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DEVELOPMENT PERMIT FINDINGS:

1. THAT THE PROPOSED LOCATION OF THE PROJECT AND THE CONDITIONS UNDER WHICH IT WOULD BE OPERATED OR MAINTAINED WILL NOT BE DETRIMENTAL TO THE HEALTH, SAFETY, OR WELFARE OF PERSONS RESIDING OR WORKING IN THE NEIGHBORHOOD OR THE GENERAL PUBLIC, AND WILL NOT RESULT IN INEFFICIENT OR WASTEFUL USE OF ENERGY, AND WILL NOT BE MATERIALLY INJURIOUS TO PROPERTIES OR IMPROVEMENTS IN THE VICINITY.

Pursuant to a rezoning and approval of the associated Specific Plan/Master Plan, including a land use designation amendment for a portion of the project site (which covers a total area of 88.8 acres), the location of new and replacement Mt. Hermon Conference Center and organized camp facilities and the conditions under which the Master Plan for these facilities would be operated or maintained will not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood or the general public, and will not result in inefficient or wasteful use of energy, and will not be materially injurious to properties or improvements in the vicinity in that the project is located in an area designated for conference center and organized camp uses and is not encumbered by physical constraints to development that cannot be mitigated through implementation of permit conditions. All mitigation measures recommended in the EIR prepared for this project have been incorporated into the project design or the permit conditions. Construction will comply with prevailing building technology, the Uniform Building Code, and the County Building ordinance to insure the optimum in safety and the conservation of energy and resources.

2. THAT THE PROPOSED LOCATION OF THE PROJECT AND THE CONDITIONS UNDER WHICH IT WOULD BE OPERATED OR MAINTAINED WILL BE CONSISTENT WITH ALL PERTINENT COUNTY ORDINANCES AND THE PURPOSE OF THE ZONE DISTRICT IN WHICH THE SITE IS LOCATED.

The majority of the site, is currently within the "PR" (Parks, Recreation and Open Space) zone district; with other parcels zoned "R-I -15" (Single-family Residential) and "SU" (Special Use) Pursuant to a rezoning to place all MHA owned properties within the "PR" zone district and approval of the associated Specific Plan/Master Plan, which includes an associated land use designation of certain parcels within the project site, all MHA owned parcels with organized camp and conference center uses will be located in the "PR" zone district.

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The accompanying rezoning findings have been made to rezone residential properties within the Specific Plan area (most of which are not owned by MHA from "PR" to the "R-I -15" zoning district so they will have the same zoning as other residential properties within the Mt. Hermon area and to create consistency with the General Plan's "Suburban Residential" designation of these residential properties.

The proposed location of the new and replacement conference and organized camp facilities and the conditions under which the Master Plan will be operated and facilities maintained will be consistent with all pertinent County ordinances and the purpose of the "PR" zone district in that the primary use of the property will be a Christian conference center and associated youth camp. The project approval has also been conditioned to recognize the existing residential uses on those properties currently used for residential purposes consistent with residential uses allowed in the "R-I -15" and "PR" zoning districts.

The project complies with Section 13.10.692 of the County Code regarding regulations for organized camps and conference centers in that the uses are all uses allowed by Subsection 13.10.692(b) and the permit is conditioned to require all uses to meet the development standards specified in subsection 13.10.692(c), except as modified by the Specific Plan.

3. THAT THE PROPOSED USE IS CONSISTENT WITH ALL ELEMENTS OF THE COUNTY GENERAL PLAN AND WITH ANY SPECIFIC PLAN WHICH HAS BEEN ADOPTED FOR THE AREA.

The majority of the conference center and camp facilities are located on 11 parcels which are within the "Parks and Recreation" land use designation. Master Plan facilities will be located on either these 11 parcels or on a 4 acre portion of the 7.5 acre "expansion area". Pursuant to a rezoning and associated land use designation amendment of the 7.5 acre "expansion area", all project facilities will be on parcels designated as "Parks and Recreation" land use by the General Plan. The approval of the Specific Plan/Master Plan includes amending the General Plan to designate *all MHA* owned parcels in the Master Plan area as "Park and Recreation" land use if not currently so designated in order that all camp and conference center properties within the Master Plan area are designated uniformly.

In addition, the approval allows MHA to construct conference related facilities (parking lots) within the 4 acre portion of the "expansion area" in the future if it successful in acquiring these non-MHA owned parcels with the prerequisite that a General Plan amendment must be first approved for these parcels before it can proceed with any camp and conference center related uses. This requirement protects the current residential uses on the non-MHA parcels and allows these properties to continue under residential zoning until such time until they become acquired by MHA for conference center use. The proposed new and replacement conference and camp facilities are all uses that are consistent with all applicable elements of the General Plan as discussed in the following paragraph.

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The approval of the Specific Plan/Master Plan includes the establishment of a Rural Services Line around the perimeter of the project area to recognize that the area has existing services and densities of an urban nature. This area meets the criteria of a Rural Services Line area as defined by both the General Plan and the County Code.

The EIR evaluated in detail the original project's consistency problems with 6 policies of the General Plan. Revisions have occurred in the project or the Planning Commission has made a policy interpretation that policy conflicts do not exist to resolve any conflicts with these 6 policies as follows:

- a. A conflict with General Plan policies 7.9.2 and 7.9.3 is avoided by establishing a Rural Services Line around the project site. The requirements of 7.9.2 and 7.9.3 do not apply within the Rural Services Line.
- b. The project has been redesigned to include an environmentally superior water supply from that which was originally proposed. The implementation of a comprehensive water conservation plan and infrastructure to allow use of surface water from excess spring flows in place of sole reliance on using the Lompico aquifer for water supply will avoid a conflict with policies 7.18b and 7.18.5. The revised project is consistent with the requirement of policy objective 7.18b that new development shall only be permitted if it generates water use that is within the limit of water supplies which are available to serve the project. It also creates conformance with policy 7.18.5 to promote management of the Santa Margarita groundwater basin to protect the long-term security of water supplies and to safeguard groundwater quality.
- c. The Planning Commission has made a policy determination that the restrictions limiting the placement of a privately operated community sewage treatment and disposal systems outside of the Urban Services and Rural Services Lines specified by policy 7.21.5 are not applicable to this project because the project has been revised to establish a Rural Services Line (RSL) for the project area. This project modification requires project consistency with General Plan policy 7.20.1 which addresses community sewage disposal systems inside the RSL. The Planning Commission has determined that the project's privately operated community sewage treatment and disposal system complies with General Plan policy 7.20.1, which permits "new development" within Rural Services Lines to be served by community sewage disposal systems. Even though the system is privately owned and operated, numerous factors and special circumstances assure that the goals of General Plan policy 7.20.1 to assure safe, reliable operation of the system, under appropriate public scrutiny and regulation:
 - i) Historically, the Mt. Hermon community has been served by a community leach field disposal system, as well as numerous individual septic systems. In response to concerns identified by the County's San Lorenzo River Nitrate Management Program, the Regional Water Quality

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Control Board (RWQCB) ordered the Mt. Hermon system upgraded to a waste water treatment facility in 1997, and required numerous of the individual septic systems to be abandoned and connected to it. These improvements were constructed pursuant to an official RWQCB Order, and County Grading and Building Permit approvals, though the system has not been, nor is it now proposed to be, operated by, or under contract to, a public agency.

- ii) The many parcels served by the treatment facility are under common ownership, and so responsibility for operating the facility and resolving any problems which develop is simplified. Enforcement is also less complicated, since both ownership and responsibility for the entire system rest in the same entity, the Mt. Hermon Association.
 - iii) Responsible public agency oversight is assured by RWQCB jurisdiction over the operation of the plant, including the automatic assessment of penalties if violations occur. In addition, the County reviews monitoring reports to ensure compliance with the Nitrate Management Program.
 - iv) Because of its special relationship to the singular community it serves, the management of the plant's operation and maintenance of the plant has proved to be responsible, reliable and safe.
- d. In concert with the findings made regarding policy 7.21.5 above, the Commission has made a policy determination that the restrictions limiting the placement of sanitary sewers outside the Urban Services Line specified by policy 7.21.6 are not applicable to this project because sewers do not begin within an Urban Services Lines area, but rather are located solely on the project site. The sewers are currently in use to convey wastewater to the sewage treatment facility (package treatment plant) constructed in 1997. The installation of new sewers to serve other MHA uses will mitigate environmental impacts of the continued use of individual septic tank systems at MHA facilities not now served by sewers without generating growth inducement. The community sewage treatment and disposal facility has been sized to handle a maximum wastewater flow equal to that generated by all Master Plan project facilities. Once these facilities are connected to the facility by sewer, no additional wastewater can be conveyed into the treatment facility.

The project is consistent with other policies of the General Plan in that the full range of services is available or will become available to the Master Plan area with the approval of the Master Plan permit to serve the approved 805 bed density of the project, including domestic water, sewer service, adequate fire protection and roadway and parking areas for efficient vehicle traffic and circulation. Further, any project impacts that may cause impacts to soils, steep slopes or biotic sensitive areas can mitigate these effects as discussed in detail in the CEQA findings made for this project. The adoption of a Specific Plan for the project site will not affect the Felton Town Plan that has been adopted for an adjacent area because the policies

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of the Felton Town Plan do not pertain to the project site. No other specific plan has been adopted in the area.

4. THAT THE PROPOSED USE WILL NOT OVERLOAD UTILITIES AND WILL NOT GENERATE MORE THAN THE ACCEPTABLE LEVEL OF TRAFFIC ON THE STREETS IN THE VICINITY.

The use will not overload utilities in the vicinity in that electrical and natural gas service is currently provided to the Master Plan area and the project will not cause an increase in utility use that would necessitate the construction of new PG&E facilities. The project will not generate additional traffic at levels that will cause significant impacts at any intersection as determined by the traffic study conducted as part of the EIR prepared for this project. According to the EIR project traffic will not lower the level of service rating at any intersection during the a.m. or p.m. peak hours during the times of greatest visitor use of Redwood Camp and the Mt. Hermon Conference Center (June-August). The project has been revised to balance parking demand and parking facilities in phase 1 of the Master Plan to avoid on-site parking impacts in that phase.

5. THAT THE PROPOSED PROJECT WILL COMPLEMENT AND HARMONIZE WITH THE EXISTING AND PROPOSED LAND USES IN THE VICINITY AND WILL BE COMPATIBLE WITH THE PHYSICAL DESIGN ASPECTS, LAND USE INTENSITIES, AND DWELLING UNIT DENSITIES OF THE NEIGHBORHOOD.

The proposed Specific Plan/Master Plan project will complement and harmonize with the existing and proposed land uses in the vicinity and will be compatible with the physical design aspects, land use intensities, and dwelling unit densities of the neighborhood in that the project will continue to provide conference center and associated youth camp uses within the same area as they now occur and expand this use to a 4 acre area that adjoins the aforementioned uses. (The additional 3.5 acres of the "expansion area" will retain its current land uses, which is vacant open space owned by MHA) within the Master Plan area will be negligibly affected as the new and replacement facilities will be located in those areas of MHA property that are currently developed with conference center and camp facilities or associated abandoned dwellings currently in poor or structurally unsafe condition. Approval of the project will not jeopardize domestic water service provided by MHA to the 450 single-family dwellings in the Mt. Hermon community. In fact, the water supply alternative which has become incorporated into the project, will ensure that these dwellings will be provided with domestic water in an area experiencing groundwater overdraft.

6. THE PROPOSED DEVELOPMENT PROJECT IS CONSISTENT WITH THE DESIGN STANDARDS AND GUIDELINES (SECTIONS 13.11.070 THROUGH 13.11.076), AND ANY OTHER APPLICABLE REQUIREMENTS OF THIS CHAPTER.

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The proposed development is consistent with the Design Standards and Guidelines of the County Code in that the site, architectural and landscape design of the project as proposed and conditioned by the permit comply with the applicable objectives of the County's Design Review Ordinance in the following ways:

- a. New development will maintain the existing conference center and organized youth uses of the project (subsection 13.11.072 (a)).
- b. The site design of new facilities will preserve the maximum amount of forest habitat as possible and the architecture of the new and replacement buildings will be compatible with the rustic architecture of existing buildings (13.11.072(a) and 13.11.073 (b)).
- c. The Master Plan provides for the coordinated development of MHA facilities that share parking and circulation facilities, signage and garbage collection service (13.11.072 (a)).
- d. The existing riparian corridors of Bean and Zayante Creeks and the wetland habitat of the pond adjoining the recreation field are maintained and the long-term quality of the upland evergreen forest habitat is also maintained through site design and implementation of biotic mitigation measures (13.11.072(b)).
- e. Permit conditions require parking lot design to minimize the visibility of paved surfacing and parked vehicles by use of earthen berms and native tree landscaping (13.11.074(c)).
- f. Permit conditions require all project lighting to be located and designed in a manner that does not produce significant glares to any nearby residential uses (13.11.074(d)).
- g. Landscaping shall be based on preserving existing tree whenever possible and using new plant material which are composed of species native to the mixed evergreen/redwood dominated forest habitat (13.10.075(a)).
- h. Development is clustered away from environmentally sensitive areas (13.11.072 (i)).

REZONING FINDINGS:

1. THE PROPOSED ZONE DISTRICT WILL ALLOW A DENSITY OF DEVELOPMENT AND TYPES OF USES WHICH ARE CONSISTENT WITH THE OBJECTIVES AND LAND-USE DESIGNATIONS OF THE ADOPTED GENERAL PLAN.

Pursuant to a adoption of a General Plan amendment, changing the land use designation of certain parcels from "Suburban Residential" to "Existing Parks and Recreation", the rezoning of 3 parcels from the "SU" to the "PR" zoning district, the rezoning of 50 parcels from the "R-I -15" to the "PR" zoning district and the rezoning of 36 residential parcels from the "PR" to the "R-1-15" zoning district will provide the type of uses that are consistent with the General Plan designation of these parcels. The rezoning will allow all conference center and organized camp properties within the 88.8 acre project site to be zoned uniformly with a zone district that is consistent with the objectives of the "Existing Park and Recreation" land use designation. Rezoning to the "R-I -15" zoning district recognizes the residential single-family uses that now occur on those 36 parcels and is consistent with the General Plan's designation for those parcels as "Suburban Residential".

2. THE PROPOSED ZONE DISTRICT IS APPROPRIATE OF THE LEVEL OF UTILITIES AND COMMUNITY SERVICE AVAILABLE TO THE LAND.

The rezoning of the subject 53 parcels to "PR" zoning district will not change the level of utility or community services to these parcels. The properties will continue to be served with electrical, natural gas and telephone service from private utility companies in the same manner as is currently provided to these parcels and other adjoining parcels in the "PR" zone district. Garbage collection will also continue in the same fashion. Water service will continue to be provided by the Mt. Hermon Association. The approval of the associated Master Plan for the Mt. Hermon Conference Center and Camp will restrict the uses and density on these parcels to that which now exists plus those uses to serve an additional 103 visitor bed accommodations. Land uses on the remaining rezoned parcels will remain as they are at present as single-family residential or vacant open space. Therefore the rezoning will not result in a significantly higher density on these particular parcels than could occur under the present "R-I -15" zoning. In summary, the provision of utilities and community services will not be affected by the rezoning.

Likewise, the rezoning of 36 parcels where single-family dwellings exist from "PR" to "R-1-15" will not change the density of these parcels, but will better reflect the residential uses that now exist and are planned for the future on these contiguous

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properties. This zoning in combination with the existing General Plan land use designation of "Surburban Residential" (which will remain) will ensure that none of these parcels is eligible to be considered for a land division should any parcel gain a site area of 30,000 sq. ft. or greater through lot line adjustments. The zoning in combination with the General Plan designation will protect against unplanned residential density increase within this 36 parcel area.

3. a) THE CHARACTER OF DEVELOPMENT IN THE AREA WHERE THE LAND IS LOCATED HAS CHANGED OR IS CHANGING TO SUCH A DEGREE THAT THE PUBLIC INTEREST WILL BE BETTER SERVED BY A DIFFERENT ZONE DISTRICT; OR,
- b) THE PROPOSED REZONING IS NECESSARY TO PROVIDE FOR A COMMUNITY RELATED USE WHICH WAS NOT ANTICIPATED WHEN THE ZONING PLAN WAS ADOPTED; OR,
- c) THE PRESENT ZONING IS THE RESULT OF AN ERROR; OR,
- d) THE PRESENT ZONING IS INCONSISTENT WITH THE DESIGNATION SHOWN ON THE GENERAL PLAN.

Pursuant to the approval of the proposed General Plan amendment, the present "R-1-15" zoning is inconsistent with the new land use designation of "Parks and Recreation" of the 53 subject parcels owned and operated by MHA. A rezoning of the 53 parcels to "PR" will make the zoning consistent with the new land designation.

An additional 36 parcels containing residential uses were rezoned from the obsolete "R" (Recreation) zone district to "PR" in 1983 as part of the County-wide zoning when the "R" zone was abolished. This County-wide rezoning did not recognize that the "PR" zone was not the appropriate zoning for these 36 contiguous parcels at that time. A rezoning to "R-1 -15" will better reflect the single-family residential uses that occur on these 36 parcels. Park and recreation related uses were never anticipated to occur on the 36 residential parcels.

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CEQA Findings for the Mt. Hermon Master Plan

Introduction

The California Environmental Quality Act and County Environmental Review Guidelines require that when an EIR has been completed which for a project identifies one or more significant environmental effects for the project, the public agency shall not approve the project unless one or more of the following findings can be made:

1. Changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen the significant environmental effect as identified to the final EIR.
2. Such changes or alternations are with the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such agency or can and should be adopted.
3. Specific economic, social or other considerations make infeasible the mitigation measures or project alternatives, identified in the final EIR.

The Final Environmental Impact Report for the Mt. Hermon Conference Center and Camp Master Plan project (EIR) includes the Draft and Final EIR dated December 1999 and August 2000 respectively. This EIR also has an Addendum consisting of the three Planning Commission staff reports dated October 11, 2000, December 28, 2000 and February 5, 2001. The EIR has identified, as significant, the impacts described below. Changes have been incorporated into the project or mitigations have been required as permit conditions which reduce all but one of the identified impacts to levels of insignificance. A Statement of Overriding Considerations has been adopted for the one unavoidable adverse impact of this project (Impact 4.9-3). The project has been revised to include a Water Supply Alternative which relies on two components: 1) Implementation of a comprehensive water conservation plan for the entire Mt. Hermon community and 2) Diverting excess surface flows from two springs into the water system as a new water source. Both of these components will reduce use of groundwater and replenish the aquifer. These components are labeled Water Supply Alternatives #4 (in the EIR) and #7 (in the Addendum). Alternative #7 is a modification to Water Supply Alternatives #2 and #6 discussed in the Draft and Final EIR. The combination of Alternatives #4 and #6 was specified as the Environmentally Preferred Alternative in the EIR. Among other

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things the EIR Addendum discusses why the Alternative #7 is a minor modification of Alternative #6 and therefore the combination of Alternatives #4 and #7 are now the Environmentally Preferred Alternative for this project.

Project revisions and/or mitigations are described below each impact listed on the following pages of these findings. All mitigation measures listed on the following pages have been incorporated into the project design or they have been made a condition of the project. No mitigation measures need to be adopted for four of the six Land Use and Planning Compliance impacts (Impacts 4.1-1, 4.1-2, 4.1-5, and 4.1-6) because the Planning Commission had made a policy determination that the General Plan policies addressed in these impacts are not applicable to the project. Planning Commission has determined the project is consistent with General Plan policy and therefore no mitigation is necessary.

CEQA finding #1 pertains to all impacts specified in the third Section below for which mitigation measures or project revisions have been adopted with the exception of Impact 4.6-4. CEQA finding #2 pertains to Impact 4.6-4. Additional findings for these impacts are specified at the end of each topical subsection within the third section below. Finding #3 applies to Impact 4.9-3 as explained in the following two paragraphs.

Significant unavoidable adverse environmental impacts of the project for which the decision maker must issue a "Statement of Overriding Considerations" under Section 15093 of the State CEQA Guidelines (as amended) if the project is approved.

Impact 4.9-3 Loss of historic resources. This impact is addressed in the accompanying Statement of Overriding Considerations

Significant policy conflicts identified in the EIR that have been determined by the decision-makers not to be policy conflicts as a result of General Plan policy determinations

Impact 4.1-1 Conflict with Policy 7.9-2 (Density and Development of Organized Camps and Conference Centers)

Impact 4.1-2 Conflict with Policy 7.9-3 (Seasonal Change and Conference Centers)

Impact 4.1-5 Conflict with General Plan Policy 7.21.5 (Sanitation in Rural Areas-Community Sewage Disposal Systems Outside the Urban and Rural Services Lines)

Impact 4.1-6 Conflict with Policy 7.21.6 (Sanitary Service Connections Outside the Urban and Rural Services Lines)

Finding: General Plan Policies 7.9.2, 7.9.3, 7.21.5 and 7.21.6 do not apply to this project due to the project being modified to include the establishment of a

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Rural Service Line (RSL) encompassing the project area. These policies are not applicable within RSLs. The existing urban density and unique water, wastewater disposal and roadway maintenance characteristics of the project site support establishment of an RSL for the project. Findings supporting these policy determinations are provided in detail in Development Finding #3 for this project.

Significant environmental impacts which can be mitigated and the mitigation measure has been incorporated into the project.

LAND USE COMPATIBILITY/POLICY ANALYSIS

Impact 4.1-3 Conflict with General Plan Policy Objective 7.18b (Water Supply Limitations)

Mitigation Measure 4.1-3 No mitigation available unless the Environmentally Preferred Alternative is adopted.

Impact 4.1-4 Conflict with Policy 7.18.5 (Ground Water Management)

Mitigation Measure 4.1-4 No mitigation available unless the Environmentally Preferred Alternative is adopted.

Finding: The project has been revised to incorporate the Water Supply alternative specified in the EIR's Environmentally Preferred Alternative. This is further explained in paragraph 5 of these findings above.

TRAFFIC AND TRANSPORTATION

Impact 4.2-1 Potential parking shortages during peak events and due to increased lodging.

Mitigation Measure 4.2-1 Provide additional overflow parking area and complete new parking construction prior to operation (occupancy) of new lodging.

Finding: The project had been revised to include an overflow parking area and to include new parking lots in development Phase 1 of the Master Plan.

AIR QUALITY

Impact 4.3-1 Construction of buildings and facilities will result in short-term increases in emissions due to dust generated during site preparation and construction and exhaust from construction vehicles. This is considered a potentially significant impact.

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Mitigation Measure 4.3-I Implement Construction Practices for Short-Term Air Quality Impacts.

Finding: The mitigation measure above has been included in the permit conditions for this project.

NOISE

Impact 4.4-I Noise from Construction of Phase I: Main Conference Center

Mitigation Measure 4.4-1 To reduce construction generated noise to insignificant levels beyond MHA properties, MHA should implement the following measures to mitigate construction noise throughout the entire construction phase:

1. Construct temporary plywood construction noise barriers around the perimeter of the construction sites;
2. Limit construction activity to daytime hours (7:00 am to 5:00 pm) on weekdays
3. Use best available noise suppression devices and properly maintain and muffle diesel engine-driven construction equipment;
4. Locate stationary equipment as far away as possible from sensitive receptors;
5. Designate a Disturbance Coordinator and post the name and phone number of this person conspicuously at the perimeter of the Conference Center. The Coordinator will contact noise sensitive receptors and advise residents of the schedule of construction.

Impact 4.4-2 Noise from Construction of Phase I: Redwood Camp

Mitigation Measure 4.4-2 The same mitigation measures described above for Impact 4.4-I should be implemented to mitigate for the noise created by construction of the proposed Redwood Camp improvements.

Impact 4.4-3 Noise from Construction of Phase II: Main Conference Center
 Construction-related noise levels may intermittently exceed significance thresholds even after implementation of the mitigation measures described below

Mitigation Measure 4.4-3a Implement the construction noise mitigation measures as are recommended for Phase I construction (Mitigation 4.4-I).

Mitigation Measure 4.4-3b Complete construction of all Main Conference Center facilities within one year. Such facilities include the Village Center, Azalea Lounge and Parkway and Conference Center parking lots. If completion is not possible within one year, construction causing significant noise levels should be halted for at least one year before continuing.

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Impact 4.4-4 Noise from Construction of Phase II: Lodges

Mitigation Measure 4.4-4a Implement construction noise mitigation measures as are recommended for Phase I construction (Impact 4.4-1).

Mitigation Measure 4.4-4b Complete construction of all Phase II Lodging facilities within one year. Such facilities include Lakeside Lodge, New Toyon, Heather and Black Cabins, and Forest Lodge (including Forest Lodge parking lot). If completion is not possible within one year, construction causing significant noise levels should be halted for at least one year before continuing.

Impact 4.4-5 Noise from Operation of Phase II: Parking Lots

Mitigation Measure 4.4-5 To reduce parking lot noise to insignificant levels beyond MHA properties, MHA should construct a solid 6-foot high wood fence along the western edge of the proposed Forest Road parking area where the parking area is contiguous to the adjacent private parcels.

Impact 4.4-6 Noise from Construction of the Proposed Well

Mitigation Measure 4.4-6 To reduce well construction noise to insignificant levels beyond MHA properties, MHA should implement the following mitigations during all well drilling operations at this site:

1. Only drill during the daytime (7:00 AM to 7:00 PM).
2. Locate the drilling site behind the existing tank so that the tank can shield drilling noise.
3. Park another truck or erect a temporary barrier around the drill rig.

Finding: The project had been revised to separate the periods of construction activities in the central area of the conference center by placing construction activities at the recreation field and enlargement of the main parking lot in Phase I, timing the construction of the new Black cabin in Phase 2 and scheduling the construction of the new Heather and Toyon cabins and the Village Center to Phase 3 to provide a balance between compressing noise generating activities together and providing intervening periods when no construction related noise will occur near the residential area. Other mitigation measures specified above have been incorporated into the permit conditions for this project.

SERVICES AND UTILITIES

Impact 4.5-1 Release of Untreated Wastewater from Piping or Pump Stations

Mitigation Measure 4.5-1 To prevent wastewater accidents, MHA shall hire a qualified engineer to review pump sizing, pipe sizing and capacity for future

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flow rates and replace pumps when necessary

Finding: The mitigation measure specified above has been incorporated into the permit conditions for this project.

GEOLOGY AND SOILS

Impact 4.6-1 Proposed project developments will expose people and property to potential hazards from the ground shaking and/or surface fault rupture

Mitigation Measure 4.6-1 Conduct geotechnical investigations and develop seismic design requirements for proposed developments.

Impact 4.6-2 Liquefaction and lateral spreading may damage structures during a seismic event

Mitigation Measure 4.6-2 Conduct geotechnical investigations and design modifications to reduce risk of liquefaction and lateral spreading.

Impact 4.6-3 Potential risk of differential settlement may damage buildings during a seismic event or other events when soil instability occurs

Mitigation Measure 4.6-3 Conduct geotechnical investigations for differential settlement and modify designs accordingly.

Impact 4.6-5 Risk of potential landslide hazards may affect new project facilities

Mitigation Measure 4.6-5 Geotechnical engineer shall complete a design-level report on landslides within areas to be graded or within 20 feet of proposed roadways and building pads that provides design and construction recommendations for landslide remediation.

Impact 4.6-6 Unstable cut and fill slopes from grading for new parking lots

Mitigation Measure 4.6-6 Geotechnical engineer shall identify appropriate slope stabilization methods at cut and fill locations.

Impact 4.6-7 Risk of erosion and sedimentation of streams during the construction of new facilities

Mitigation Measure 4.6-7 Minimize and control erosion through the implementation of a County approved erosion control/drainage plan at each project site during and after construction.

Finding: The mitigation measures specified above have been incorporated into the permit conditions for this project.

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HYDROLOGY AND WATER QUALITY

Impact 4.7-1 Groundwater overdraft in the Pasatiempo subunit of the Lompico aquifer from the significant increase in demand for domestic water use.

Mitigation Measure 4.7-1 Implement alternative water supply #4 and #7.

Impact 4.7-3 Potential contamination of groundwater in Santa Margarita or Lompico aquifers caused by project construction or operation

Mitigation Measure 4.7-3 Prevent storage or discharge of hazardous or contaminating materials such as fuels, chemicals, or pesticides.

Impact 4.7-4 During construction activities, grading, construction and concentrated discharge of collected runoff could result in erosion, increased sedimentation, and contaminant loading

Mitigation Measure 4.7-4 Prepare Drainage and Erosion Control Plans prior to issuance of Building and Grading Permits for each facility and implement approved plans.

Impact 4.7-5 Increased runoff from impervious surfaces, resulting in local drainage problems or flows exceeding drain capacity.

Mitigation Measure 4.7-5 Prepare and implement stormwater drainage plans for each building envelope.

Impact 4.7-6 Concentrated discharge of increased runoff could result in erosion and increased sedimentation of area streams

Mitigation Measure 4.7-6 Implement adequate energy dissipation at drainage outflows as recommended in Storm Water Drainage Plan.

Impact 4.7-7 Flooding of Main Conference Center parking lot during high rainfall events.

Mitigation Measure 4.7-7 Provide an engineered storm drainage design for parking lot and include design in grading and drainage plans for lot reconstruction.

Impact 4.7-8 Potential long-term contamination of streams and surface water from urban runoff from increased impervious surfaces

Mitigation Measure 4.7-8 Prevent water quality degradation of area streams during the operation of conference center facilities by installation of silt and grease traps to filter parking lot runoff before it leaves parking areas and implement other runoff filtration measures as appropriate.

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Finding: The project has been revised to implement Water Supply Alternatives #4 and #7 instead of relying on water from a new conventional well as originally proposed. Existing MHA wells #1 and #2 will continue to be used but their production will be reduced as a result of reducing water use as described in Alternative #4 and implementing a new supplemental water source described in Alternative #7. The third well allowed by Alternative #7 will be used only as a backup well when either well #1 or #2 are shut down for repairs or other purposes and as a pilot well to test aquifer injection. Using the third well in this limited manner avoids Impact 4.7-I. Other mitigation measures specified above have been incorporated into the permit conditions for the project.

BIOTIC RESOURCES

Impact 4.8-1 Direct impacts to wetland and riparian habitats adjacent to the recreation fields and loss of pond habitat by converting the natural pond to an improved pool

Mitigation Measure 4.8-1 Modify plans to maintain the natural wetland/riparian feature in its natural state.

Impact 4.8-2 Indirect impacts from construction activities within Redwood Camp, recreation field, and miniature golf course to riparian woodland of Zayante Creek and increased erosion and sedimentation in creek and associated riparian corridor

Mitigation Measure 4.8-2 Implement erosion control plan and exclusionary fencing plan measures at each building site during construction.

Impact 4.8-3 Indirect impacts to herbaceous wetlands and freshwater marsh from construction activities for recreation field, pond, Conference Center parking lot and pavilion amphitheater

Mitigation Measure 4.8-3 Protect wetland habitats from construction disturbance with exclusionary fencing.

Impact 4.8-4 Direct and indirect impacts to native forest trees from removal of trees to construct facilities

Mitigation Measure 4.8-4 Implement measures to retain or compensate for loss of native trees.

Impact 4.8-5 Indirect impacts from construction activities for Lakeside Lodge, Main Conference Center parking lot and the Parkway parking lot to adjacent riparian woodland.

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Mitigation Measure 4.8-5 Implement erosion control protective fencing and buffer measures to protect riparian woodland during building construction and grading at each new facility site.

Impact 4.8-6 Indirect impacts to herbaceous wetlands and freshwater marsh from construction activities at the Lakeside Lodge site

Mitigation Measure 4.8-6 Implement measures to protect wetlands from construction disturbance at Lakeside Lodge.

Impact 4.8-7 Direct and indirect impacts to native forest woodland and native trees from fragmentation of habitat and associated reduced species viability resulting from increased potential for non-native species invasion, increased human access, and reduced potential for regeneration

Mitigation Measure 4.8-7 Implement tree protection and tree loss compensation measures prior to and during Phase II construction.

Impact 4.8-8 Development may affect a wildlife movement corridor through the Bean and Zayante Creek stream corridors

Mitigation Measure 4.8-8 Create dedicated conservation area and management plan for riparian corridors.

Impact 4.8-9 Reduction of surface and subsurface water flow from the increase in impervious surface area and reduced seepage and recharge and construction of Phase I may decrease water within the instream habitat of adjacent riparian corridors and tributaries

Mitigation Measure 4.8-9 Implement preferred water supply alternative and associated surface water hydrology and water quality mitigations.

Impact 4.8-10 Development of the footpath around the recreation field and nearby reflecting pool may affect the California red-legged frog habitat and other wildlife

Mitigation Measure 4.8-10 Modify project designs for recreational facilities to reduce impacts to wildlife by redesigning jogging path to follow previously disturbed areas, directing illumination away red-legged frog habitat, redesigning reflecting pool to retain or expand existing pond for use by native wildlife, establish a building buffer around pond in which night lighting is prohibited. If project designs are not modified, replacement in-kind with freshwater marsh, herbaceous wetland and riparian habitat at a ratio of 3 to 1 is required. U.S. Fish and Wildlife Service consultation is required to determine if red-legged frog survey protocol is required.

Impact 4.8-11 Development of certain project facilities may affect special-status

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Mitigation Measure 4.8-17 Implement water quality protection measures specified by Mitigation Measures 4.7-5, 4.7-6, and 4.7-8.

Impact 4.8-18 Potential adverse impacts to steelhead due to reduced unconfined aquifer recharge and spring discharge

Mitigation Measure 4.8-18 Implement Hydrology and Water Quality mitigation measure 4.7-5 to increase in filtration and decrease response time.

Finding: The project has been revised to retain the pond as a natural feature to avoid impact 4.8-1. The revision of the project to include Water Supply Alternatives #4 and #7 will assist in mitigating impact 4.8-9. The other mitigation measures specified above have been incorporated into the permit conditions for this project. Mitigation measures 4.8-4, 4.8-7, 4.8-8, 4.8-10, 4.8-11, 4.8-12, 4.8-13a, 4.8-13b, 4.8-14, 4.8-15, and 4.8-16 shall be addressed in a comprehensive biotic mitigation plan which MHA must submit to County Planning for review and approval prior to issuance of any construction permits for the project.

CULTURAL RESOURCES

Impact 4.9-1 Construction activities may disturbance buried historic and prehistoric resources

Mitigation Measure 4.9-1 Include permitting language regarding a temporary halt of construction if buried prehistoric resources are discovered and comply with the provisions of Section 16.42.100 of the County Code.

Impact 4.9-2 Potential impacts to potentially significant historic cultural resources

Mitigation Measure 4.9-2 Conduct further historic research to avoid potential impacts to historic resources.

Finding: The mitigation measures specified above have been incorporated into the permit conditions for this project.

ENERGY AND NATURAL RESOURCES

Impact 4.1 O-1 Residents of newly constructed facilities that are adjacent to eight parcels designated as "Timber Resource" may be impacted if timber production is initiated

Mitigation Measure 4.1 O-1 Record a Declaration of Acknowledgment prior to any development or expanded use of an adjoining property that is designated for timber production.

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Impact 4.1 O-2 Use of large amounts of water, or wasteful water use

Mitigation Measure 4.1 O-2 Implement the water conservation plan of the Environmentally Preferred Alternative.

Impact 4.1 O-3 Depletion of Groundwater Resource

Mitigation Measure 4.1 O-3 Implement Environmentally Preferred Alternative.

Finding: The project has been revised to implement the EIR's water supply alternatives #4 and #7 rather than relying on the construction of a new conventional well for water as originally proposed. Alternative #4 will avoid impact 4.1 O-2 and alternative #7 will avoid impact 4.10-3. The permit conditions include mitigation measure 4.1 O-1 to address the corresponding impact.

Significant Environmental Impacts and the Mitigation Measure is the Responsibility of Another Agency

Impact 4.6-4 Seismically-induced failure of the dam retaining Loch Lomond Reservoir poses a potential hazard to the project site

Mitigation Measure 4.6-4 Continued maintenance and regulation of Loch Lomond Reservoir by the City of Santa Cruz Division of Safety of Dams (DSOD) according to DSOD standards.

Finding: This mitigation is the responsibility of the City of Santa Cruz.

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nesting **raptor** species and other special-status nesting bird species

Mitigation Measure 4.8-I 1 Implement measures to protect nesting **raptor** and nesting birds, including conducting nest surveys during **raptor** nesting and fledging periods at each construction site prior to construction. Postpone construction if nests are found.

Impact 4.8-I 2 impacts to San Francisco dusky-footed **woodrat**

Mitigation Measure 4.8-I 2 Survey and relocate **woodrats** and middens prior to construction.

Impact 4.8-I 3a Potential impacts to special-status insect species from Phase I construction in mixed evergreen forest habitat

Mitigation Measure 4.8-I 3a Survey for special-status insects and implement protective measures if needed during and after construction.

Impact 4.8-I 3b Indirect impact of increased human disturbance to Zayante sandhills habitat supporting special insect species by increased visitor presence on hiking trail to Ponderosa Lodge and the Cross

Mitigation Measure 4.8-I 3b Install designated trails, protective fencing and **signage** to designate a single trail. Eradication of Portuguese broom in vicinity of Ponderosa Lodge and Cross to enhance habitat.

Impact 4.8-I 4 Impacts to bat species and bat roosting habitats

Mitigation Measure 4.8-14 Preserve or replace bat roosts and roosting trees if any are removed to construct facilities as part of each construction project.

Impact 4.8-I 5 Removal or existing structures for development or Forest Lodge, Forest Lodge parking lot, and other lodging areas may affect bat species and roosting sites

Mitigation Measure 4.8-I 5 Implement bat habitat management roost protection and replacement measures as part of each construction project.

Impact 4.8-16 Phase II facilities may impact special-status birds, **woodrats** and invertebrate species

Mitigation Measure 4.8-16 Implement habitat and species protection measures as described in Mitigations 4.8-I 1, 4.8-12, and 4.8-13.

Impact 4.8-I 7 Indirect impacts to fisheries from impaired water quality caused by construction activities, increased impervious surface area and parking lot operation

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STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE LOSS OF HISTORIC RESOURCES

Introduction

The California Environmental Quality Act (CEQA) requires decision-makers to balance the benefits of a proposed project against its unavoidable adverse impacts on the environment in determining whether to approve a project. Pursuant to Section 15093 of the CEQA Guidelines, the County of Santa Cruz has approved the Mt. Hermon Conference Center and Camp Master Plan proposed by the Mt. Hermon Association (MHA) as specified herein and for the specific reasons for doing so in light of the project generating the following unavoidable adverse impact:

- ~ Permanent loss of the following three historic structures:
 - Auditorium (constructed in 1931)
 - Forest Hall (constructed in 1921)
 - Newton Memorial Building (constructed in 1931)

Detailed Description of the Impact

This impact is identified in the EIR prepared for this project. The loss of these three structures will occur as a result of implementing a new Master Plan to guide future development of the Mt. Hermon Conference Center and Redwood Camp. The Master Plan includes replacing the three historic structures listed above with new replacement buildings to meet the current and future needs of MHA's conference center and camp.

The existing 6,560 square foot auditorium will be replaced by a 23,210 sq. ft. (11,540 sq. ft. footprint) auditorium. Forest Hall will be replaced by one of the two Village Center buildings, which will have a 3,325 sq. ft. footprint. The 2,082 sq. ft. Newton Memorial building has already been replaced by the new 9,236 sq. ft. Ministry Center.

Factors Which Make the Impact Acceptable

While it is acknowledged that these buildings have been designated as historic structures, the condition of the three structures makes them less of a resource than many other designated historic structures. The auditorium's original architecture has been substantially altered on two occasions. It was enlarged in 1934 and extensively remodeled in 1951. Forest Hall has experienced structural deterioration over the years to the extent that this building is not regularly used by MHA or its visitors. The Newton Memorial Building also experienced deterioration to the extent that the building was structurally unsound. The removal of this building was reviewed by the County's Historical Resources Commission in 1997 and that body

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STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE LOSS OF HISTORIC RESOURCES - Page 2

approved the removal of the building to construct the new Ministry Center. The construction of these three buildings in the same location as the existing buildings will allow for most new and replacement facilities to be located within the existing campus of the conference center and camp without removing more open space to construct the new facilities in other locations in Mt. Hermon.

The Master Plan Permit has been conditioned to require County Historic Resources Commission review of the reconstruction of Forest Hall (Village Center) when plans for the new construction are prepared in the future. This condition has been included in the permit at the recommendation of the Historic Resources Commission at their review of this aspect of the project.

The purpose of the replacement buildings is to provide better facilities to enhance the Christian conference and youth camp activities at the site. The camp and conference center provide important spiritual activities that are valued by many members of the public living both within and outside of the Santa Cruz County. These benefits outweigh the unavoidable adverse impact will occur from the project.