's objectives, though it would not fully achieve the goals of encouraging by-right development on existing 4th and 5th Cycle housing sites or dispersing housing sites throughout the city to avoid overconcentration.

Nonetheless, by reducing both the intensity and extent of development while still advancing the City's housing goals, Alternative 3 is the environmentally superior alternative.

Table 6-4 Impact Comparison of Alternatives

Impacts	Proposed Project[1]	Alternative 1: No Project Alternative	Alternative 2: Reduced Density	Alternative 3: Fewer Sites
Aesthetics	LTS	<	<	<
Air Quality	LTSM	<	<	<
Biological Resources	LTSM	=	=	<
Cultural Resources	SU	<	=	<
Energy	LTS	<	<	<
Geology and Soils	LTSM	<	<	<
Greenhouse Gas Emissions	SU	>	=	=
Hazards and Hazardous Materials	LTS	<	=	<
Hydrology and Water Quality	LTS	<	=	<
Land Use and Planning	LTS	<	=	=
Noise	SU	<	<	<
Population and Housing	LTS	<	<	<
Public Services and Recreation	LTS	<	<	<
Transportation	LTS	>	=	<
Tribal Cultural Resources	NI	=	=	=
Utilities and Service Systems	LTSM	<	<	<
Wildfire	LTS	<	<	<
Impact Summary		**13 <** **2 =** **2 >**	**9 <** **8 =** **0 >**	**14 <** **3 =** **0 >**

Where multiple impact determinations are identified, the highest level (or most severe) impact determination is listed.

Note: Comparison of impacts is based on the overall impact of the alternative on the resource or issue.

< Alternative impacts would be less than those of the proposed project , = Alternative would result in impacts similar to the proposed project, > Alternative impacts would be greater than those of the proposed project

NI = no impact, LTS = less than significant, LTSM = less than significant with mitigation, SU = significant and unavoidable

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Introduction

No references are cited in this section.

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Other CEQA-Related Discussions

No references are cited in this section.

Alternatives

No references are cited in this section.

7.2 List of Preparers

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