ERRATA TO THE JUNE 2020 FINAL ENVIRONMENTAL IMPACT REPORT GUENOC VALLEY MIXED-USE DEVELOPMENT PROJECT

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1.0 INTRODUCTION

Review of the Guenoc Valley Mixed Use Planned Development Project (Project) by the Lake County Community Development Department (Department) in order to respond to late filed comments received from the public and government agencies on the Project's Environmental Impact Report (EIR) has resulted in the request for minor revisions and clarifications to the EIR to assist the Board of Supervisors in its review and decision-making regarding the Project. This Errata document to the June 2020 Final EIR includes minor edits and clarifications to the EIR analysis and mitigation measures, none of which constitute significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed project or a feasible way to mitigate or avoid such an effect. See Public Resources Code § 21092.1;CEQA Guidelines § 15088.5(a). All of the revised information clarifies, amplifies, or makes insignificant modifications that do not affect the adequacy of the EIR. Id. at § 15088.5(b). Therefore, recirculation of the EIR is not warranted or required.

The following chapters have been revised:

- Volume I, Section 4.0, MMRP;
- Volume II, Section 2.0 Project Description
- Volume II, Section 3.4 Biological Resources;
- Volume II, Section 3.7 Greenhouse Gas Emissions;
- Volume II, Section 3.9 Hydrology
- Volume II, Section 3.13 Transportation and Traffic; and
- Volume II, Section 3.16 Wildfire.
- Volume III, Appendix TDM

Specifically, the Errata clarifies or amplifies the Department's analysis and, in some instances, includes revised mitigation measures to further address or respond to late filed comments as described below.

2.0 CHANGES TO THE FINAL EIR

As discussed above, revisions have been made to the text of the Guenoc Valley Mixed Use Development Project Final EIR subsequent to the County's posting of this document on its website on June 12, 2020. Overall revisions and changes made to sections of the Final EIR are summarized below. Headings correspond with section headings of the Final EIR. Sections that did not warrant significant revisions are not discussed further.

VOLUME I, SECTION 4.0 MITIGATION MONITORING AND REPORTING PLAN

The MMRP included in Volume I of the Final EIR, Section 4.0, has been revised to include a new section 4.2 entitled "Project Commitments:

4.2 Project Commitments

In addition to mitigation responsibilities listed in **Table 4-1**, the Applicant has committed to the certain actions that would reduce the environmental effects of the project, including effects related to wildfire prevention and response. A number of project commitments are outlined in **Table 4-2**, along with the timing, responsible party for implementation, and responsible party of monitoring. It should be noted that **Table 4-2** is not inclusive of all of the project's environmental commitments. Other measures may be described in the Final EIR, Volume II, Section 2.0 Project Description, and the appendices cited therein, including but not limited to the Design Guidelines (**Appendix DG**) and zoning ordinance requirements (**Appendix GVD**).

Additionally the MMRP Table 4-1 has been updated to reflect the changes and additions to the mitigation measures referenced later in this section, and a new Table 4-2 Project Commitments has been added. For simplicity, the entire text of the MMRP including Tables 4-1 and 4-2 have been included in **Attachment A** to this Errata document. The following mitigation measures have been supplemented or refined as described later in this Errata:

- MM 3.4-15 Impacts to Sensitive Habitats
- MM 3.4-17 Aquatic Resources Protection and Management
- MM 3.7-1 Operational GHG Emissions
- MM 3.9-3 Off-Site Groundwater Well Safe Yield Analysis and Monitoring
- MM 3.9-4 Floodplain Analysis (Impact 3.9-4)
- MM 3.13-4 Implement a Transportation Demand Management Program

Revisions to the MMRP Table 4-1 MMRP are provided as **Attachment A** of this document.

VOLUME II, SECTION 2.0 PROJECT DESCRIPTION

Section 2.7.1 Lead Agency Approvals: County of Lake

The following changes were made to Volume II, Section 2.7.1 Lead Agency Approvals on page 2-71 and page 2-71 of the Final EIR:

2.7.1 LEAD AGENCY APPROVALS: COUNTY OF LAKE

The County is the Lead Agency for the Proposed Project. In summary, the following County actions and approvals are proposed:

- Amendment to the General Plan and Special Study Area map of the Middletown Area Plan to include the area commonly known as the college parcels; amendment to General Plan Land Use Map designations from Agriculture, Resource Conservation, Rural Lands, and Rural Residential to Resort Commercial (GPAP 18-01); amendment to General Plan Land Use Policy LU 6.12 to include the following provision: "6.12.3: The provisions of LU-6.12.1 and 6.12.2 shall not apply to the Langtry/Guenoc Special Study Area of the Middletown Area Plan;

The following changes were made to Volume II, Section 2.7.1 Lead Agency Approvals, General Plan and Area Plan Amendment on page 2-72 of the Final EIR:

General Plan and Area Plan Amendment

The current General Plan Land Use Map designates the Guenoc Valley Site as primarily Rural Lands, with certain areas of the site designated as Rural Residential, Agricultural, and Resource Conservation. Under the Proposed Project, the General Plan Land Use Map designation of the Guenoc Valley Site would be amended to Resort Commercial.

The current Middletown Area Plan identifies the Guenoc Valley Site as a Special Study Area. One section known as the college parcels is currently outside the Special Study Area as it was not a part of the Guenoc Ranch when the Middletown Area Plan was updated in 2010 (refer to **Section 3.2**, Land Use, for further discussion). This area was gifted to the County for development of a California State University Campus but was found to be unsuitable for this purpose. As a result, the ownership reverted back to the owner of Guenoc Ranch and the area is now part of the Guenoc Valley Site. An amendment to the Special Study Area map is requested to include this area. The Middletown Area Plan is a supplement to the General Plan and thus the amendment to the Special Study Area results in an amendment to the General Plan.

General Plan Land Use Policy LU 6.12 limits the proportion of residential development that would be allowed with a Mixed Use Resort. The policy states that the residential component of a Mixed Use Resort shall not allow more residential units than resort units, unless the project is adjacent to a Community Growth Boundary, and other certain criteria

are met. General Plan Policy LU 6.12 is proposed to be revised to include the following new Section 6.12.3:

6.12.3: "The provisions of LU-6.12.1 and 6.12.2 shall not apply to the Langtry/Guenoc Special Study Area of the Middletown Area Plan".

The Middletown Area Plan specifically identifies study areas where the plan envisions "innovative resort/residential communities", rather than resort communities with ancillary residential uses. General Plan Policy LU-1.2 states "The County shall promote flexibility and innovation through the use of planned unit developments, development agreements, specific plans, mixed use projects, and other innovative development and planning techniques." A blanket limit on residential uses associated with resort development limits innovation, especially in context of mixed-use planned development. For this reason, this General Plan policy will be revised to not apply to the Middletown Area Plan Langtry/Guenoc Special Study Area, in order to further innovative mixed use development consistent with General Plan, and Middletown Area Plan goals and policies. With this addition, the Guenoc Valley project would be consistent with General Plan Land Use policy LU-6.12 as amended.

VOLUME II, SECTION 3.4 BIOLOGICAL RESOURCES

Mitigation Measure 3.4-15

The following changes were made to Mitigation Measure 3.4-15 Impacts to Sensitive Habitats in Volume II, Section 3.4, page 3.4-96 of the Final EIR:

MM 3.4-15 Impacts to Sensitive Habitats

Sensitive habitats shall be avoided to the maximum extent feasible. In areas where full avoidance of sensitive habitat types is not possible, mitigation shall occur as described below. This mitigation shall be applicable to impacts for purple needlegrass, musk-brush chaparral, white alder grove, Brewer willow thicket, Sargent cypress forest, and native grasslands:

1) Preservation of in-kind habitat shall occur at a minimum ratio of 2 acre:1 acre.
2) Areas designated for preservation shall be maximized within identified protection areas, such as sensitive habitats within Habitat Connectivity Easement Areas. Sensitive habitats within the Open Space Combining District that are not required to mitigate for impacts to POU resulting from vineyard development approved in the 2009 FEIR may be used for the purpose of this mitigation.
3) Preservation of in-kind habitat that occurs within residential lots shall occur only within open space prohibited from development (including landscaping and agricultural uses) by the Design Guidelines, or through the establishment of habitat easements within the residential lots. Preservation of sensitive habitat for the purposes of mitigation that occurs within

deed-restricted open space shall be identified within the deed restriction and shall prohibit the development of that area identified for preservation. Preservation within deed-restrictions shall be preserved in perpetuity as a condition of the deed.

4) Areas that area preserved for in-kind habitat that occur outside of residential lots, Habitat Connectivity Easement Areas, and the Open Space Combining District shall be avoided during future phases of development. Should unavoidable impacts to in-kind habitat preservation areas occur during future phases of construction, those impacts shall be subject to additional compensatory actions set forth in this mitigation. Should insufficient habitat occur to offset future impacts, a compensatory habitat restoration, enhancement, and/or creation mitigation measure shall be prepared and approved by the County prior to on the ground impacts of future development phases.
5) Those areas selected for preservation shall be provided on a map to the County and approved by the County.

Preservation of in-kind habitat shall be the preferred method of mitigation when possible. The Applicant may additionally satisfy the 2:1 mitigation ratio through restoration, creation, and/ or enhancement of in-kind habitat. “In-kind” requires that habitats meet the classification criteria of their respective vegetative community as defined during the appropriate biological surveys. Mitigation performed through restoration, creation, or enhancement shall be monitored for a minimum of five years by a qualified biologist. The biologist shall prepare an annual report on the status of mitigation activities along with adaptive management recommendations as necessary. These reports shall be maintained by the Applicant and available to agencies upon request. Success criteria shall be as follows and shall require additional years of monitoring and management should mitigation fail to meet success criteria:

- Purple needlegrass and native grasslands shall achieve a percent native plant cover that meets or exceeds that of the habitat impacted. Non-sensitive grasslands and herb-dominated habitat types are suitable for restoration and creation activities.
- Musk-brush chaparral shall be restored in non-sensitive suitable habitat. Mitigation shall occur at a 2:1 acre ratio and shall achieve a 75 percent acreage establishment. The monitoring biologist shall consider percent cover, species composition, overall health of plantings, and other indicators when determining success of establishment.
- White alder grove and Brewer willow thicket may be restored along riparian corridors where invasive species or bank stabilization issues have occurred. Mitigation shall occur at a 2:1 acre ratio and shall achieve a 75 percent acreage enhancement. The monitoring biologist shall consider percent cover, species composition, bank stability, overall health of plantings, and other indicators when determining success of establishment.
- Sargent cypress forest shall be enhanced through the removal of competing foothill pines at an acreage ratio of 2:1 once annually for a total of five years and/or Sargent cypress trees shall be replanted at a 2:1 ratio and monitored for a total of five years. Replanting shall achieve a 75 percent success rate.

Mitigation Measure 3.4-17

The following changes were made to Mitigation Measure 3.4-17 Aquatic Resources Protection and Management in Volume II, Section 3.4, page 3.4-99 of the Final EIR:

MM 3.4-17 Aquatic Resources Protection and Management

Consistent with governing regulations and policies, the following setbacks shall be incorporated into the project design:

- 30 feet from the top of bank of perennial streams;
- 20 feet from the top of bank of any intermittent stream;
- 20 feet from the edge of any adjacent wetlands or the ordinary high water mark of ephemeral streams or other bodies of water (including reservoirs and lakes); or
- To the outer extent of a riparian corridor.

No setback is required or recommended for man-made stormwater or irrigation ditches. Should additional analysis of these features performed by a qualified biologist that determines larger setbacks are needed to ensure full protection of habitat based on factors such as slope, setbacks up to fifty feet may be required as possible and dictated by the conditions observed and analyzed.

The setback distances identified above shall be delineated by a qualified biologist with high-visibility fencing or flagging prior to any construction activities occurring within 200 feet of the aquatic habitat features. No construction work or equipment staging shall occur within the setbacks unless a variance or permit is authorized to allow it. Prior to impacts, consultation shall occur with USACE and the RWQCB to determine the extent of federal and state jurisdictional wetlands and waters. A CWA Section 404 permit shall be obtained from USACE for impacts to any identified wetlands and waters subject to CWA jurisdiction, along with RWQCB state water quality certification for such permit under CWA Section 401, as necessary. An LSAA with CDFW shall be entered for those impacts to any identified streams subject to Fish and Game Code Section 1600 jurisdiction. Any necessary permits and approvals shall be obtained prior to the respective impacts for which they are required, and conditions of permits and approvals acquired for the Proposed Project shall be met. Mitigation shall occur consistent with the necessary permits and approval conditions required for the Proposed Project. Mitigation for direct impacts to aquatic habitats shall occur through a combination of habitat preservation, creation, or restoration/enhancement and shall, at a minimum, include the following:

- Should mitigation for aquatic resources occur through preservation, preservation shall occur at a minimum ratio of 2:1. Areas designated for preservation shall be maximized within the Open Space Combining District or within Habitat Connectivity Easement Areas, and may only occur within residential lots if preservation in perpetuity as a condition of the deed-restricted open space for the lot. Those areas selected for preservation shall be approved by the County and be subject to the compensatory

actions set forth in this mitigation and necessary permit or approval conditions should future impacts to preserved habitats be identified.

- When mitigation occurs through the restoration or enhancement of habitat, mitigation shall occur at a minimum ratio of 2:1. Restoration and/or enhancement of habitat shall occur within the Open Space Combining District or within Habitat Connectivity Easement Areas as possible. Monitoring of mitigation activities shall be performed by a qualified biologist for a minimum of three years consistent with the terms of necessary permits. The qualified biologist shall prepare an annual report on the progress of mitigation with recommended management actions. Mitigation shall be deemed complete once the qualified biologist has determined that the success of restoration or habitat enhancement activities meets or exceeds 80 percent (measured either in acres or linear feet). Enhancement and restoration activities may include, but are not limited to, planting of native riparian or wetland vegetation, stabilization of banks, creating a natural channel along areas of manmade drainages, addition of habitat enhancement features that provide refugia or other important features for wildlife that may utilize the habitat, or removal of non-native vegetation.
- When mitigation occurs through the creation of habitat, creation shall occur at a minimum ratio of 1:1. A qualified biologist shall monitor habitat creation activities on an annual basis for a minimum of five years, and shall provide an annual report of these monitoring activities along with recommendations in order to ensure success of habitat creation. Following completion of habitat creation activities, a qualified biologist shall prepare an annual report on the progress of mitigation with recommended management actions. Mitigation shall not be deemed complete until the full 1:1 creation ratio has been met.
- In cases of conflict between permit terms and measures presented herein, those permit terms and conditions shall supersede those presented within this EIR. Alternative forms of mitigation not detailed above may serve to satisfy mitigating requirements to jurisdictional wetlands and waters as dictated by the appropriate permit(s). Alternative forms of mitigation include purchase of habitat credits from an approved mitigation bank at a ratio not less than 2:1, or payment of in-lieu fees as set by the appropriate agency.

VOLUME II, SECTION 3.7 GREENHOUSE GAS EMISSIONS

Impact 3.7-1

The following changes were made to Impact 3.7-1 in Volume II, Section 3.7 Greenhouse Gas Emissions, page 3.7-13 of the Final EIR:

- Electric fleet for the resort commercial uses (no less than 75 percent)

Mitigation Measure 3.7-1

The following changes were made to Mitigation Measure 3.7-1 in Volume II, Section 3.7 Greenhouse Gas Emissions, page 3.7-16 through 3.7-18 of the Final EIR:

MM 3.7-1 Operational GHG Emissions

Prior to the issuance of the first certificate of occupancy for the relevant portion of the project (i.e., residential or commercial), as appropriate, the Applicant shall provide documentation to the County that the following measures have been achieved. It should be noted that these measures do not apply to on-going uses within the property that are not a component of the Proposed Project, including agricultural operations conducted under third party leases.

Transportation Demand Management Measures
Implement Mitigation Measure 3.13-4 to develop and implement a transportation demand management plan to achieve a reduction in vehicle miles traveled as a result of the Proposed Project. At a minimum these measures will include:

- Dedicate on-site parking for shared vehicles (vanpools/carpools).
- Provide adequate, safe, convenient, and secure on-site bicycle parking and storage in the commercial portion of the project.
- Use of an electric fleet for internal transport vehicles (excluding trucks and other ranch vehicles for on-going agricultural and grazing activities) to the extent feasible (no less than 75 percent), including the golf course.

Project Wide Measures

- Use energy-efficient lighting that will reduce indirect criteria pollutants and GHG emissions. Using energy-efficient lighting will reduce energy usage and, thus, reduce the indirect GHG emissions from the project. Energy-efficient lighting includes adaptive lighting systems or systems that achieve energy savings beyond those required by Title 24 lighting requirements to the maximum extent feasible.
- Utilize low-flow appliances and fixtures;
- Use of state-of-the-art irrigation systems that reduce water consumption including graywater systems and rainwater catchment;

- Use of drought-tolerant and native vegetation

Residential Measures

- Facilitate achievement of zero net energy buildings through installation of solar photovoltaic systems consistent with the 2019 Building Energy Efficiency Standards, CCR Title 24 Part 6. Compliance with this requirement must be demonstrated prior to issuance of occupancy permits for residential uses.
- Provide electrical outlets on the outside of the homes or outlets within the garages to encourage the use of electrical landscaping equipment.
- Use water efficient landscapes and native/drought-tolerant vegetation.
- Install smart meters and programmable thermostats.
- Use energy-efficient appliances in the residences where available. These include appliances that meet USEPAs Energy Star Criteria.

Resort/Commercial Measures

- Facilitate achievement of zero net energy buildings through the construction standards required under the 2019 Building Energy Efficiency Standards, CCR Title 24 Part 6 and the use of rooftop or on-site photovoltaic systems, with or without storage, or the acquisition of renewable energy or energy credits from another source, or generation onsite. Zero Net Energy shall mean that on a community-wide basis, the actual annual consumed energy will be less than or equal to the renewable generated energy utilized. It is the Project's goal to obtain enough renewable electrical energy for the Project's needs and to distribute it throughout the Guenoc Valley Site. Therefore, renewable energy supplies shall be secured and/or systems installed for each commercial structure prior to issuance of its final certificate of occupancy.
- Install on-site charging units for electric vehicles consistent with parking requirements in California Green Building Standards Code Section 5.106.5.2.
- Install electric water heating instead of gas water heating for some or all of the project's hot water needs, to the extent such technology is readily available and commercially practicable.

Purchase GHG Credits

Prior to the issuance of building permits, the Applicant shall purchase GHG emission credits from a CARB approved registry source or project to offset the difference between the mitigated project emissions and the recognized 2030 service population thresholds. The credits must be established using CARB-consistent protocols and permanently retired. The table below converts the service population thresholds to metric tons per year based on the service population of the Proposed Project. Additionally, the table illustrates the difference between the total project emissions and the thresholds. Therefore, prior the issuance of building permits for Phase 1, the Applicant shall purchase 14,865 carbon offset credits.

OPERATIONAL GHG EMISSIONS - MITIGATED

Category		Year 2030		
		Phase 1	Future Phases	Total All Phases
		MT CO_2e per year		
Total Project Emissions		18,973	11,873	30,846
Service Population (Residents + Employees[1])		*1,580*	*2,990*	*4,570*
Service Population Project Emissions		*12.0*	*4.0*	*6.7*
BAAQMD Threshold (MT CO_2e/SP)[2]		2.6	2.6	2.6
BAAQMD Service Pop Threshold Converted to total MT CO_2e[3] per year		4,108	7,774	11,882
Total Annual Project Emissions Above Threshold		**14,865**	**4,099**	**18,964**

Notes:

1. Service population for Phase 1 includes both the project population increase from Phase 1 residential units and workforce housing, plus the 300 employment positions that would be generated. Service population for Future Phases includes the estimated population increase from future phases residential units and workforce housing, plus an estimated 200 employment positions.
2. 2030 service population threshold adjusted to account for 2017 Scoping Plan Update 40% Reduction Goal by 2030.
3. Calculated by multiplying the service population threshold by the service population of the project.

VOLUME II, SECTION 3.9 HYDROLOGY AND WATER QUALITY

Impact 3.9-4

The following changes were made to Impact 3.9-4 in Volume II, Section 3.9 Hydrology and Water Quality page 3.9-49 of the Final EIR:

Off-Site Workforce Housing – Project Level Analysis

As described in **Section 3.9.2** above, the Middletown Housing Site is mapped within the 100-year floodplain. Development on the project site would avoid the Regulatory Floodway along the western edge of the property. Development would be restricted to the area of the project site mapped as Zone AO with a flooding depth of two feet. As described in **Section 2.6.1**, the housing development would be constructed on fill so that the finished lower floors of the residential buildings would be at least one foot above the base flood elevation. This would ensure that the Project meets County requirements for buildings in flood zones. Elevation of the buildings would ensure that the proposed housing would not be subject to inundation. However, the increase of fill on the Middletown Housing Site has the potential

to divert floodwaters to adjacent areas, potentially increasing the flood elevation or extent of flooding off of the site. In addition, any improvements to Santa Clara Road and Park Avenue to provide access to the site also have the potential to change drainage patterns in the vicinity. The potential increase in flood extent or elevation in the vicinity could increase the potential for the release of pollutants to flood waters if any homes, buildings or stored equipment on neighboring properties are flooded. Flooding could release typical hazardous materials such as fuels, oil, chemicals, pesticides, fertilizer or cleaning products. With implementation of **Mitigation Measure 3.9-4**, which requires floodplain analysis and adequate drainage provisions, the risk of release of pollutants would be **less than significant**.

Mitigation Measure 3.9-3

The following changes were made to Mitigation Measure 3.9-3 in Volume II, Section 3.9 Hydrology and Water Quality, page 3.9-56 of the Final EIR:

MM 3.9-3 Off-Site Groundwater Well Safe Yield Analysis and Monitoring (Impact 3.9-2)

Prior to the issuance of an encroachment permit or grading permit for installation of off-site water line along Butts Canyon Road for the use of the off-site agricultural well for water supply on the Guenoc Valley Site, the Applicant shall provide to the County an analysis that defines the safe yield. The safe yield must be set to meet the following performance criteria: avoid drawdown of groundwater beyond 300 feet of the well. The analysis must incorporate pump testing of the well, and be certified by a Registered Professional Engineer or Registered Geologist. Groundwater pumping rates and durations must be limited to the safe yield determined in the hydraulic analysis. The safe yield analysis shall identify the location of one or more monitoring wells necessary to evaluate compliance with the performance criteria. Monitoring of groundwater pumping rates and durations and groundwater levels shall be performed quarterly for the first ten years of use. The Applicant shall be required to submit annual monitoring reports that provide quarterly groundwater pumping and groundwater level data to the Lake County Health Services Department for the first ten years of use. In the event these reports show an impact to the groundwater levels, the Lake County Health Services Department and the applicant shall come up with a Groundwater Management Plan in coordination with a geotechnical engineer for approval by the Community Development Director.

Mitigation Measure 3.9-4

The following changes were made to Mitigation Measure 3.9-4 in Volume II, Section 3.9 Hydrology and Water Quality, page 3.9-56 of the Final EIR:

MM 3.9-4 Floodplain Analysis (Impact 3.9-4)

Prior to the issuance of a grading permit for any development within 1,500 feet of Bucksnort Creek or Putah Creek, the Applicant shall provide to the County a floodplain analysis certified by a Registered Professional Engineer. This analysis shall define the extent of floodwaters (floodplain) and the elevations associated with 100-year flood event within proposed development areas along these creeks. If, due to the performed analyses, the changes in the effective Floodplain Maps and Flood Insurance Studies occur, the Developer will apply for a Letter(s) of Map Revision (LOMR) with the FEMA.

Prior to the issuance of a grading permit for development of the Middletown Housing Site, including off-site improvements, the Applicant shall provide to the County a floodplain analysis certified by a Registered Professional Engineer. The analysis shall identify any changes in the extent of the 100-year floodplain or changes in flood depths within 750 feet of the Middletown Housing Site that would occur as the result of the proposed housing development and associated improvements. Drainage features shall be incorporated into the project design to ensure that the development will not increase the extent or depth of flooding in adjacent areas. These features may include the additional of drainage swales or larger detention basin capacity within the site.

VOLUME II, SECTION 3.13 TRANSPORTATION AND TRAFFIC

Mitigation Measure 3.13-4

The following changes were made to Volume II, Section 3..13 Transportation and Traffic, page 3.13-36 of the Final EIR:

MM 3.13-4 Implement a Transportation Demand Management (TDM) Program

Prior to issuance of occupancy permits for Phase 1, the Applicant shall develop and submit to the County a final Transportation Demand Management Program for the Proposed Project. The TDM plan shall identify all feasible measures to reduce the VMT per capita of the Proposed Project to below the regional average to the extent feasible. <u>The goal of the TDM Program shall be a 15 percent in reduction in the VMT generated by the Proposed Project.</u> The County shall verify compliance with the plan prior to issuance of occupancy permits for the Proposed Project. Additionally, the Applicant shall undertake annual monitoring and reporting of the TDM Plan, in accordance with Section 1.4 of **Appendix TDM**. Section 1.4 of **Appendix TDM** includes provisions regarding the timing, scope, and implementation of monitoring and reporting requirements, and requires the Applicant to

adjust the TDM plan based on the monitoring results. The following strategies shall be identified within the TDM plan to reduce the VMT generated by the Proposed Project:

- *Private Shuttle Service* – There are currently no plans for Lake Transit to run buses along Butts Canyon Road near the project site and the nearest bus stops are about six miles away in Middletown. While it is possible Lake Transit might consider adding a stop on Butts Canyon Road in the future to serve project employees, it is our understanding that there is no funding available for it at this time. Alternatively, the project ~~could potentially~~shall provide a frequent direct weekday shuttle service specifically for employees during the peak morning and evening commute periods. This could operate between the project site any and off-site work force housing with a stop at the Lake Transit bus transfer point in Middletown. Please note that shuttles would need be fully accessible to passengers using wheelchairs. It is recommended the applicant also explore providing a real-time smart-phone app that tracks arrivals to make shuttle use more reliable and convenient. Shuttle service for patrons of the project has been assumed as part of this analysis. The current assumption is that regular shuttle service to and from San Francisco and Sacramento will accommodate approximately 40% of resort patrons. The management shall monitor and provide adequate shuttle headways to accommodate all employees and guests who wish to use the shuttle services.

- *On-call Dial-A-Ride Service* – The management shall provide free on-call dial-a-ride transportation service connecting the Guenoc Valley Site to the community of Middletown and to regional transit services. The service shall be made available to the general public within a 15 mile radius of the site, in addition to employees, patrons, and residents of the Proposed Project.

- *Carpool and Ride-Matching Assistance Program* – Although on-site employee parking is limited, the management shall offer personalized ride-matching assistance to pair employees interested in forming commute carpools. As an enhancement, management may consider using specific services such as ZimRide, TwoGo by SAP, Enterprise RideShare, 511.org RideShare or the equivalent.

- *Preferential Parking for Carpoolers/Vanpoolers* – The management shall offer preferential carpool parking for eligible commuters. To be eligible for carpool parking, the carpool shall consist of three or more people. The number of preferential parking spaces will be based on the number of participants in the program. The management shall monitor and provide adequate carpool spaces to meet or exceed potential demand.

- *Dedicated Parking Spaces for Car Share Services* – The management will set aside parking spaces to be dedicated for use by car share services to serve employees. This is expected to reduce parking demand and GHG emissions associated with the project by providing more flexibility for employees who otherwise utilize alternate modes. The availability of car share services within a project can potentially reduce the demand for

employees to own their own cars. Car share services allow for employees to make midday trips without needing to have their own personal vehicle on site. The availability of car share services within a project can potentially reduce the demand for employees to commute by car or even own their own cars. In addition to dedicating parking spaces for car share services for employees, the management may consider dedicating additional parking spaces for car share vehicles dedicated for guest use, if demand exists. The availability of such cars makes traveling to the Project site without a personal vehicle more appealing for some guests The management shall monitor and provide adequate car share spaces to meet or exceed potential demand.

- *On-Site Sales of Transit Passes* – The building management shall offer direct on-site sales of Lake County Transit Authority transit passes purchased and sold at a bulk group rate to employees. Although Lake Transit Authority does not currently operate transit service to the site directly, some employees who live in the greater Lake County and surrounding areas may take public transit to Middletown and then could take the private shuttle to the Project site. Offering on-site transit pass sales reduces the barrier of purchasing transit passes and provides a bulk discount to employees, further encouraging transit use as a primary commute mode.

- *TDM Coordinator* – Management shall designate a "*TDM coordinator*" to coordinate, monitor and publicize TDM activities. The effectiveness of providing a TDM Coordinator on auto mode share is uncertain but is generally seen as a supportive measure that is beneficial to implement the other TDM measures. The Project sponsor may instruct the management company to designate their on-site manager as the TDM coordinator, or they may designate someone else.

- *Transportation and Commute Information Kiosks* - An information board or kiosk will be located in a common gathering area (e.g., lobby, employee entrance, break, or lunch room). The kiosk will contain transportation information, such as Emergency Ride Home (ERH), transit schedules, bike maps, and 511 ride-matching. Information will be updated periodically by the designated TDM Coordinator.

- *Tenant Performance and Lease Language – TDM Requirements* - For all tenants, the applicant will draft lease language or side agreements that require the identification of a designated contact responsible for compliance and implementation of the TDM program.

- *Tenant/Employer Commute Program Training* - As needed and applicable, the applicant or property management will provide individual tenants of the project with initial TDM (and commute) program training, and commute program start-up assistance. The overarching goals of this support function are to reduce commute trips for employees and assist with employee marketing and outreach.

- *Employee Transportation Brochure* - All employees will be provided with an Employee Transportation Brochure regarding the Commute Program. This brochure will include

(but not be limited to) information about shuttle service, carpool parking, transit opportunities, ride-matching services, bicycle routes, and emergency rides home.

VOLUME II, SECTION 3.16 WILDFIRE

Impact 3.16-1

The following changes were made to Impact 3.16-1 in Volume II, Section 3.16-4, page 3.16-9 of the Final EIR:

Guenoc Valley Site Phase 1 and Future Phases

The emergency response and evacuation plans in effect in Lake County are the Emergency Operations Plan and the Community Wildfire Protection Plan. As described above, the Emergency Operations Plan outlines emergency response procedures in effect in the County. The SLCFPD and Cal Fire would provide emergency wildfire response. The Proposed Project includes measures to aid emergency response on the Guenoc Valley Site. These measures are included in **Appendix FIRE**, which is a Wildfire Prevention Plan prepared in collaboration with the County, Cal Fire, design and engineering teams, and grazing consultants. In the event of a wildfire, the on-site emergency response system would utilize early detection high-definition cameras, an emergency notification siren system, an on-site emergency response and fire center, six Designated Meeting and Staging Areas, and emergency helipads. The emergency and fire center would include a structure to house firefighting equipment, as well as a headquarters space and storage for minor medical supplies. The County's emergency response protocols would not change due to development of the Proposed Project. The Lake County Sheriff's Office stated that the Proposed Project would not impact the Emergency Operations Plan (Macedo, 2019b). Furthermore, the Lake County Sheriff's Office 2020 Draft Emergency Operation Plan states that the document will be updated bi-annually to ensure that plan elements are valid and current (LCSO, 2020) and the Community Wildfire Protection Plan states that "Updated emergency response information is a basic component of an effective response strategy. Lake County has the capacity to manage and maintain this information within its Information Technology Department. Local and federal agencies need to ensure that their information is continually updated with the County." Therefore, the Proposed Project's service area will be included in future emergency response/evacuation plans.

Impact 3.16-2

The following changes were made to Impact 3.16-2 in Volume II, Section 3.16-4, pages 3.16-10 through 3.16-14 of the Final EIR:

Guenoc Valley Site Phase 1 and Future Phases

As discussed in Section 3.16.2 and in the Wildfire Prevention Plan (**Appendix FIRE**), the Guenoc Valley Site contains existing wildfire risk factors, including chaparral and grassland vegetation, steep slopes, summers with low precipitation, and moderate wind speeds. Wildfires have affected the Site throughout its history, with the most recent fires including the Butts Fire in 2014 and the Jerusalem and Valley Fires in 2015, the latter of which caused wide-spread damage to the southern portion of the site. As shown in **Figure 3.16-2** and discussed above, the southern and central portions of the site are within a Very High Fire Hazard Severity Zone and the rest of the site is within High and Moderate Fire Hazard Severity Zones. This indicates that Cal Fire has determined that a number of factors, such as terrain and weather, make the Guenoc Valley Site, highly susceptible to fire hazards.

Development of the Guenoc Valley Site would introduce additional wildfire risk factors as compared to existing conditions. The addition of new roads throughout the Site and the corresponding increase in vehicular traffic could increase fire risk through sparks, catalytic converters, and discarding of cigarettes. The introduction of commercial, residential, and recreational uses would increase the number of inhabitants on the Site, thereby increasing the risk of wildfires due to human-caused ignitions such as arson, children playing with fire, and debris-burning (Keeley and Syphard, 2018). The introduction of residences within the site would create a wildland-urban interface – an area where houses are in or near wildland vegetation. The wildland-urban interface is a common location for wildfire ignitions, as the majority of fires are human-caused. Naturally, the addition of new development would also increase the risk of wildfire ignitions as inhabitants populate a previously undeveloped area (Radeloff, et al., 2018). Given the existing wildfire risk factors within the Guenoc Valley Site, development of the Proposed Project would have the potential to exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire. However, the relationship between population growth and fire activity is complex and not always a direct correlation. For example, increased fire education, a decline in smoking, and modern vehicles that notify you when they are overheating, have reduced the impacts of anthropogenic causes of wildfire ignitions in recent times (Keeley and Syphard, 2018). Keeley and Syphard (2018) make the argument that electrical powerlines may pose a more significant risk than other anthropogenic ignitions.

Additionally, wildfires tend to cause more damage to structures built at low to medium densities partly due to the fact that denser neighborhoods usually have less flammable vegetation and can be defended more easily with fewer resources. However, if densely developed homes are not built with the best fire-resistant construction materials and defensible-space requirements, the closer spacing can lead to structure-to-structure ignition. (UC ANR, 2020).

In additional to exacerbating wildfire ignition risks, if a project does not include sufficient roadway capacity to evacuate the project residents, emergency access to the site could impede the ability of emergency responders to respond to and put out a fire. Impeding emergency access could also exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire.However, implementation of project commitments, including the Wildfire Prevention Plan (**Appendix FIRE**), which is a component of the Proposed Project as discussed in Section 2.5.2.3 and Impact 3.16-1, would ensure that features are incorporated into the Proposed Project such that wildfire risks are not exacerbated. In fact, the Wildfire Prevention Plan and the Proposed Project would reduce wildfire risks in the area by adding an additional fire response center, undergrounding existing and proposed electrical power lines, year-round grazing and vegetation removal, fire breaks along project roadways in fire prone areas, an irrigated green belt, and incorporating fire resistant landscaping. Fire breaks, landscaping, and defensible space on both private and community spaces would be managed and enforced by the development's homeowner association to ensure defensible space zones are maintained. These measures within the Wildfire Prevention Plan would minimize the probability that the project would exacerbate the risk of uncontrolled spread of wildfire in relation to the existing conditions within the site, including on-going agricultural and ranching operations. The Wildfire Prevention Plan would be a condition of project approval of the Conditional Use Permit. The Wildfire Prevention Plan and project commitments that would reduce the risk of wildfire ignition and the uncontrolled spread of wildfire within the site include:

- Measures / Features to Reduce Wildfire Ignition Risk Reduction and the Uncontrolled Spread of Wildfire:
    - Fire Breaks. The Proposed Project includes fire breaks to be established and maintained along all roadway corridors as well as vulnerable property boundary edges, as depicted on Figure 2-10 of the Final EIR. Fire prone vegetation will be removed/reduced within fifty feet from both edges of each proposed roadway, including cutting down dead trees and removing all flammable shrubs. The understory below trees will be maintained by mowing, year-round grazing, and manual vegetation removal; in addition, shrubs will be removed below trees. Within this zone, individual trees or tree clusters will be adequately spaced to prevent fires from quickly spreading. These fire breaks would serve to not only slow or stop the spread of wildfire, but would also reduce the risk of wildfire ignition from sparks or discarded cigarettes along project roadways.
    - Defensible Space Around Buildings. Landscaping within 300 feet of proposed commercial buildings and within 50 feet of residential buildings must be native and low fuel vegetation to reduce vegetated fire risk. Compliance with defensible space requirements will be managed by the homeowner association and not left to the discretion of individual property owners, and therefore compliance will be higher than would occur under a typical subdivision development;
    - Undergrounding existing PG&E infrastructure within the site, and proposed electrical and propane infrastructure. As stated in Impact 3.14-8, the Proposed Project would underground approximately 18 miles of existing overhead PG&E

electrical infrastructure lines, removing a current risk of wildfire ignition within the site. Additionally, all proposed electrical infrastructure would be located in underground trenches. Similar to the strategy of undergrounding power lines, gas propane tanks will be undergrounded throughout the resort.

- Fuel Management Strategies. Landscapes will be actively managed to reduce fire risk. Grazing will primarily take place within the site's undeveloped rural landscapes; where feasible and permissible, grazing may also be used to manage landscapes within resort, residential, and facility parcels as well as within vineyards. In areas that are infeasible to graze, flammable vegetation will be manually addressed through mowing, trimming, cutting, and brush removal. Existing ranch roads may be used to access more remote areas for active management practices.

- Fire Resistant Building Strategies:
  - Project construction will adhere to most recent Building Code requirements related to fire resistant materials and hardening. New construction within the Site will be less vulnerable to fire, as the incorporation of modern fire-resistant materials and design based on emerging fire science makes homes more wildfire-resilient (University of California, 2020). Class A rated roofs, fire resistant eaves and overhangs, non-combustible building vents, and fire-resistant deck materials will be incorporated into building design to address wildfire safety, as stated in the Wildfire Prevention Plan and **Table 4.2** of the MMRP.
  - All exterior structures to include sprinklers. Exterior fire suppression systems will be required for all primary structures. These systems will be remote or heat-activated. Exterior fire suppression systems shall be fully autonomous in the event power is cut/shut off, allowing the activation to be fully operational at all times without intervention or activation. During a fire, they will prevent substantial damage to primary buildings as well as nearby outdoor features, and as a result will slow the spread of wildfire within the Site.
  - Fire hydrants distributed throughout the site. As shown on page 31 of the Wildfire Prevention Plan, the Project proposes a network of fire hydrants throughout the development. The combination of fire hydrants and exterior sprinklers distinguishes the Project from the typical sprawl of low-density projects. Unlike those developments, the Proposed Project has a safe, reliable and easily accessible supply of water for fire suppression purposes.
- Early Detection / Response Measures:
  - On-site Emergency Response Center / Fire Station. The Proposed Project involves construction of an on-site emergency response and fire center, which would reduce the response time for emergency vehicles to respond to incidents within the site and surrounding area. All of the proposed lots under Phase 1 would be within a five mile drive radius of the proposed Emergency Response Center. According to the Insurance Services Office (ISO), being within a 5-mile drive distance of a fire station and within 1000-feet of a fire hydrant, is one criterion for reduced fire insurance rates, indicating a lower risk for development to be impacted by a wildfire (Lake LAFCO, 2007).

- Camera on top of Mountain. As part of the project intent to increase early warning systems for the Guenoc Valley and surrounding landscapes, the Project will install at least one high definition fire camera at a high point within the site to be managed by CalFire. These cameras have been installed at various mountain tops within the County and are used to improve the ability of CalFire and fire districts to effectively manage available resources to respond to a fire. Currently there are no cameras installed within the Guenoc Valley Site. The proposed camera will improve early fire detection capabilities in the areas within and surrounding the site.
- 24 / 7 security patrols. The project would include 24-hour security patrol. These patrols would aid in early fire detection and response as they would have access to emergency radios and notification systems and would alert the ERC in the event that a wildfire is detected.

- Evacuation Procedures, Emergency Access and Response:
  - Evacuation Routes and Plan: Creation of a Wildfire Evacuation Plan for the Proposed Project is listed as a Project Commitment in the Mitigation Monitoring and Reporting Plan (see **Final EIR, Volume I, Section 4.0, Table 4-2**). The Wildfire Evacuation Plan will identify and describe the emergency meeting areas, evacuation and emergency egress routes and procedures in the event of a wildfire emergency, and will serve as an educational tool for the project employees, residents and guests. The evacuation plan would allow for orderly evacuation of the site that would not impede emergency responders from travelling and responding to fires, thereby exacerbating wildfire risks.
  - Early Warning Systems:
    - A Fire siren shall be placed within the Project Site that shall work in conjunction with the multiple early warning systems
    - Interior Fire alarm systems shall be connected to the Project security systems
    - Joint trench design will include a hard-wired communication system for all residences
    - Each residence or guest unit will communicate with the security system when occupied for emergency evacuation communication purposes
  - Designated Meeting and Staging Areas: The Proposed Project includes six Designated Meeting and Staging Areas for residents, visitors, and employees to gather for safety and assistance.
  - Roadway construction and adherence to code. Roadway design will adhere to CAL FIRE fire protection standards, as well as local Plans, to ensure emergency access. This would include design requirements such as roadways that can handle the weight of fully loaded fire equipment, roads that are not excessively steep, and roads that are looped or provide double-access to provide escape routes. Adherence to code will also ensure that emergency access can be maintained simultaneously with vehicles evacuating the site.
  - Intersection Improvements. As a requirement of the traffic mitigation measures identified in Section 3.13.5 of the Final EIR, the Proposed Project will implement improvements at State Route 29, which is a major evacuation route in the County,

as well as fund a fair share towards Caltrans intersection improvements. These traffic mitigation measures could possibly decrease response time in a wildfire emergency.

As discussed above the project commitments would minimize the risk of wildfire ignition within the Site and the ability of wildfire to spread uncontrollably through fuel management and fire break techniques. In the event of a wildfire, the early detection features, including mountain top camera and security patrols, would improve the ability of the SLCFPD to respond in a timely manner to a wildfire occurring in the area. Sufficient evacuation and emergency access options have been provided to allow emergency responders to access to the site to put out a wildfire. Furthermore, the Proposed Project has a reliable water supply to combat potential fires. A network of fire hydrants will be located throughout the site and be designed to maintain a minimum of a two-hour flow, and surface water sources can be drawn upon by fire engines or helicopter buckets in the case of a wildfire emergency.

The Proposed Project would not exacerbate the risk of wildfire from existing levels with implementation of the Wildfire Prevention Plan; thus, this impact is **less-than-significant**. Refer to Impact 3.16-3 and 3.61-5 regarding construction-related ignition risks and associated mitigation, and Impact 3.16-5 for a discussion of the potential of the Proposed Project to expose *people or structures* to risk of loss, injury or death involving wildland fires.

Impact 3.16-5

The following changes were made to Impact 3.16-5 in Volume II, Section 3.16-4, pages 3.16-16 through 3.16-20 of the Final EIR:

Guenoc Valley Site Phase 1 and Future Phases

As described above, the Guenoc Valley Site contains Moderate to Very High Fire Hazard Severity Zones as designated by Cal Fire and large portions of the site have burned in historic wildfires. By establishing residential uses and commercial resort uses within this area, the Proposed Project could expose people and structures to a significant risk of loss involving wildland fires. In the event of a wildfire igniting within the Site, the spread of fire and potential to impact adjacent areas would depend on where the fire started and the wind direction at that time. As discussed in Section 3.16.2 and in the Wildfire Prevention Plan, the Guenoc Valley Site is generally at a lower fire risk and rated moderate severity in the southwest portion of the Site where the topography is flatter and the land is more actively cultivated. The Site is generally rated high severity on the north and northeast portions and rated very high severity in the southeast and central parts of the Site where there is a lot of chaparral vegetation, steep slopes, and exposure to high winds. In general, south and southwestern facing slopes would be the most likely to ignite and burn due to their associated solar exposure, humidity, and temperature. Additionally, slopes exceeding 30 percent are at greater risk of quickly burning during a wildfire. For example, planned

development on slopes surrounding the proposed irrigated vineyards near Lower Bohn Lake in the central park of the Site may have a higher potential for fire risk compared to planned development around the golf course greens, which have a lower slope percentage (see Pages 11 and 12 of the Wildfire Prevention Plan).

As described in Section 3.2.4, nearby existing residences include a few residential homes near the southern border of the Site and the Hidden Valley Community one mile north of the Site boundary, which as of 2017 consisted of almost 7,000 residents (U.S. Census Bureau, 2017). However, the majority of the areas surrounding the Guenoc Valley Site are generally pasture lands and open space. These less managed landscapes tend to have less wildfire prevention implemented and could result in more fuel for wildfires and higher risk for the Guenoc Valley Site. Similarly, if a wildfire were to start on the Site, it could potentially spread to neighboring areas and expose people or structures to risks associated with wildland fires. As stated in the discussion for Impact 3.16-2 above, development of the Site would introduce additional wildfire risk factors as compared to existing conditions.

The addition of new roads throughout the Site and the corresponding increase in vehicular traffic could increase fire risk through sparks, catalytic converters, and discarding of cigarettes. The introduction of commercial, residential, and recreational uses would increase the number of inhabitants on the Site, thereby increasing the risk of wildfires due to human-caused ignitions such as arson, children playing with fire, and debris-burning (Keeley and Syphard, 2018). The introduction of residences within the site would create a wildland-urban interface – an area where houses are in or near wildland vegetation. The wildland-urban interface is a common location for wildfire ignitions, as the majority of fires are human-caused. Naturally, the addition of new development would also increase the risk of wildfire ignitions as inhabitants populate a previously undeveloped area (Radeloff, et al., 2018). Given the existing wildfire risk factors within the Guenoc Valley Site, development of the Proposed Project would have the potential to exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire. However, the relationship between population growth and fire activity is complex and not always a direct correlation. For example, increased fire education, a decline in smoking, and modern vehicles that notify you when they are overheating, have reduced the impacts of anthropogenic causes of wildfire ignitions in recent times (Keeley and Syphard, 2018). Keeley and Syphard (2018) make the argument that electrical powerlines may pose a more significant risk than other anthropogenic ignitions.

Additionally, wildfires tend to cause more damage to structures built at low to medium densities partly due to the fact that denser neighborhoods usually have less flammable vegetation and can be defended more easily with fewer resources.

In addition to exacerbating wildfire ignition risks, if a project does not include sufficient roadway capacity to evacuate the project residents, emergency access to the site could impede the ability of emergency responders to respond to and put out a fire. Impeding

emergency access could also exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire.

In addition to operational activities, construction equipment associated with the installation of infrastructure could cause sparks and ignite a wildfire if not equipped with fully functioning spark arresters.

Therefore, considering the high wildfire risk factors within the Guenoc Valley Site, the Proposed Project, including both construction and operational activities, could expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. This is a **potentially significant** impact. As described in **Section 2.5.2.3** and **Impact 3.16-2**, the Wildfire Prevention Plan (**Appendix FIRE**) is incorporated into the Proposed Project and includes extensive fire management techniques to significantly reduce the risk of wildfire ignition, spread, and damage. These techniques include fire breaks, active landscape management, and an irrigated green belt. Typical fire breaks along roads would include a 50-foot fuel reduction zone on each side of the 25-foot primary roads, totaling 125 feet of fire breaks along roads. At final occupancy of each structure, applicable fire breaks along roadways providing access to that structure shall be installed. Further, at the time of the recording of the last final map for each of the five subdivision groups (Bohn Ridge Subdivision, Equestrian Subdivision, Maha Farms Subdivision, Denniston Golf Estates Subdivision, and Trout Flat Subdivision), the full roadway fire break network shall be completed within that subdivision. There would also be 100-foot fire breaks along particularly vulnerable areas along the Guenoc Valley Site boundary (as shown on **Figure 2-10**). Fire breaks would help prevent the spread of wildfire originating from inside the Guenoc Valley Site, as well as from wildfires originating outside the Site. Actively managed landscape areas would include year-round grazing and manual vegetation removal. Cattle, goats, and sheep would rotate throughout the Guenoc Valley Site to reduce overgrown flammable vegetation. Irrigated agricultural operations would interrupt potential wildfire movement throughout the site. Outdoor recreational amenities such as the golf course and equestrian fields would be regularly irrigated and provide an additional fire break. The reservoirs, ponds, and streams within the Guenoc Valley Site also reduce the spread of fires throughout the site (**Appendix FIRE**).

All residential and commercial buildings would have defensible space zones ranging from a radius of 50 to 100 feet depending on surrounding vegetation and slopes. Within these zones, trees and shrubs would generally be vertically and horizontally separated to reduce “ladder fuel” conditions. Landscaping will prioritize fire resistant plants and avoid those with resinous, oily, or waxy leaves. Additionally, all buildings would comply with the California Fire Code and CBC, including the use of fire-resistant building materials and fire suppression systems. All residential structures would be equipped with smoke detectors, exterior fire suppression systems, window security quick-release where applicable, solid wood doors, and non-combustible metal and tempered glass doors and window in compliance with the CBC. Primary residential structures on dead-end roads that exceed 0.25 miles in length will be required to have exterior fire suppression systems as described in **Appendix FIRE.**

The proposed on-site emergency response and fire center includes a fire station, medical supplies, and an emergency helipad. This station would be staffed by SLCFPD.

The Proposed Project also includes six Designated Meeting and Staging Areas for residents, visitors, and employees to gather for safety and assistance. Fire hydrants will be located throughout the site and be designed to maintain a minimum of a two-hour flow. Surface water sources can also be drawn upon by fire engines or helicopter buckets in the case of a wildfire emergency. To mitigate potential wildfire ignitions due to construction activities, **Mitigation Measure 3.16-1** requires that any construction equipment include a spark arrestor in good working order, as well as keep construction areas clear of combustible materials to the extent feasible. Additionally, Project Commitments for the Proposed Project require that all construction personal shall be required to be equipped with a shovel, fire extinguisher, and water in the event that a fire is sparked. Also, educational training programs will be in place for all construction employees on fire prevention and safety (see **Table 4-2** of the MMRP (Final EIR, Volume II, Section 4)).

Mitigation Measure 3.16-2 requires the preparation of a PWERP with post-fire response measures to reduce the risk of loss, injury or death as a result of wildfires. Implementation of the Wildfire Prevention Plan (**Appendix FIRE**), Project Commitments listed in Table 4-2 of the MMRP (Final EIR, Volume II, Section 4), **Mitigation Measure 3.16-1, Mitigation Measure 3.16-2**, and the California Fire Code will reduce the risks from wildfires to **less-than-significant** levels.

Off-Site Workforce Housing

As discussed above, the Middletown Housing Site has less of a risk for wildfires than the Guenoc Valley Site. However, it is still within a Moderate Fire Hazard Severity Zone designated by Cal Fire, so there is a **potentially significant** risk of loss, injury or death involving wildfires from both operations and construction. To mitigate potential wildfire ignitions due to construction activities, **Mitigation Measure 3.16-1** requires that any construction equipment include a spark arrestor in good working order, as well as keep construction areas clear of combustible materials to the extent feasible. **Mitigation Measure 3.16-2** requires the preparation of a PWERP with post-fire response measures including clearing of evacuation routes and post-fire stabilization. The proposed housing would comply with the California Fire Code and CBC and include fire resistant building materials and smoke detectors. Implementation of **Mitigation Measure 3.16-2** and compliance with the California Fire Code, CBC, General Plan, and Community Wildfire Protection Plan, reduces the direct and indirect risks to structures and risk of loss, injury, or death to **less-than-significant** levels.

Impact 3.16-6

The following changes were made to Impact 3.16-6 in Volume II, Section 3.16-4, page 3.16-20 of the Final EIR:

For wildfire impact analysis, the immediate vicinity of the Guenoc Valley Site and Middletown Housing Site is considered the cumulative context because wildfires could spread from the borders of the sites. This entire region contains areas within Moderate, High and Very High Fire Hazard Severity Zones. Planned cumulative projects in the region are described in **Section 4.2.1**. Currently, the buildout of the Hidden Valley Community, the Valley Oaks Community, and the Guenoc Valley Water Rights Modification Project are planned projects in this region. Development of these projects would introduce new people and infrastructure to the area. Increased development could potentially add more opportunities for igniting fires, more fuel, and make emergency response operations more complex. Any project implemented in this area will have to adhere to applicable State and local regulations with respect to fire zone designation. Furthermore, potential future projects will have to individually assess and mitigate potentially significant impacts related to building in the present and future environmental conditions that are conducive to starting and exacerbating wildfires (e.g. steep terrain). The Proposed Project will implement the Wildfire Prevention Plan and **Mitigation Measures 3.16-1** and **3.16-2** in order to reduce its potential for starting and exacerbating wildfires. Furthermore, these measures will ensure a thorough emergency response, safe evacuation routes, and the competent management of direct (e.g. smoke inhalation) and indirect effects associated with a wildfire (e.g. erosion). Additionally, the Proposed Project's service area would eventually be included in future editions of both the Community Wildfire Prevention Plan and the Lake County Sheriff's Office Emergency Operation Plan, which would ensure that the Proposed Project is included in future County emergency response planning. Because of the discussed factors, the Proposed Project in combination with future projects in the region will not create a significant impact. This cumulative impact is **less than significant**.

3.0 RECIRCULATION OF THE EIR IS NOT REQUIRED

Recirculation is only required where "significant new information" is added to an EIR after public notice of the document's availability. New information is "significant" if it reveals: (1) new substantial environmental impacts; (2) a substantial increase in the severity of an impact; (3) feasible project alternatives or mitigation measures that would clearly lessen the environmental impacts, but which the EIR fails to adopt, or; (4) that "the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless." Laurel Heights Improvement Assn. v. Regents of University of California, 6 Cal.4th 1112, 1130 (1993).

Recirculation is expressly not required if new information "merely clarifies," "amplifies" or "makes insignificant modifications" to the information presented in a draft EIR. CEQA Guidelines, § 15088.5(b); California Oak Foundation v. Regents of University of California, 188 Cal.App.4th 227, 267 (2010).

REVISED MITIGATION MEASURES

This Errata adds supplemental and revised feasible mitigations measures relating to biological resources, greenhouse gases, hydrology and flooding, and transportation (vehicles miles traveled). However, none of the supplemental and revised measures trigger recirculation.

Recirculation is required when a new mitigation measure is added to the Final EIR that meets all of the following criteria: (1) it is feasible, (2) it is considerably different from the alternative or mitigation measures already evaluated in the draft EIR, (3) it would clearly lessen the project's significant environmental impacts; and (4) it is not adopted. *Id.* at § 15088.5(a)(3); *South County Citizens for Smart Growth v. County of Nevada*, 164 Cal.Rptr.3d 68, 80, 221 Cal.App.4th 316, 330 (2013).

For revised mitigation measures, recirculation is not required if the revisions simply clarify, amplify or make insignificant modifications. Here, the new mitigation measures do not meet the second or fourth prongs. The revisions simply provide clarification, amplification and insignificant modifications. As such, they do not present a substantial change in the proposed project or alternatives relevant to environmental concerns. And, they are also going to be adopted.

ADDITION OF SECTION 6.12.3 TO GENERAL PLAN POLICY LU 6.12

The Middletown Planning Area is one of the eight designated planning areas in the Lake County General Plan. The Middletown Area Plan includes the "Langtry/Guenoc Special Study Area." The Special Study Area's borders coincide with the Guenoc Valley Site (Project Site). (Final EIR, Volume II, pages 1-5, and 2-3). Future development in the Special Study Area is contemplated to support a mix of agricultural, winery, resort, commercial, and residential uses. (Final EIR, Volume II, pages 1-5, and 2-5).

The Project includes a General Plan amendment to designate the 16,000-acre Guenoc Valley Site as Resort Commercial and rezone it to Guenoc Valley District, pursuant to the Middletown Area Plan Policy 6.3.1b. (Final EIR, Volume II, pages ES-1, ES-22, 1-5). The amendments to the existing General Plan and zoning designations for the Guenoc Valley Site would allow more residential development than currently allowed under applicable land use regulations and envisioned in the Middletown Area Plan. Response to Comments O7-01.

In response to comments regarding the possible inconsistency between the Project and the Lake County General Plan Policy LU 6.12, County Staff recommended adding Section 6.12.3 to the General Plan: "The provisions of LU-6.12.1 and 6.12.2 shall not apply to the Langtry/Guenoc Special Study Area of the Middletown Area Plan." *See* July 21, 2020 Staff Report. (A prior version of Section 6.12.3 omitted the underlined text. *See* June 25, 2020 Staff Report.)

The addition of Section 6.12.3 to the General Plan does not reveal new, significant information. As an initial matter, the EIR identified the need for the Project to obtain a General Plan amendment, among others. And it found that such approval does not conflict with applicable land use policies and is therefore considered less than significant.

> With the County's approval of General Plan Amendment, Zoning ordinance amendments, and amendment to the Middletown Area Plan Special Study Map, the Proposed Project would not conflict with applicable land use policies, as outlined in Appendix GPCT. Therefore, this is considered a **less than significant** impact. (Final EIR, Volume II, page 3.2-29) (emphasis in original).

Therefore, the addition of Section 6.12.3 to the General Plan is not "new" information because it was already known and disclosed in the EIR that the Project would need a General Plan amendment.

Furthermore, the EIR has already evaluated the environmental effects associated with the Project's General Plan and zoning amendments. Response to Comments, O7-01 (explaining that the impacts associated with the increase in allowable development and residential units above what was envisioned in the Middletown Area Plan are evaluated "throughout the EIR."); Final EIR, 1-1 ("The Draft EIR analyzes the effects of the proposed General Plan amendment and rezoning of the Guenoc Valley Site to GVD on a programmatic level.").

Adding Section 6.12.3 to the General Plan does not reveal new, significant information. Recirculation is not required.