DEPARTMENT OF THE ARMY
UNITED STATES ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, US ARMY GARRISON, PRESIDIO OF MONTEREY
1759 LEWIS ROAD, SUITE 210
MONTEREY, CA 93944-3223

Office of the Garrison Commander

Dear Interested Parties:

The United States Army Garrison (USAG) Presidio of Monterey invites all interested parties to review and comment on the Draft Environmental Assessment (EA) and Draft Finding of No Significant Impact (FNSI) for the Demolition of Buildings and Construction of a Parking Area in Monterey, CA.

The Draft EA evaluates potential environmental effects from demolishing four existing buildings located in the secured area of the installation and constructing a parking area with Low Impact Development (LID) features. The Proposed Action would demolish buildings 279, 281, 282, and 283, realign Stilwell Road, and construct a parking area entirely within the constraints of the installation boundaries. Following the building demolitions, the existing parking lot would be expanded and upgraded. The parking area design would include LID features, such as bioswales and permeable pavement, to reduce storm water runoff. Additionally, the parking area would be compliant with current Anti-Terrorism/Force Protection policies, and the Americans with Disabilities Act.

The Draft EA was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190, 42 U.S. Code 4321 et. seq.) the Council on Environmental Quality regulations for implementing NEPA (40 Code of Federal Regulations (CFR), Parts 1500-1508), and Environmental Analysis of Army Actions (32 CFR 651 March 2002). The Draft EA evaluates potential environmental impacts of the Proposed Action and Alternatives and identifies measures to minimize or avoid impacts. Identified mitigations would lower environmental impacts to below significant and would be implemented and monitored.

Draft EA/Draft FNSI comments are due no later than 5:00 p.m. on August 22, 2020.

An electronic version of the Draft EA/Draft FNSI is available on the USAG Presidio website at: https://home.army.mil/monterey/index.php/about/garrison-directorates/public-works/public-notice-environmental-assessment-and-impact

A hard copy of the Draft EA/ Draft FNSI is available upon request at SPK-pao@USACE.Army.mil.

Please forward written comments to:

ATTN: Planning Division
U.S. Army Corps of Engineers, Sacramento District,
1325 J Street
Sacramento, CA 95814

Via electronic mail to SPK-pao@USACE.Army.mil

Via facsimile to: 831-242-7019

Sincerely,

Digitally signed by CHHOEUNG.VARMAN.SOK.1050078961
Date: 2020.07.17 09:18:40 -07'00'

Varman S. Chhoeung
Colonel, US Army
Garrison Commander

DRAFT ENVIRONMENTAL ASSESSMENT AND DRAFT FINDING OF NO SIGNIFICANT IMPACT

Demolition of Buildings and Construction of Parking Area

JULY 2020

PRESIDIO OF MONTEREY
U.S. Army Garrison, Presidio of Monterey

Prepared by:
U.S. Army Corps of Engineers
Sacramento District

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DRAFT
ENVIRONMENTAL ASSESSMENT
OF THE
DEMOLITION OF BUILDINGS
AND
CONSTRUCTION OF PARKING AREA,
MONTEREY CA

UNITED STATES ARMY GARRISON
PRESIDIO OF MONTEREY

JULY 2020

DRAFT

ENVIRONMENTAL ASSESSMENT DEMOLITION OF BUILDINGS AND CONSTRUCTION OF PARKING AREA

Reviewed by:

_____ Date:_____
Joelle L. Lobo
NEPA Program Manager
Presidio of Monterey

_____ Date:_____
Tania Leisten
Chief, Environmental Division
Presidio of Monterey

_____ Date:_____
Jack P. Poling
Director, Directorate of Public Works
Presidio of Monterey

Approved by:

_____ Date:_____
VARMAN S. CHHOEUNG
COL, SF
Commanding

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Draft Finding of No Significant Impact

This Finding of No Significant Impact (FNSI) has been prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, Public Law 91-190, 42 U.S. Code §4321 et seq.; the Council on Environmental Quality regulations for implementing NEPA, 40 *Code of Federal Regulations* (CFR), Parts 1500-1508; and Environmental Analysis of Army Actions, 32 CFR 651 and Army Regulation 200-2. The FNSI is the decision document for the attached Draft Environmental Assessment (EA) for the Demolition of Buildings and Construction of a Parking Lot at the Presidio of Monterey, Monterey, California (Presidio, 2020). The FNSI is based in part on mitigation measures identified to reduce the level of resource impact to below significant that the Presidio is committed to implementing and monitoring.

Description of the Proposed Action and Alternatives

The Proposed Action (Alternative 1) would demolish buildings 279, 281, 282, and 283, realign Stilwell Road, and construct a parking area entirely within the constraints of the installation boundaries. Following the demolition of the buildings, the existing parking area would be expanded and upgraded. This parking lot would include Low Impact Development (LID) features such as bioswales and permeable pavement to reduce stormwater runoff. Additionally, this lot would be compliant with current Anti-Terrorism/Force Protection (AT/FP) policies, and the Americans with Disabilities Act (ADA).

Under Alternative 2- Construction of a Conventional Parking Lot, a standard parking lot would be built in lieu of a parking area with LID features.

Under Alternative 3- No Action Alternative, the buildings would not be demolished and the existing parking area would not be expanded and upgraded.

Summary of Environmental Consequences

Based on the analysis in this Draft EA, the Proposed Action would result in no impacts or negligible impacts to agricultural resources, environmental justice, land use, population and housing, recreation, socioeconomics, and traffic & transportation. Potential impacts to aesthetics, geology & soils, greenhouse gasses, and utilities and service systems would be less than significant. Potential impacts to biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, and noise would be reduced through incorporation of avoidance, minimization, and/or mitigation measures to achieve compliance with existing regulations.

The following impacts would require mitigation: air quality (during demolition), cultural resources, hazardous materials (during demolition), hydrology & water quality (during construction), and noise (during construction). All of these impacts would be mitigated to

less than significant upon implementation of required mitigation measures (AQ-1, CR-1 through CR-4, HM-1 through HM-6, HW-2, and NM-1).

The Proposed Action would result in beneficial effects related to aesthetics (bioswales), hydrology and water quality (reduction in stormwater runoff and increased infiltration), traffic & transportation (road realignment), and utilities and service systems (reduction in load on existing stormwater systems).

Public Review and Comment

A Notice of Availability of this Draft EA/Draft FNSI (Appendix A) was published on July 23, 2020 in the Monterey County Weekly notifying the public of the availability of the Draft EA/Draft FNSI and initiating the 30-day public comment period.

An electronic version of the Draft EA/Draft FNSI is available on the USAG POM website at: https://home.army.mil/monterey/index.php/about/garrison-directorates/public-works/public-notice-environmental-assessment-and-impact

A hard copy of the Draft EA/Draft FNSI is available upon request at SPK-pao@USACE.Army.mil.

In accordance with the Intergovernmental Cooperation Act of 1968 (42 U.S.C. 4231(a)) and the Intergovernmental Review of Federal Programs (Executive Order (EO) 12372), which require federal agencies to cooperate with and consider federal, state, and local interests in implementing a proposal, USAG Presidio of Monterey has provided notice of the Draft EA/Draft FNSI to agencies and organizations. A list of individuals and organizations that have been mailed notices about the availability of the Draft EA/Draft FNSI and how to comment is provided in Appendix A.

The public can send comments to:

ATTN: Planning Division
U.S. Army Corps of Engineers, Sacramento District,
1325 J Street, Sacramento, CA 95804

or via electronic mail to

SPK-pao@USACE.Army.mil

Conclusion

Based on the environmental analysis contained in the Draft EA, it has been determined that carrying out the Proposed Action, with implementation of the identified mitigation measures, would have no significant direct, indirect, or cumulative impacts on the human environment, including the physical and natural environment and the relationship of people with those environments. Because no significant impacts would result from implementing the Proposed Action, preparation of an environmental impact statement is not required and will not be prepared.

Approved by

_____ _____

VARMAN S. CHHOEUNG **Date**
COL, SF
Commanding

Executive Summary

The United States Army Garrison (USAG) Presidio of Monterey (Presidio) has prepared this Draft Environmental Assessment (EA) to evaluate the potential environmental effects of a proposed parking lot expansion, road realignment, and improvement on the northwest end of the installation. The Proposed Action is needed to provide sufficient parking for installation personnel, reduce stormwater runoff from the existing structure, and provide parking access for personnel with disabilities. This Draft EA was developed in accordance with National Environmental Policy Act (NEPA) of 1969; implementing regulations issued by the President's Council on Environmental Quality (CEQ), 40 CFR Parts 1500-1508; and Environmental Analysis of Army Actions, 32 CFR Part 651 and Army Regulation (AR) 200-2. The Draft EA identifies mitigation measures to reduce the level of resource impact to below significant that the Presidio is committed to implementing and monitoring.

ES.1 PROPOSED ACTION

The Proposed Action (Alternative 1) would demolish four buildings 279, 281, 282, and 283 in the Historic District, realign Stilwell Road and construct a parking lot with Low Impact Development features within the installation boundary.

ES. 2 PURPOSE AND NEED FOR THE PROPOSED ACTION

The purpose of the proposed action is to provide adequate, handicap accessible parking within the constraints of the installation boundaries and improve traffic circulation at Presidio of Monterey in a manner which is consistent with long range planning objectives. The proposed action is needed because of lack of sufficient parking and unauthorized parking occurring around buildings 279, 281, 282, and 283 and to meet current antiterrorism force protection standards that mandate parking areas be planned and relocated on the perimeter of the military installations. Use of the unlit and unpaved portions of the unauthorized lots creates unsafe conditions for drivers and pedestrians due to lack of directional pavement markings and signage. Additionally, the unauthorized lot is not handicap accessible. The poor condition of the pavement accelerates wind and water erosion of the underlying soil resulting in runoff which has unnecessary adverse impacts on surface water quality. Further, parking spaces and drive isles are not clearly marked or optimized which results in an inefficient use of space. Base wide, more than 400 spaces are needed. Parking deficiencies are due to inability to meet the prescribed number of spaces per building occupancy. Current deficiencies plus potential for future increase in students and support staff would exacerbate the parking situation.

ES. 3 ALTERNATIVES CONSIDERED

32 CFR Section 651.34 requires consideration of the Proposed Action, a No Action Alternative, and "all other appropriate and reasonable alternatives that can be realistically accomplished." As described below, this Draft EA analyzes the Proposed

Action, Construction of a Conventional Parking Lot (Alternative 2), and a No Action Alternative (Alternative 3). The alternatives analyzed herein are the alternatives selected by the Presidio as the most feasible which satisfy the purpose and need of the project.

The Presidio considered alternative locations for parking, however, due to the cost of land off installation and AT/FP requirements, these alternatives were precluded from further analysis. The Presidio additionally considered the construction of a parking structure, however, this also did not meet AT/FP requirements for this location and may disrupt the character of the historic district.

The two alternatives that are considered in this Draft EA are summarized below and described more fully in Section 2.

Under Alternative 2 – Construction of a Conventional Parking Lot, buildings 279, 281, 282, and 283 would be demolished, Stilwell road would be realigned, and a typical asphalt lot with a connection to the existing stormwater system would be built.

Under Alternative 3 – No Action Alternative, the existing parking lot and buildings 279, 281, 282, and 283 would remain as is, and would not be upgraded with LID features or expanded.

ES.4 SUMMARY OF ENVIRONMENTAL CONSEQUENCES

All potentially relevant resource areas were initially considered for analysis in this Draft EA. In compliance with NEPA and CEQ guidelines, the discussion of the affected environment and the environmental consequences focuses only on those resource areas considered potentially subject to impacts and with potentially significant environmental issues. The Presidio concluded that the Proposed Action would result in no impacts or negligible impacts to the following resource areas: agricultural resources, environmental justice, land use and planning, mineral resources, population and housing, public services and schools, recreation, socioeconomics, and traffic and transportation. Therefore, these resource areas were not carried forward for detailed description and analysis.

The Presidio is finalizing a Memorandum of Agreement (MOA) with the California State Historic Preservation Officer (SHPO) for the demolition of the building and construction of parking area in the Presidio Historic District. The Army and the SHPO concur that the Proposed Action would not adversely impact the Historic District and all buildings would be appropriately recorded through mitigations included herein. Cultural Resource mitigations would reduce impact to less than significant.

Mitigation is also required to reduce impacts to air quality, hydrology & water quality, and hazards to people from hazardous materials below the level of significance. Required mitigation is summarized in Table ES-2.

Measures required to achieve compliance with the Clean Air Act and the Federal Endangered Species Act are necessary to reduce impacts to air quality and biological resources to maintain are summarized in Table ES-3.

Potential impacts related to aesthetic resources, biological resources (lighting only), geology & soils, greenhouse gasses, and utilities would be less than significant. Implementation of Best Management Practices (BMP's) will further minimize environmental impacts and ensure a high quality sustainable project (Table ES-4).

Implementation of all BMP's, avoidance strategies, minimization measures, and mitigation will allow the Proposed Action to result in beneficial effects related to aesthetics (a visually pleasing parking lot), geology and soils (less erosion downslope due to stormwater runoff), hazardous materials (removal of asbestos and lead based paint), hydrology and water quality (less stormwater runoff), and utilities (reduced load on existing utility systems).

A summary of potential impacts for each alternative are summarized in Table ES-1.

ES.5 PUBLIC COMMENT AND REVIEW

A Notice of Availability (Appendix A) of the Draft EA/Draft FNSI was published on July 23, 2020 in the Monterey County Weekly notifying the public of the availability of the Draft EA/Draft FNSI and initiating the 30-day public comment period.

An electronic version of the Draft EA/Draft FNSI is available on the USAG POM website at: https://home.army.mil/monterey/index.php/about/garrison-directorates/public-works/public-notice-environmental-assessment-and-impact

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In accordance with the Intergovernmental Cooperation Act of 1968 (42 U.S.C. 4231(a)) and the Intergovernmental Review of Federal Programs (Executive Order (EO) 12372), which require federal agencies to cooperate with and consider federal, state, and local interests in implementing a proposal, USAG Presidio of Monterey has provided notice of the Draft EA/Draft FNSI to agencies and organizations. A list of individuals and organizations that have been mailed notices about the availability of the Draft EA/Draft FNSI and how to comment is provided in Appendix A.

The public can send comments to

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Table ES-1: Summary of Impacts by Alternative

	Proposed Action (Alternative 1) Parking lot with LID features	Alternative 2- Conventional Parking lot	Alternative 3- No Action Alternative
Aesthetics	Beneficial Impact	Less than significant	No Impact
Air Quality	Less than significant with mitigation	Less than significant with mitigation	No Impact
Agricultural Resources	No Impact	No Impact	No Impact
Biological Resources	Less than significant with measures for other compliance	Less than significant with measures for other compliance	No Impact
Cultural Resources	Less than significant with mitigation	Less than significant with mitigation	No Impact
Environmental Justice	No Impact	No Impact	No Impact
Geology and Soils	Less than significant	Less than significant	No Impact
Greenhouse Gasses	Less than significant	Less than significant	No Impact
Hazards and Hazardous Material	Less than significant with mitigation	Less than significant with mitigation	No Impact
Hydrology and Water Quality	Less than significant with mitigation then Beneficial Impact	Less than significant with mitigation	Less than significant
Land Use and Planning	No Impact	No Impact	No Impact
Mineral Resources	No Impact	No Impact	No Impact
Noise	Less than significant with mitigation	Less than significant with mitigation	No Impact
Population and Housing	No Impact	No Impact	No Impact
Public Services	No Impact	No Impact	No Impact
Recreation	No Impact	No Impact	No Impact
Socioeconomics	No Impact	No Impact	No Impact

	Proposed Action (Alternative 1) Parking lot with LID features	Alternative 2- Conventional Parking lot	Alternative 3- No Action Alternative
Traffic and Transportation	Beneficial Impact	No Impact	No Impact
Utilities and Service Systems	Beneficial Impact	Less than significant	No Impact

Table ES-2: Summary of Required Mitigation

Resource	Mitigation Required
Air Quality	Air Quality (AQ) Required Mitigation-1: Adhere to NESHAP rules on standard practices for asbestos emission controls during demolition activities. • All building materials that will be disturbed will either be tested to confirm presence of asbestos or if not tested, assumed to contain asbestos. Asbestos Containing Materials (ACM) and assumed ACM will be handled according to applicable laws and regulations with an asbestos certified contractor. • Notification to the MBARD is required. Thresholds and notification are outlined in the Asbestos NESHAPs and District Rule 424 Guidance. • Copies of survey results, abatement plans, and contractor certifications will be submitted to and reviewed by USAG POM Environmental Division prior to commencement of the project. Air monitoring results, reports, and completion reports shall be submitted to USAG POM Environmental Division at the completion of the project for required record keeping and to document ACM removal and handling.
Cultural resources	Cultural Resources (CR) Required Mitigation-1: Document Buildings 279, 281, 282 and 283 in accordance with the Historic American Buildings Survey (HABS) documentation standards: • In large format (4 inch x 5 inch or larger negative size) photographs showing the resources in context as well as details of their historic architectural features, which shall be processed for archival permanence in accordance with the enclosed photographic specifications. Specifically: ○ General contextual views of the buildings showing them in relationship to the surrounding buildings, structures and landscape;

Resource	Mitigation Required
	○ Views of all elevations of each building (oblique views of buildings 279 and 282); ○ Views of exterior architectural details, including windows, entryways, siding, roof, and any other significant elements; ○ Views of interior spaces and interior historic detailing; ○ A separate photographic index shall be prepared for each building; ○ Provide 8 inch by 10 inch photographic reproductions of original construction drawings; ○ Provide three written historical and descriptive reports shall be prepared for each building according to HABS guidelines; CR-2: Donate the HABS to the National Park Service, where it will be accessible to the public at the Library of Congress. The HABS will also be accessible to the public in the Historic Records Collection (archives), of the U.S. Army's Defense Language Institute Foreign Language Center, Monterey, California. CR-3: An archaeologist meeting the Secretary of Interior Standards (per 36 CFR § 61) and a Native American consultant will be on-site during ground disturbing activities associated with this Undertaking to ensure a prompt response in the event of an unanticipated discovery of cultural resources. If, during the course of the Undertaking, there is an unanticipated discovery of cultural resources, all construction activity within 30-meters (100-feet) of the resource shall immediately halt. Any exposed archaeological or historic resource will be protected from further harm. The Army will inspect the discovery and will apply the National Register criteria to determine if the discovery is eligible for listing in the NRHP. The Presidio may assume a property to be eligible pursuant to 36 CFR 800.13(c). The Presidio shall notify the SHPO, the ACHP, and Native American tribe(s), as appropriate, within 48 hours of the discovery and shall provide formal notification of the Army's assessment of National Register eligibility and proposed actions to resolve any adverse effects.

Resource	Mitigation Required
	The SHPO and the Native American tribe(s) shall respond within 48 hours of the notification. The Presidio shall take into account their recommendations regarding National Register eligibility and the proposed actions, and then carry out the appropriate actions. The Presidio shall provide the Consulting Parties a report of the actions when they are completed. Should the discovered cultural resource be identified by Native Americans as a property of traditional cultural or religious significance, the Presidio will consult with the appropriate Tribe regarding eligibility and treatment. Post-review discoveries which are not being adversely affected by the activity and which can be avoided, will be protected, monitored, and to the extent possible, avoided by future operations. CR-4: If an inadvertent discovery of human remains occurs, work shall cease within 30-meters of the find for 30 days and immediate notification must be made to the Presidio Cultural Resources Program Manager (CRM). The Presidio CRM will preliminarily determine if the remains are from a recent crime scene (50 years old or less) or are of Native American descent and will immediately notify the Presidio Garrison Commander. If the remains appear 50 years old or less, the Army's Criminal Investigation Command will assume control of the crime scene. If the remains appear to be of Native American descent, the Presidio will coordinate with the appropriate Native American tribes. An inadvertent discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony will require implementation of procedures set forth in the ICRMP and AR 200-1, which includes consultation procedures and planning requirements in accordance with Section 3 of NAGPRA; 25 U.S.C. 3001 et seq.; 43 CFR 10).
Hazards and Hazardous Material	Hazardous Materials (HM) Required Mitigation-1: A spill contingency and containment plan would be prepared and implemented in the event that hazardous materials are accidentally spilled during construction. Engineering controls that may be used during construction to protect water resources may include, but would not be limited to: hay bales and silt fencing. In addition, inspection and monitoring for compliance with the permit requirements would be implemented.

Resource	Mitigation Required
	HM-2: In the event the that MEC is suspected or encountered, there shall be no attempt to disturb, remove, or destroy it, but shall cease any intrusive or ground-disturbing activities being conducted at the project and immediately notify the Presidio police or fire department so that appropriate personnel can be dispatched to address such MEC. HM-3: Conduct surveys for the presence of ACM, LBP, PCBs, and other hazardous and toxic substances prior to demolition. Utilize licensed contractors to remove or encapsulate ACM, LBP, PCBs, and other hazardous and toxic substances during demolition in accordance with all federal, state, and local laws and regulations. HM-4: Soils in the vicinity of Building 281 should be tested for potential contaminants. Should the soil be contaminated, it should be handled and disposed of in accordance with Presidio of Monterey procedures and all federal, state, and local laws and regulations. HM-5: Conduct construction activities in accordance with applicable health and safety requirements (e.g., use of personal protective equipment, establishment of dedicated smoking areas, etc.) to minimize the potential for adverse effects to workers. HM-6: All hazardous and toxic substances must be properly disposed of in accordance with Presidio of Monterey procedures all federal, state, and local laws and regulations.
Hydrology & Water Quality	Hydrology & Water (HW) Quality Required Mitigation- 1: Disturbance of one acre or more requires enrollment under the Construction General Permit, which requires the preparation of a SWPPP and implementation of stormwater BMPs. Typical BMP's depending on the requirements of the permit might include, but are not limited to: HW-2a: Schedule work to minimize soil disturbing activities during predicted rain events. Consider rescheduling activities for dry periods to minimize maintenance requirements.

Resource	Mitigation Required
	HW-2b: Develop the sequencing and timetable for the start and completion of each item such as site clearing and grubbing, grading, excavation, paving, pouring foundations, installing utilities, etc., to minimize the active construction area. HW-2c: Schedule major grading operations during dryer months when practical. HW-2d: Stabilize inactive areas within 15 days from the cessation of soil-disturbing activities or one day prior to the onset of precipitation, whichever occurs first. HW-2e: Monitor the weather forecast for storm events, which are storms that produce or are forecasted to produce at least 0.1 inch of precipitation within a 24-hour period. When rainfall is predicted, adjust the construction schedule to allow the implementation of soil stabilization, sediment controls, and, if applicable, sediment treatment controls on all disturbed areas prior to the onset of rain. HW-2f: Preserve existing vegetation that provides erosion and sediment control benefits to the extent practicable, protect tree trunks, identify sensitive areas, and consider vegetation preservation when establishing staging areas. HW-2g: Utilize a stabilizing compound such as hydraulic mulch, hydroseeding, cellulose fiber, or soil binders. HW-2h: Install silt fencing around soil stockpiles and at the toe of steep slopes.
Noise	Noise Required Mitigation N-1: The following construction-related noise measures shall be implemented during the proposed action: • The construction contractor shall ensure that all equipment has the manufacturers' recommended noise abatement measures, such as mufflers, engine enclosures, and engine vibration isolators, intact and operational. Further, all construction equipment shall be inspected at periodic intervals to ensure proper maintenance and presence of noise control devices. • Construction activities shall be limited to daytime hours (8:00 A.M. to 5:00 P.M.). In addition, the POM currently promotes quiet hours during the normal workweek for some construction projects. This could include quiet hours between 6:00 A.M. and 10:00 A.M. on specific workdays, if requested by affected staff.

Resource	Mitigation Required
	• Local neighborhoods shall be notified of the project, and signs should be posted that provide a phone number to call to register complaints about construction-related noise. N-2: In the event of exceedances beyond allowable peaks, or excessive complaints use temporary noise barriers at project boundary.

Table ES-3: Summary of Required Measures Driven by other Regulatory Requirements

Resource	Avoidance or Minimization Measure
Air Quality	Air Quality (AQ) Required Measure 1- Compliance with Standard MBARD Emission Control Measures. Construction activity would be required to comply with the following standard MBARD emission control measures to reduce fugitive dust and construction related emissions of PM10: • Water all active construction areas as required with acceptable non-potable water sources to the extent feasible, with frequency based on the type of operation, soil, and wind exposure, and minimized to prevent wasteful use of water. • Prohibit all grading activities during periods of high wind (over 15 mph). • Apply chemical soil stabilizers on inactive construction areas (disturbed lands within Construction Projects that are unused for at least four consecutive days). • Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area. • Haul trucks shall maintain at least 2'0" of freeboard. • Cover all trucks hauling dirt, sand, or loose materials. • Plant vegetative ground cover in disturbed areas as soon as possible with Presidio approved plants or utilize another approved stabilization method to minimize erosion. • Cover inactive storage piles. • Install wheel washers at the entrance to construction sites for all exiting trucks. • Sweep streets if visible soil material is carried out from the construction site. • Where feasible, use construction equipment that conforms to MBARD's Tier 3 or Tier 4 standards. • Whenever feasible, construction equipment shall use alternative fuels such as compressed natural gas, propane, electricity, or biodiesel. • If any trees or vegetation are disposed of via wood chipping, the operator shall contact MBARD's Engineering Division at (831) 647-9411 to discuss if a Portable Registration is necessary for the wood chipper being utilized for the project.

	Time spent on exposed soil surfaces shall be minimizes, where possible, machinery should operate from paved surfaces.
Biological resources	Biological Resources (BR) Required Measure-1: Worker Environmental Awareness Program (WEAP). Prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend WEAP training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the project area, including Yadon's piperia. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, review of the limits of construction and mitigation measures required to reduce impacts to biological resources in the work area, and penalties for non-compliance. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. All personnel shall sign a form, provided by the trainer, documenting they have attended the WEAP training and understand the information presented to them. BR-2: Nesting Bird Protection - For projects that may result in tree felling or removal of trees or vegetation that may contain a nesting bird, construction activities should occur outside of the nesting season, if feasible, generally between September 1 and January 31. If construction activities must occur during the nesting season (generally February 1 to August 31), surveys for nesting birds covered under the Migratory Bird Treaty Act shall be conducted by a Directorate of Public Works Environmental Division- (DPWE) approved biologist no more than 10 days prior to vegetation removal. The surveys shall include the entire disturbance area plus a 500-foot buffer around the site, as feasible. If active nests are found, all construction work shall be conducted outside a buffer zone from the nest to be determined by the approved biologist and DPWE. Typical buffer distances consist of up to 250 feet for non-raptor bird species and up to 500 feet for raptor species. Larger buffers may be required based upon the species, status of the nest, and type of construction activities occurring near the nest. The buffer area(s) shall be closed to all

	construction personnel and equipment until the adults and young no longer rely on the nest site. A DPWE-approved biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. BR-3: Invasive Weed Prevention/Reseeding – • Plant species used for landscaping shall not include invasive or noxious species. If invasive species such as French broom, Eucaplytus sp., pampas grass (*Cortaderia* spp.), or ice plant (*Carpobrotus edulis*) are discovered in area proposed for disturbance they shall be removed. All equipment, including clothes and shoes, shall be free of seeds prior to entering the work area. All invasive plant seeds shall be contained (in plastic bags) and taken to an appropriate disposal facility. • If disturbed areas require reseeding or hydroseeding, a DWPE approved mix of locally native species shall be used. BR-4: Avoid negative impacts to protected trees (including Monterey pine, coast live oak, and Monterey cypress) to the maxim extent feasible, by installing temporary fencing around all trees identified for preservation prior to work. Generally fencing shall be located at the edge of the root zone, located out a distance 15 times the DBH in all directions. Fencing shall be rigidly supported and maintained during the project. Fenced areas shall not be used for material stockpile, or equipment. BR-5: Ensure that no irrigation, trenching, compaction, or other soil condition altering activities occur within the drip line of naturally occurring Monterey pine, coast live oak trees, Monterey cypress, and horticultural trees unless necessary or unavoidable. Such activities can compromise the health and structural stability of the tree, and can create a safety hazard. If unavoidable, the proponent shall coordinate the activity with an ISA-certified arborist and Presidio of Monterey Environmental Division. BR-6: Tree replacement would be per the Presidio INRMP as assessed by the Presidio Natural Resource Manager (NMR). Final landscape design must be in accordance with the INRMP and approved by the NRM.

Table ES-4: Summary of BMP's to increase project sustainability

Resource	BMP
Aesthetic resources	Aesthetic Resources (AR) BMP -1: Retention of mature large trees and use of night-sky friendly parking lot lighting will reduce the geographic area of impacts to aesthetic resources.
Biological Resources	BR BMP-1: To the extent feasible, as permitted by with FP/ATP, night sky friendly parking lot lighting should be used. Specifications for this lighting can be found in International Dark Sky Association and Illuminating Engineering Society of North America's Model Lighting Ordinance (2011).
Geology and Soils	Geology and Soils (GS) BMP 1- Modified hillslopes associated with the constructed project shall be constructed to ensure stable post-construction conditions. Soil stabilization may include, but is not limited to: • Reinforcement measures, such as anchors or micropiles, to increase the shear strength of the hillslope. • Surface stabilization, such as shotcrete, to increase the surface strength of the hillslope. • Drainage mechanisms to reduce the water pressure in the vicinity of the hillslope and to prevent over-saturation of soils. • Geometry modifications to reduce the angle of the hillslope and minimize the potential for landslide.
Greenhouse Gasses	Greenhouse Gas (GHG) BMP 1- Retain mature trees where feasible. GHG BMP 2- Consider the installation of bike racks to encourage the use of more carbon friendly methods of transportation.
Utilities & Service Systems	Utility and Service Systems BMP-1: Use energy efficient lighting where possible.

Contents

1. Purpose and Need for the Proposed Action

1.1 INTRODUCTION

The Presidio of Monterey (Presidio) is a small installation covering less than 400 acres nestled in between the City of Monterey and City of Pacific Grove, California, one of five installation sites managed by the United States Army Garrison Presidio of Monterey (USAG Presidio). Vehicle parking at Presidio is so limited that some areas of the installation have become “unofficial” parking locations leading to resource damage and inefficient use of valuable installation space. Due to the need for added vehicle parking capacity and a rise in the creation of unofficial parking locations, the USAG Presidio seeks to construct a parking lot in the northeast part of the installation. In addition, Stilwell road which runs adjacent to the parking area will be realigned to allow a safer turn on to Bolio road, simultaneously reducing congestion. Currently, this section of the Presidio is served by a small parking area which accommodates approximately 30 vehicles. Overflow parking occurs on the street and on any other flattened accessible space. The USAG Presidio is proposing to demolish four existing buildings and construct an American with Disabilities Act (ADA) compliant parking lot with Low Impact Development (LID) features and improve traffic circulation surrounding the parking lot. This Draft Environmental Assessment (EA), evaluates the potential environmental impacts resulting from the Proposed Action, Alternatives, and the No Action Alternative.

The Draft EA was developed in accordance with the National Environmental Policy Act (NEPA) and implementing regulations in Title 40 Code of Federal Regulations (CFR) Parts 1500 through 1508 (40 CFR 1500–1508) (President’s Council on Environmental Quality [CEQ], 2002), 32 CFR 651 (Office of the Deputy Assistant Secretary of the Army, 2002), and Army Regulation (AR) 200-2. The purpose of the Draft EA is to inform decision-makers and the public of the likely consequences to the human environment of the proposed action and alternative actions. The Draft EA identifies mitigation measures to reduce the level of resource impact to below significant.

1.2 PROJECT LOCATION AND PRESIDIO OF MONTEREY BACKGROUND

The Presidio has been under some form of military control since 1770. Consequently, it remains considerably undeveloped as opposed to the dense municipalities which have enveloped it. The Presidio is located in Monterey County on the Central Coast of California (Figure 1-1).

The Monterey Bay is one of the largest bays in California, second only to San Francisco Bay which is located just 75 miles to the north. It is unmatched however, in diversity. Extending from Santa Cruz in the north to the southern end of the Monterey Peninsula, the shoreline covers approximately 45 miles. Located on the Pacific Ocean, this area enjoys a Mediterranean climate which experiences warm to hot dry summers and cool, wet winters. The entire peninsula lies over the Salinian block, which is composed of granite. However, the overlying sand dunes and exposed cliffs are highly erodible. The Presidio lies within the Central Coast subregion of the Central Western Region of the California Floristic Province. This subregion is characterized by coastal bluffs on the coast, with salt marshes, coastal prairie, and coastal-sage scrub occurring inland.

Figure 1-1: Installation boundary and regional context

The Presidio covers 392 acres (Figure 1-2) and contains the 75 acre Presidio of Monterey Historic District (Figure 1-3), which is eligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historic Places (CRHP). The historic district includes the Lower Presidio Historic Park, which is listed on the NRHP and is also a state listed Native American Sacred Site. The historic district is managed via a Programmatic Agreement between the U.S. Army, the Advisory Council on Historic Preservation and the California State Historic Preservation Officer.

Figure 1-2: Installation boundary

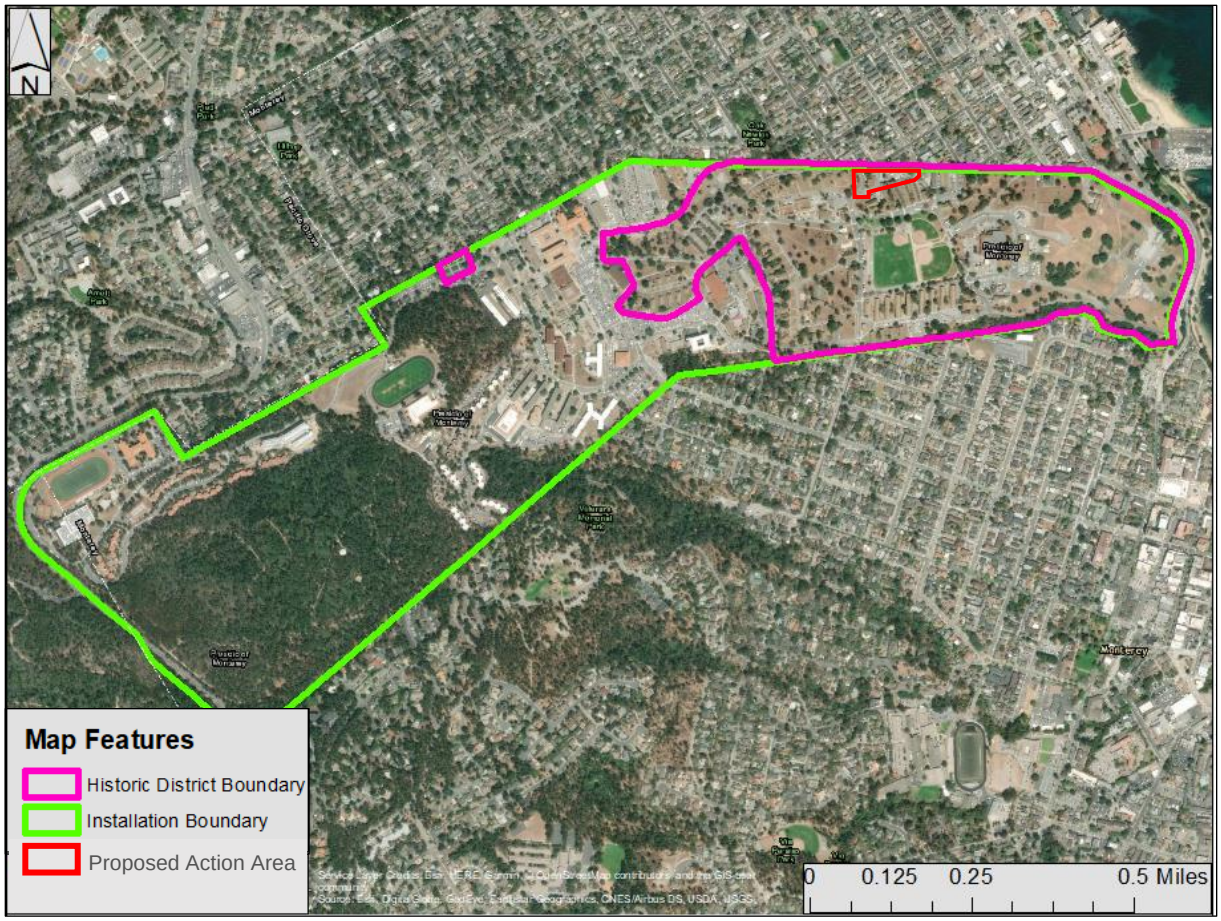

Figure 1-3: Extent of the historic district on the installation

For over 10,000 years, Native Americans stewarded the lands that now comprise the Presidio. In approximately 1770, the Spanish took control of the area and established a military fort, which was then passed to the newly independent nation of Mexico in 1822. In 1846, the United States took control of the area along with the rest of California and designated the existing fort as Federal Lands to maintain military control of the post which possessed a commanding view shed and thereby strategic advantage of Monterey Bay. Within the Presidio historic district, structures representative of the 1902-1939 American period Infantry, Calvary, and Artillery cantonment include 76 buildings, 20 structures, three monuments, roads, rock walls, surface stormwater conveyance systems, and cultural landscapes that have been preserved and are still in use (Presidio, 2018). Remnants related to the Native American occupation of the area and Spanish, Mexican and U.S. military redoubts, in conjunction with the adjacent City of Monterey's "Old Town Historic District," which is a National Historic Landmark, create a rich and storied landscape upon which future development must be carefully considered.

While many of the historic structures on the Presidio are still in use today some of the buildings are in need of repair. Buildings in the Historic District on the Presidio that are considered in this Draft EA include buildings 279, 281, 282, and 283, which are

contributing elements to the Presidio Historic District. The buildings are described in detail in section 4.6 of this document.

Currently the Presidio is home to the Defense Language Institute Foreign Language Center (DLIFLC). The DLIFLC is the largest foreign language training facility in the western world. The mission of the DLIFLC is to provide culturally based foreign language education and training for Department of Defense (DoD) personnel. This military operation helps ensure success of the defense language program and enhance national security. Attendance at DLIFLC could increase over the coming years due to the increased prevalence of reconstruction and intelligence missions.

1.3 PURPOSE AND NEED

The purpose of the proposed action is to efficiently utilize limited installation space while providing adequate, ADA accessible parking within the constraints of the installation boundaries and improve traffic circulation at Presidio in a manner which is protective of the environment and consistent with AT/FP and long range planning objectives. The proposed action is needed because of unauthorized parking occurring around buildings 279, 281, 282, and 283. This unofficial parking is out of compliance with anti-terrorism force protection standards and is not ADA compliant. Current antiterrorism force protection standards mandate parking areas be planned and relocated on the perimeter of the military installations. Use of the unlit and unpaved portions of the unauthorized lots creates unsafe conditions for drivers and pedestrians due to lack of directional pavement markings and signage. The alignment of the road serving this parking area also contributes to unsafe conditions for drivers, due to a sharp turn, which also exacerbates traffic congestion. Additionally, the poor condition of the pavement accelerates wind and water erosion of the underlying soil resulting in runoff which has unnecessary adverse impacts on surface water quality. Further, parking spaces and drive isles are not clearly marked or optimized which results in an inefficient use of space. There are currently approximately 3,625 available parking spaces on the installation. Base wide, more than 400 spaces are needed. Parking deficiencies are due to inability to meet the prescribed number of spaces per building occupancy. Current deficiencies plus potential for future increase in students and support staff would exacerbate the parking situation.

1.4 SCOPE AND CONTENT OF THE EA/EIS

The scope of the EA includes the actions proposed; alternatives considered; a description of the existing environment; and direct, indirect, and cumulative impacts. The scope of the Proposed Action and the range of alternatives to be considered are presented in Section 2. U.S. Army NEPA-implementing regulations, 32 CFR § 651 (as amended), require consideration of the No Action Alternative, which is analyzed to provide the baseline against which the environmental impacts of implementing the range of alternatives addressed can be compared. The Draft EA identifies appropriate measures that are not already included in the Proposed Action or alternatives in order to avoid, minimize, or reduce adverse environmental impacts. The Draft EA identifies mitigation measures to reduce the level of resource impact to below significant.

The Draft EA identifies the environmental impacts of the Proposed Action and No Action Alternative on affected resource areas. Per CEQ regulations (40 CFR § 1501.7[a][3]), only those resource areas that apply to the Proposed Action and alternatives will be analyzed in detail. The following resource areas will be analyzed and discussed for potential impacts from implementation of the Proposed Action and No Action Alternative: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gasses and Climate Change, Hazards and Hazardous Material, Hydrology and Water Quality, Noise, Traffic & Transportation, and Utilities and Service Systems. No impacts are anticipated for the areas of Agriculture and Forestry, Environmental Justice, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation or Socioeconomics.

1.5 PUBLIC PARTICIPATION

NEPA encourages lead agencies responsible for preparation of an EA to coordinate with the public and other governmental agencies and to solicit input on their Proposed Action early in the decision-making process. This section discusses planned agency, tribal, and public review of the Draft EA and Draft FNSI and consultations on the Proposed Action.

1.5.1 Public/Agency Review of Draft EA and Draft FNSI

Public participation opportunities with respect to the Draft EA/Draft FNSI, and decision making on the Proposed Action are guided by 32 CFR Part 651.14. A Notice of Availability (NOA) of the Draft EA/Draft FNSI has been published in the Monterey County Weekly. The publication of the NOA will initiate a 30-day review period.

The Draft EA/Draft FNSI will be available for review beginning on July 23, 2020.

An electronic version of the Draft EA/Draft FNSI is available on the USAG POM website at: https://home.army.mil/monterey/index.php/about/garrison-directorates/public-works/public-notice-environmental-assessment-and-impact

A hard copy of the Draft EA/Draft FNSI is available upon request at SPK-pao@USACE.Army.mil.

Comments on the Draft EA/Draft FNSI should be sent to:

ATTN: Planning Division
U.S. Army Corps of Engineers, Sacramento District,
1325 J Street, Sacramento, CA 95814
or via electronic mail to
SPK-pao@USACE.Army.mil

At the closing of the public review period, applicable comments from the general public and interagency and intergovernmental coordination/consultation will be incorporated into the analysis of potential environmental impacts performed as part of the EA, where applicable, and included in Appendix A of the Final EA.

In accordance with the Intergovernmental Cooperation Act of 1968 (42 U.S.C. 4231(a)) and the Intergovernmental Review of Federal Programs (Executive Order [EO] 12372)

that require federal agencies to cooperate with and consider federal, state, and local interests in implementing a proposal, a notice of the Draft EA/Draft FNSI will be provided to interested agencies and organizations. A list of individuals and organizations which may be interested will be generated from previous documents. A copy of the notice of availability, which provides instructions on how to comment, will be included in the appendices of the final document.

1.5.2 National Historic Preservation Act

Per the requirements of Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. 306108) and implementing regulations (36 CFR § 800), federal agencies are required to evaluate the effects of their undertakings on historical, archaeological, and cultural resources. In accordance with 36 CFR 800.2(d), the Army invited the public to participate in consultation under the NHPA by publishing a notice of availability in the Monterey Herald on November 4 and 5, 2013 that allowed for a 30-day public comment period. The notice identified four locations where the consultation could be reviewed: the Presidio website, the Monterey Public Library, the Chamberlain Library and the Presidio Directorate of Public Works; however, the Army did not receive any public comments. The Army also invited the City of Monterey, the Alliance of Monterey Area Preservationists and the Ohlone/Costanoan-Esselen Nation (OCEN) to participate in consultation. The OCEN requested that a Native American consultant monitor ground disturbance associated with this Undertaking.

In accordance with Section 106 of the NHPA, the Presidio is nearing completion of consultation with the California State Historic Preservation Officer (SHPO) and is in the process of finalizing a memorandum of agreement (MOA). The MOA was available for public review from January 09, 2020 to March 09, 2020. The full details of the consultation history can be found in the Section 106 consultation and are included in Appendix A. The Army and the SHPO concur that the Undertaking would not adversely impact the Presidio Historic District and all buildings would be appropriately recorded.

1.5.3 EO 13175- Consultation and Coordination with Indian Tribal Governments

EO 13175, Consultation and Coordination with Indian Tribal Governments, directs federal agencies to coordinate and consult with Native American tribal governments whose interests might be directly and substantially affected by activities on federally administered lands. Consistent with that EO, DoD Instruction 4710.02, and DoD Interactions with Federally-Recognized Tribes, federally recognized tribes that are historically affiliated with the Presidio geographic region will be invited to consult on all proposed undertakings that potentially affect properties of cultural, historical, or religious significance to the tribes.

The tribal consultation process is distinct from NEPA consultation or the intergovernmental coordination process, and it requires separate consultation with all relevant tribes on a government-to-government basis. The timelines for tribal consultation are also distinct from those of other consultations.
In accordance with 36 CFR 800.2(c)(2)(ii)(D), the Army consulted on the proposed undertaking with the following federally recognized tribes: Picayune Rancheria of the Chukchansi Indians, Santa Rosa Indian Community of the Santa Rosa Rancheria, Table Mountain Rancheria, Tule River Indian Tribe of the Tule River Reservation, and

the Tuolumne Band of Me-Wuk Indians of the Tuolumne Rancheria of California. These five tribes were recently determined to be aboriginal land tribes associated with the installation. On August 26, 2019, hard copy letters were sent to the tribes and follow up phone calls and e-mails were sent November 8, 2019. On November 8, 2019, Table Mountain Rancheria responded via e-mail requesting that a Native American consultant from the Ohlone/Costanoan-Esselen Nation be on-site to monitor ground disturbing activities associated with this project. Details of the consultations are included in Appendix A.

1.5.4 Endangered Species Act

The actions proposed in this Draft EA are wholly covered under the Formal Consultation for the Presidio of Monterey Real Property Master Plan, Monterey Country, California (8-8-13-F-29) dated July 18, 2013. As the proposed action is a minor construction project as specifically described by the Biological Opinion (BO) the requirements of Section 7 of the Endangered Species Act and implementing regulations (50 CFR § 17), including the Migratory Bird Treaty Act, are considered complete. This project is bound by the applicable conservation measures described as a part of the Proposed Action as well as the non-discretionary Terms and Conditions. The BO is included in Appendix A.

1.5.5 Coastal Zone Management Act

The Coastal Zone Management Act (CZMA) provides for the management of the nation's coastal resources, with the goal to "preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone." The Proposed Action is not located within the coastal zone and is not anticipated to have any direct or spillover effects on the coastal zone, with implementation of proposed mitigation measures, as discussed in Land Use and Planning, Table 4.2.

2. Proposed Action and Alternatives

2.1 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

The USAG Presidio is analyzing alternatives to address the need to remedy haphazard parking and improve traffic circulation at the Presidio. Alternatives must meet screening criteria that include consideration of environmental factors that appropriately minimize avoidable impacts while providing adequate, ADA compliant parking, within the constraints of the installation boundaries in accordance with AT/FP and long range planning policies. The USAG Presidio proposes to demolish buildings 279, 281, 282, and 283 and construct a parking lot within the footprint of the demolished buildings (Figure 2-1). Stilwell road will be concurrently realigned to support the new parking area, increase driver safety, and reduce traffic congestion (Figure 2-2). The two types of parking lots being considered are a parking lot with Low Impact Development (LID) features, and a conventional parking lot. While the No Action Alternative does not meet the USAG Presidio's purpose and need, it is considered in the Draft EA pursuant to CEQ regulations to provide a baseline against which the impacts of the Proposed Action Alternative can be evaluated. Other alternatives which were considered but eliminated from further analysis, discussed in section 2.6, include the construction of a parking garage, leasing space off site, and expanding parking in the Lower Presidio Historic Park.

Figure 2-1: Area showing overall project footprint and buildings proposed for demolition: 279, 281, 282, and 283

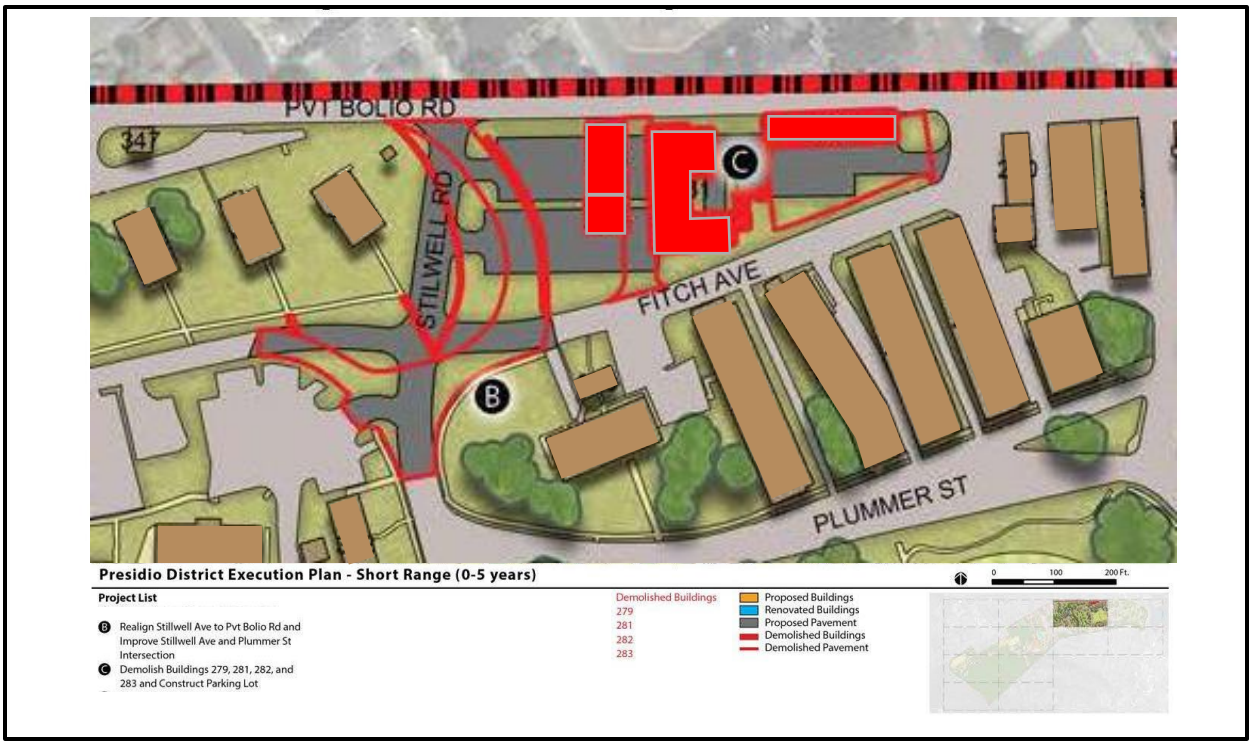

Figure 2-2: Conceptual drawing showing proposed road realignment

2.2 SCREENING CRITERIA

Screening criteria enable the Army to critically evaluate whether all reasonable alternatives are included in the scope. Screening criteria which must be met by alternatives carried forward for analysis include:

- Mission Compatibility – Alternatives must support the mission of the USAG Presidio, the DLI FLC and other tenants.
- Land Constraint Considerations – Alternatives must fit within multiple land constraints as given.
- Master Plan/Area Development Plan Conformance – Alternatives must be consistent with long term planning objectives of the Presidio.
- Feasibility – Alternatives must be capable of being implemented.
- Purpose and Need – Alternative must meet the purpose and need for the action to improve parking and traffic circulation.

2.3 ALTERNATIVE 1 – LID PARKING LOT (PROPOSED ACTION)

The USAG Presidio is proposing to demolish four buildings in the Presidio Historic District, realign Stilwell Road to improve traffic circulation, and construct a parking lot with LID features entirely within the constraints of the Presidio.

The location for the proposed action is along the northern border of the installation bounded by Private Bolio Road to the north, Building 345 to the west and Fitch Avenue to the south and east, within the Historic District.

In summary, the proposed action includes:

- Building demolition
- Pavement demolition
- Removal of approximately 10,000 square feet of vegetation
- All necessary grading and site preparation work
- Construction of a permeable pavement surface
- Construct sidewalks
- Road Realignment
- Construction of bioswales
- Planting of trees and vegetation
- Installation of curb cuts, markings, signage, stall and roadway delineation
- Installation of lighting and required support cabling

The proposed action consists of the demolition of four buildings, 279, 281, 282, 283, construction of a parking area in the footprint of the demolished buildings, and realignment of Stilwell Road surrounding the parking lot. The proposed demolition would consist of removing the existing wooden structures, demolishing the foundations and slabs. Construction of the parking area would include grading and installation of a parking surface with concrete curbs and wheel stops. LID features would be installed to manage stormwater runoff. LID features would include landscaping and/or bioretention swale in the islands between the parking lanes, permeable pavement, curb cuts to redirect water flow to reduce amount of runoff (Figure 2-3) and improve quality of runoff flowing to the Monterey Harbor, a CWA 303d impaired water body, and the Monterey Bay National Marine Sanctuary. Roadway improvements would allow for right turn onto Bolio Rd. from Stilwell Ave and a left turn onto Stilwell Ave. from Bolio Rd. These turns can’t currently be made due to the sharp angles of the roadways and cause increased traffic on Fitch Avenue.

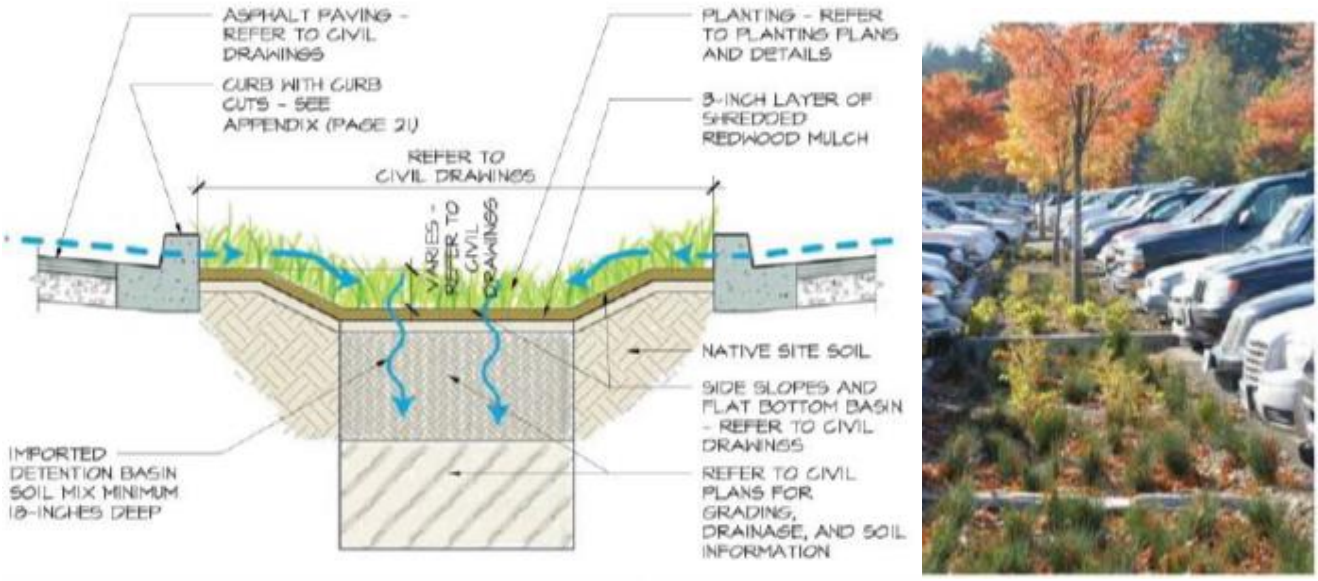

Figure 2-3: Conceptual and example bioswale

Provided funding is available, the project is anticipated to occur within the 2021-2022 timeframe. All actions would take place within the constraints of the installation and construction would likely take a single dry season to complete, however, the exact timeline is contingent on funding. Stormwater best management practices (BMPs) would be implemented both during demolition and construction phases. Access routes would be along existing roadways, construction would not likely impact flow of traffic on Bolio Road (to the north of the project area). Construction may impact traffic flow on Fitch but this traffic could be re-routed. Parking within the project area and along Fitch would be disrupted during construction. Staging and laydown would be on existing impervious surfaces and need not impact Presidio operations.

Full implementation of the action would commence with the demolition of the existing buildings with consideration given to the potential for asbestos containing material and lead based paint, which would be handled and removed in accordance with applicable laws and regulations. Following building demolition and debris disposal at a permitted landfill, existing pavement would need to be demolished and disposed of to allow the site to be graded. After demolition and grading the site could be constructed as designed. Permeable pavement and additional LID features would be installed to manage stormwater runoff, potentially including landscaping and/or bioretention swale in the islands between the parking lanes and curb cuts to redirect water flow to reduce amount of runoff. Overflow water will be directed to overland channels leading to the existing stormwater system for rare high flow events which may overwhelm the LID features. As the site is surrounded by paved roads, standard construction equipment should be sufficient to complete the demolition, grading, and construction. Watering for dust control, grading and other construction uses would be done with acceptable non-potable water sources to the extent feasible, with frequency based on the type of operation, soil, and wind exposure, and minimized to prevent wasteful use of water.

Temporary construction lighting, waste receptacles, portable toilets and support trailers would also need to be staged as these elements are not readily available on the Presidio. Stilwell Road would be realigned to improve area traffic circulation. No new permanent roadways or other transportation lines would be required as a part of this project, however a permanent electrical source may need to be upgraded to provide lighting; no other permanent utility installations are expected.

Once the site is operational, it is expected to cover approximately 1 acre and to provide 120 standard sized parking stalls measuring 9 feet by 20 feet demarcated by painted lines and cement curbs with accompanying appropriate ingress and egress roads. The number of ADA spaces designated will be consistent with the requirements of the law, of an estimated 120 standard spaces, five shall be ADA compliant with a minimum of one van accessible parking spot (ADA, 2010). Sufficient lighting would be provided in accordance with installation standards. After construction, the site is expected to remain in operation for the foreseeable future with only minimal maintenance on bioswales, air cleaning of permeable pavement, refreshing painted surfaces and maintenance of appurtenant landscaping, as required.

2.4 ALTERNATIVE 2 – CONVENTIONAL PARKING LOT

Similar to construction of the Proposed Action, construction of a conventional parking lot with asphalt pavement and an underground storm water system would necessitate the demolition of the four buildings, 279, 281, 282, and 283 realignment of Stilwell road, and construction of a parking area in the footprint of the demolished buildings. Construction of the conventional parking lot would proceed along the same schedule and timeframe as the Proposed Action, however, additional grading and excavation would be required to expand the existing storm drain network to encompass the new parking lot. Post construction maintenance of a conventional parking lot includes refreshing painted surfaces, periodic repaving, storm drain cleaning and maintenance, and maintenance of any landscaped vegetation.

2.5 ALTERNATIVE 3 - NO ACTION ALTERNATIVE

32 CFR Part 651 requires the alternative of no action be included in the analysis for all Army EAs. Inclusion of the No Action alternative “provides a benchmark, enabling decision makers to compare the magnitude of environmental effects of the action alternatives. Under the No Action Alternative, the parking lot would not be built and unauthorized parking would continue in and around the historic structures. Additional funds would be required to continue maintenance of the four buildings, 279, 281, 282, and 283. Parking would continue to be insufficient to meet the needs of the installation. Vehicle and pedestrian safety issues would continue and potentially increase. No additional ADA accessible parking would be created. The pavement would continue deteriorating water quality of the Monterey Bay National Marine Sanctuary and the 303d listed Monterey Harbor.

2.6 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

Alternative parking solutions including the construction of a multi-level parking garage, construction or use of offsite lots and establishment of a parking area within the Lower

Presidio Historic Park (LPHP) were considered. However, after considering the purpose of and need for the action applying the selection criteria and considering cost, these were determined non-viable alternatives.

2.6.1 Construction of a Multi-Level Parking Garage

Construction of a multi-level parking structure in the footprint of the demolished buildings was considered. The existing buildings are single story to two stories in height. However, a structure taller than two stories could potentially affect views of Monterey Bay from private residences. Further, the slope of the proposed project area is such that design of a parking structure would be costly. Finally, existence of a modern parking structure within the historic district would disrupt the character of the historic district. Based on these factors, this alternative was removed from further consideration.

2.6.2 Construction or Lease of a Parking Structure or Lot Off-Site

Construction or lease of an offsite parking structure or lot was considered. This alternative would avoid impacts to buildings in the historic district on the installation, however, would require acquisition of land (e.g. through a lease) which could take considerable time and involve considerable, potentially reoccurring, costs, in addition to any construction costs. This alternative would not meet the goal of enhancing AT/FP. Shuttles from the offsite lot would also incur additional costs. Finally, due to the constrained nature of the surrounding community, expanding outward is would be extremely challenging. As a result, the alternative to construct or lease space off-post was not carried forward for additional analysis.

2.6.3 New Parking Lot in Lower Presidio Historic Park

A parking area was considered within the LPHP. There is currently some parking available in this area and the proposed parking lot would increase parking to approximately 600 parking spaces. The LPHP is currently leased to the City of Monterey to maintain as a historic park open to the public and is known to contain sensitive cultural resources. Based on these factors, this alternative was removed from further consideration.

3. Resource Definitions, Applicable Regulations, and Approach to Analysis

3.1 AESTHETICS

Visual and aesthetic resources include natural and manmade physical features that provide the landscape its character and value as an environmental resource.

Situated on a sloping hillside above the city of Monterey, the Presidio ranges in elevation from approximately 770 feet above sea level at its highest point in the Upper Presidio, to approximately 30 feet above sea level at its lowest elevation in the Lower Presidio. The Presidio overlooks Monterey Bay, which is the most prevalent view from the installation. The California Coastal Act (CCA) considers and protects scenic and visual qualities of coastal areas as resources of public importance (Section 30251). See Section 3.7.1 for requirements under the Coastal Zone Management Act (CZMA).

3.2 AIR QUALITY

Air resources are defined as breathable and surrounding gases in a given area to include the upper atmosphere. Air resources include volumes which may be polluted by substances which are directly harmful to human health, such as ozone, or indirectly harmful to human health and well-being, such as greenhouse gases. For the purposes of this Draft EA, air resources include any volumes which may be affected directly or indirectly as a result of proposed project actions.

3.2.1 Federal Regulations

The Clean Air Act (CAA) of 1970, as amended (42 U.S.C. § 7401), is a federal law designed to protect public health and welfare from harmful types of air pollution caused by various vectors in the United States. Thresholds are embodied in National Ambient Air Quality Standards (NAAQS) codified in 40 CFR part 50. NAAQS set the baseline wherein primary standards define, with an adequate margin of safety, the level protective of public health, and secondary standards define the level protective of public welfare. Areas are classified as “attainment” if they meet the NAAQS for a criteria pollutant and “nonattainment” if they exceed the NAAQS. NAAQS are established for common pollutants (Table 3-1), called criteria pollutants, including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter equal to or less than 10 microns in diameter (PM10), particulate matter equal to or less than 2.5 microns (PM2.5), and lead (Pb).

TABLE 3-1. SUMMARY OF NATIONAL AMBIENT AIR QUALITY STANDARDS

		National Standards	
Pollutant	**Averaging Time**	**Primary**	**Secondary**
Ozone (O3)	1 hour	--	--
	8 hour	0.07 ppm (137 µg/m3)	0.07 ppm (137 µg/m3)
Respirable Particulate Matter (PM10)	24 hour	150 µg/m3	150 µg/m3
	Annual		--
Fine Particulate Matter (PM2.5)	24 hour	35 µg/m3	35 µg/m3
	Annual	12 µg/m3	15 µg/m3
Carbon Monoxide (CO)	1 hour	35 ppm (40 mg/m3)	--
	8 hour	9 ppm (10mg/m3)	--
Nitrogen Dioxide (NO2)	1 hour	100 ppb (188 µg/m3)	--
	Annual	0.053 ppm (100 µg/m3)	0.053 ppm (100 µg/m3)
Sulfur Dioxide (SO_2)	1 hour	75 ppb (196 µg/m3)	--
	3 hour	--	0.5 ppm (1300 µg/m3)
	24 hour	0.14 ppm (for certain areas)	--
	Annual	0.03 ppm (for certain areas)	--
Lead (Pb)	30 day average	--	--
	Calendar quarter	1.5 µg/m3 (for certain areas)	1.5 µg/m3 (for certain areas)
	Rolling 3-month average	0.15 µg/m3	0.15 µg/m3

Source: CARB 2016

Notes: ppb = parts per billion; ppm = parts per million; µg/m3 = micrograms per cubic meter; mg/m3 = milligrams per cubic meter; – = no standard exists

According to USEPA's General Conformity Rule (40 CFR Part 51, Subpart W), any proposed federal action with the potential to cause violations in a NAAQS in a nonattainment or maintenance area must undergo a site-specific conformity analysis to determine if de minimis thresholds could be exceeded. For projects not within nonattainment or maintenance areas an analysis is conducted to determine if net annual emissions from a proposed management action or project are likely to remain below applicable de minimis thresholds. If the project is not expected to exceed any limits, Army guidance requires the preparation of a Record of Non-Applicability for CAA conformity if no CAA Conformity Determination to formally document consideration of air resources. However, if it is possible that de minimis thresholds could be exceeded a CAA Conformity Determination is required to ascertain if emissions coincide with the approved State Implementation Plan (SIP). Failure to conform to the SIP would exclude a proposed project site from further consideration.

In addition to the criteria pollutants, USEPA regulates listed hazardous air pollutants (HAP). USEPA has established National Emission Standards for Hazardous Air Pollutants (NESHAP) and regulates emissions of listed HAPs using source categories that must meet maximum achievable control technology standards to demonstrate compliance.

3.2.2 State and Local Regulations

Since the CAA is a delegated law, local air quality control boards are empowered to set standards more stringent than Federal levels and the law is implemented via these regional air quality control boards. The California Air Resources Board (CARB) and Monterey Bay Air Resources District (MBARD) are the state and local agencies responsible for air quality management in the Proposed Action area, and have primary responsibility for the implementation of NAAQS. CARB and MBARD have adopted rules and regulations to reduce emissions throughout the region.

The California Clean Air Act establishes air quality management standards similar to those used by the federal CAA, but with a focus on California Ambient Air Quality Standards (CAAQS). For select pollutants and averaging periods, the state standards are more rigorous than the national standards. The Global Warming Solutions Act of 2006, California Assembly Bill (AB) 32, codified the state's GHG emissions targets established by California EO S-3-05 (June 1, 2005).

Since the Presidio of Monterey is subject to MBARD permit and rule requirements, MBARD air quality guidelines are used in this analysis (MBUAPCD, 2008).The guidelines provide the following:

- Criteria and thresholds for determining if a significant adverse effect on air quality will result from implementation of a project
- Procedures and modeling protocols for quantifying and analyzing effects on air quality
- Mitigation methods for impacts to air quality

Specific rules applicable to the project may include but are not limited to:

- Rule 424, National Emission Standards for Hazardous Air Pollutants
- Rule 439, Building Removals

In 2017, an updated Air Quality Management Plan (AQMP) was adopted by MBARD to support attainment of CAAQS as required by the Clean Air Act (MBARD, 2017).

3.3 BIOLOGICAL RESOURCES (SENSITIVE VEGETATION COMMUNITIES AND SPECIAL STATUS SPECIES)

For the purpose of this Draft EA, special status species include plants and animals that are listed, proposed for listing, or candidates as threatened or endangered, and/or listed as a species of concern by the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS) under the federal Endangered Species Act (ESA). Species identified by the U.S. Army as species at risk (SAR) which are critically imperiled or imperiled across their range according to NatureServe conservation rank

are also provided management consideration on Department of Defense (DoD) lands including the Presidio of Monterey.

3.3.1 Endangered Species Act

The purpose of the ESA is to protect and recover imperiled species and the ecosystems on which they depend. The USFWS and NMFS share responsibility for implementing the ESA (16 U.S.C. § 153 et seq.). USFWS maintains jurisdiction over terrestrial and freshwater species, while the NMFS implements the ESA for marine and anadromous species. To protect imperiled species the ESA prohibits the "take" of any protected species, defined as any action which may harass, harm (including habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Species which are federally listed as threatened or endangered merit full protection from take under the ESA. While proposed or candidate species do not have the full protection of ESA, the USFWS and NMFS advise project applicants that these species could be elevated to listed status at any time, therefore these species are also considered in this Draft EA. Measures to avoid or mitigate impacts to the species are delineated in the issued Biological Opinion (BO) or concurrence letter.

In 2013, the U.S. Army at the Presidio initiated formal consultation in accordance with Section 7 of ESA, and obtained USFWS BO 8-8-13-F-29 (USFWS, 2013) for the Real Property Master Plan. This 2013 BO specifically addresses the Master Plan's effects on the federally endangered Yadon's piperia. The Master Plan included small construction projects and maintenance and repair of existing facilities on the Presidio, specifically including enlarging and/or improving a parking lot. As this project is specifically covered under the 2013 BO and occurs in a highly developed area described in the BO, this project is bound to the terms and conditions outlined therein. The conditions of this BO include avoidance and minimization measures, establishment of conservation areas, and relocation of individual plants. Further discussion of these measures is included in Section 2.1.6. The Proposed Action would be conducted under the 2013 BO, and is therefore subject to these conditions. The Proposed Action is not subject to reinitiation of consultation as the action is not different from what was considered in the opinion and no new species have been listed in the area since the opinion was issued. Surveys will be conducted prior to ground disturbing actions to ensure conditions have not changed significantly, or new species have not appeared. The Monarch butterfly is currently listed as under review with a determination due in December of 2020.

3.3.2 Migratory Bird Treaty Act

The USFWS implements the Migratory Bird Treaty Act (MBTA) (16 United States Code [U.S.C.] Section 703-711). Pursuant to the MBTA it is illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, any migratory bird, or the parts (including feathers), nests, or eggs of such a bird except under the terms of a valid Federal permit. Legitimate activities which may have an impact to species protected under this act are required to confer with USFWS to ensure that such activities are carried out in a manner that safeguards wildlife.

3.3.3 Bald and Golden Eagle Protection Act

Protection of Bald and Golden eagles is provided under the Bald and Golden Eagle Protection Act (16 U.S.C. Section 668) which is under the authority of USFWS. Under

the Bald and Golden Eagle Protection Act “take” of bald or golden eagles, including their parts, nests or eggs, without a permit issued by the Secretary of the Interior, is prohibited and punishable by criminal penalties. Further, it is prohibited to “disturb” an eagle which is defined as “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior. "Permits for “take” or possession under this act are typically only granted for scientific, exhibition, or Native American religious purposes.

3.3.4 Executive Order 13751, Invasive Species

Enacted in 2016, EO 13751 amends EO 13112 and directs executive departments and agencies to implement steps to prevent the introduction and spread of invasive species, and to eradicate and control populations of established invasive species.

3.3.5 Executive Order 11990 (1977) Protection of Wetlands

The purpose of EO 11990 is to “minimize the destruction, loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands.” To achieve this aim, Federal agencies are mandated to consider alternatives to wetland sites and limit potential damage if a planned activity may impact a wetland.

3.4 CULTURAL RESOURCES

Cultural resources can be defined as any physical evidence or place of past human activity including the built environment such as sites, structures, objects; but also include landscapes or natural features which have significance to a group of people traditionally associated with it or containing evidence of past human activity. These areas may be designated as historic and protected by federal, state, and/or local laws.

Projects that involve federal funding or permitting must comply with the provisions of the National Historic Protection Act of 1966 (NHPA), as amended (54 U.S.C. 306108). Cultural resources are considered during federal undertakings chiefly under Section 106 of the NHPA through one of its implementing regulations, 36 CFR 800 (Protection of Historic Properties). Properties of traditional religious and cultural importance to Native Americans are considered under Section 101(d)(6)(A) of the NHPA. Other relevant federal laws include the , American Indian Religious Freedom Act of 1978, Archaeological Resources Protection Act of 1979, and Native American Graves Protection and Repatriation Act of 1989.

3.4.1 National Historic Preservation Act of 1966 (54 U.S.C. §§ 300101 Et Seq.)

NHPA is a Federal Act affirming the National interest of preserving National heritage for future generations by harmonizing the requirements of present and future generations and creating a culture of stewardship over historic resources. Public and private entities are thereby encouraged to work in partnership to preserve historic and prehistoric resources and to utilize all usable elements of the Nation’s historic built environment.

Under Section 106 (16 U.S.C. 470f) of the NHPA, Federal agencies having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking shall take

into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. While the Advisory Council on Historic Preservation previously declined to participate in consultation in a letter dated 27 December 2013, the Federal agency shall afford the ACHP a reasonable opportunity to comment with regard to such undertaking.

3.4.2 National Register of Historic Places

For a resource to qualify for listing in the NRHP, the resources must be deemed worthy of preservation due to its national significance in American history, architecture, archaeology, engineering, and culture. For a resource to qualify for listing in the California Register of Historic Resources (CRHR), or as a locally significant resource, it must be deemed worthy of preservation due to its significance to California history, architecture, archeology, engineering, and culture.

The U.S. Secretary of the Interior is responsible for establishing professional standards and providing guidance related to the preservation and protection of all cultural resources listed in or eligible for listing in the NRHP.

3.4.3 Archeological Resources Protection Act (16 U.S.C. 470 § et. Seq.)

The purpose of the Archeological Resources Protection Act is to prevent the loss and destruction of any material remains of past human life or activities which are of recognized archeological interest for the present and future benefit of the American people. Materials protected must be at least 100 years in age.

3.4.4 Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. §3001-3013)

The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) mandates that Federal agencies in possession of human remains, funerary objects, sacred objects, and objects of cultural patrimony consult with Native American lineal descendants, Indian tribes, and Native Hawaiian organizations on the disposition or repatriation of cultural items. Additionally, NAGPRA requires that Indian tribes or Native Hawaiian organizations be immediately notified and consulted whenever ground disturbing excavations may unexpectedly encounter Native American cultural items, or when Native American cultural items are inadvertently discovered during an undertaking.

3.4.5 American Indian Religious Freedom Act of 1978 (42 U.S.C. §§ 1996 and 1996a)

The American Indian Religious Freedom Act of 1978 (AIRFA) protects the traditional religious practices and beliefs, sacred sites, and the use of sacred objects by ensuring access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites.

3.4.6 Paleontological Resources Preservation Act of 2009

The Paleontological Resources Preservation Act directs the U.S. Secretary of the Interior or the U.S. Secretary of Agriculture to manage and protect paleontological resources on federal land, and to develop plans to inventory, monitor, and derive the scientific and educational use of such resources. It prohibits the removal of paleontological resources from federal land without a permit.

3.5 GEOLOGY AND SOILS

Geological resources are defined as the topography, geology, and geological hazards of a given area. Topography typically describes the elevation, slope, aspect, and surface features found in a given area. The geology of an area includes bedrock materials, mineral deposits, soils, paleontological resources, and unique geological features. The value of soil as a geologic resource lies in its potential to support plant growth, especially agriculture. Mineral resources are metallic or non-metallic earth materials that can be extracted for a useful purpose, such as iron ore that can be refined to make steel or gravel that can be used to build roads. The principal geologic hazards influencing the stability of structures are soil stability and seismic activity.

3.6 HAZARDS AND HAZARDOUS MATERIALS

Hazardous materials include all chemicals listed by the USEPA under the Superfund Amendments and Reauthorization Act of 1986 (40 CFR §355 et seq.). Regulation of hazardous materials and treatment and disposal of hazardous and toxic wastes is designed to protect human health and the environment.

The U.S. Army guidance outlines procedures to facilitate early identification and appropriate consideration of Hazardous, Toxic, and Radioactive Waste (HTRW) problems. When problems are identified, response actions must be acceptable to the USEPA and applicable state regulatory agencies. The lead state regulatory agency in the environmental restoration program for the Presidio is the CCRWQCB, and the Department of Toxic Substances Control, agencies that are under the California Environmental Protection Agency (CalEPA). Locally, the lead regulatory agency for hazardous waste management is the Monterey County Department of Health, Environmental Health Division.

3.6.1 Hazardous Materials Releases

The CERCLA of 1980 (42 U.S.C. 9601 et seq.) regulates hazardous materials releases into the environment that occurred before 1986. Along with the Superfund Amendments and Reauthorization Act of 1986, it establishes the Superfund Program to clean up hazardous waste sites. The DoD’s implementing program for Superfund is the Installation Restoration Program (IRP) and is limited to cleanups in the United States.

The IRP is a comprehensive program designed to address contamination from past activities and restore Army lands to usable conditions. The IRP requires the Army to identify, investigate, and clean up hazardous substances, pollutants, and contaminants that pose environmental health and safety risks at active military installations and formerly used defense sites. All IRP sites on the Presidio have been cleaned up with the exception of a closed landfill that has been capped to prevent exposure to the underlying soil. The cap is currently functioning as designed and the Proposed Action would have no impact on the functioning of the landfill cap.

3.6.2 Toxic Substances

The Toxic Substances Control Act of 1976 (15 U.S.C. 2601 et seq.) places restrictions on certain chemical substances, such as chlorofluorocarbons (CFC), polychlorinated biphenyls (PCB), and asbestos. The law imposes restrictions to protect human health

and environmental exposure to these highly toxic substances, requires chemical testing, and regulates the release of these chemicals into the environment.

3.6.3 Hazardous Waste

The Resource Conservation and Recovery Act (RCRA) of 1976, with amendments, establishes regulations to characterize hazardous waste and requirements for transporting, storing, and disposing of hazardous waste. RCRA places “cradle to grave” responsibility for hazardous waste on the generator of the waste. RCRA also covers universal wastes, which are hazardous wastes that are more common and pose a lower risk to people and the environment than other hazardous wastes. Examples of common hazardous wastes are florescent lighting tubes that may contain mercury and potential PCBs found in florescent light fixture ballasts. Federal and state regulations identify universal wastes and provide rules for handling, recycling, and disposing of them (40 CFR Part 273; 22 CCR 66273.1 et seq.). All universal wastes are hazardous wastes, but they are managed under less stringent standards than other hazardous wastes.

3.6.4 Hazard Materials Transportation

The Federal Hazardous Materials Transportation Law of 1988 (49 U.S.C. 100 et seq.), as amended, authorizes the U.S. Department of Transportation to issue interstate and intrastate regulations regarding the transportation of hazardous materials and wastes on public roads. These include packaging, handling, labeling, making, placarding, and transporting.

3.6.5 Lead-based Paint

Federal, state, and local regulations regulate the management of lead-based paint (LBP) and its associated additives and hazards. U.S. Army policy is to manage LBP in place, unless it presents an imminent health threat, as determined by the installation medical officer, or if operational, economic, or regulatory requirements dictate its removal. U.S. Army policy also imposes requirements to reduce the release of lead, lead dust, or LBP into the environment from deteriorating paint surfaces, building maintenance, or other sources on U.S. Army installations or on U.S. Army-controlled property (Presidio, 2013a).

Wastes undergo characterization to determine if they are classifiable under applicable regulations as hazardous, special, or solid. The U.S. Department of Defense developed guidelines for residential property and LBP requirements (Presidio, 2013a) that primarily address the requirements of Title X, the Residential Lead-based Paint Hazard Reduction Act, a portion of the Housing and Community Development Act of 1992. This guide addresses housing built before 1960 and between 1960 and 1978, child-occupied facilities, and other target housing.

The Presidio has developed the LBP Hazard Management Plan to prevent human exposure to lead hazards through proactive policies that comply with all applicable laws and regulations. The LBP Hazard Management Plan applies to lead-containing paint present in housing and non-housing buildings (Presidio, 2013a).

3.6.6 Asbestos

The federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations establish performance standards for the demolition and renovation of

buildings with asbestos-containing material (ACM) (40 CFR Part 61). Federal, state, and local MBARD rules and policies prefer not disturbing potentially friable ACM, which when dry can be crumbled, pulverized, or reduced to power by hand pressure, and provide removal standards for renovation and demolition projects. During demolition, maintenance, repair, remediation, or renovation of buildings, friable asbestos in ACM can be released into the air. Asbestos fibers can also be released from various building materials, such as pipe and boiler wrap and other insulating materials and acoustic ceiling tiles (Presidio, 2013a). The installation has developed an Asbestos Management Plan to prevent human exposure to asbestos hazards through the implementation of proactive policies that comply with all applicable laws and regulations (Presidio, 2013a).

3.6.7 Radon

No federal regulations require radon testing, but California law requires radon testing and mitigation plans for new construction. The effects of human exposure to radon are uncertain primarily because it is difficult to isolate the effects from particular radiation sources. The widely accepted theory called the linear no-threshold hypothesis states that the effects of radiation can occur at any dose, no matter how small. According to this theory, there is no level of exposure below which adverse effects do not occur. If the theory is correct, all exposure to radiation presents some health risk. The risk of lung cancer caused by exposure to radon through its inhalation is currently a topic of concern.

The U.S. Army has implemented a Radon Reduction Program to determine and control the levels of radon exposure to military personnel and their dependents. According to the Presidio Real Property Master Plan Final EIS (2013), the U.S. Army has completed testing of most of its facilities as part of this program.

U.S. Army policy provides for ongoing radon management efforts. In accordance with Army Regulation 200-1, the U.S. Army maintains and updates records of completed radon assessments and includes radon testing results with real property and housing data to notify tenants and transferees of elevated radon levels. U.S. Army policy provides that indoor radon levels in newly constructed units, units converted to housing, and continuously occupied structures, such as hospitals, located in high-level radon areas are to be tested prior to occupancy. Where elevated levels of radon are encountered, U.S. Army facilities managers are to adhere to abatement measures.

3.6.8 Public Health and Safety- General

This section describes existing public health and safety concerns with regard to wildfires or other safety hazards, high volume of pedestrian and motor vehicle interface, unexploded ordnances, emergency services, and emergency evacuation routes.

The Army Safety Program, Army Regulation 385-10 (U.S. Army, 2014), governs U.S. Army policies, responsibilities, and procedures to protect and preserve U.S. Army personnel and property against accidental loss. The regulation provides for operational safety and safe and healthy work places, and ensures compliance with applicable safety laws and regulations.

Workplace safety applies to on-the-job safety and implements the requirements of 29 CFR Part 1920 et seq. (Occupational Safety and Health Standards). These

requirements include the use of protective clothing and equipment, hazard materials communication, health and safety standards for the workplace, on-the-job reporting requirements, and myriad others designed to protect the health and safety of workers.

The Garrison commander is charged with ensuring the health and safety of the people living and working on the Presidio Installation.

3.7 LAND USE

Generally defined, land use describes the physical use of land. Lands at the Presidio are improved, semi-improved, and unimproved. The improved and semi-improved land uses describe the developed portions of the installation, and the unimproved land uses refer primarily to undeveloped open spaces.

Situated on a sloping hillside above the City of Monterey, the Presidio ranges in elevation from approximately 770 feet above sea level at its highest point in the western part of the installation (commonly referred to as “upper” Presidio), to approximately 30 feet above sea level at its lowest elevation to the east (commonly referred to as “lower” Presidio). In general, land in the lower portion of the Presidio is considered improved and semi-improved, and land in the upper portion is considered semi-improved and unimproved. Improved grounds include roads, structures, buildings, fields and recreational areas, parking lots, and other fully maintained areas. The central and eastern portions of the Presidio, below the 450-foot elevation contour and commonly known as the middle and lower Presidio, are the most heavily developed and are considered improved grounds. Buildings on the middle and lower Presidio provide classrooms and administrative and support functions for the base mission. The lower Presidio is in the Presidio Historic District and a portion of the lower Presidio is leased to the City of Monterey as part of an historic park.

The unimproved upper portion of the Presidio, known as the Huckleberry Hill Nature Preserve, is designated Community under the U.S. Army Land Use Categories. The City of Monterey currently leases and manages the nature preserve with the goal of retaining the forest while providing a recreation area for residents to enjoy for future generations. The City of Monterey also is permitted to use Soldier Field including adjacent baseball fields, located in the lower Presidio, and operates it for recreational use.

The City of Monterey is currently implementing improvements to the Lower Presidio Historic Park per the 2002 Master Plan. The Lower Presidio Historic Park is envisioned as a multicultural interpretive space that will create new opportunities to communicate a spectrum of archaeological and cultural histories.

Existing U.S. Army land use categories on the Presidio include the following:

- Campus/Flex Use – Includes areas used for educational and nonindustrial support activities
- Community – Includes the natural resource conservation areas; the cemetery; and areas for recreational, medical, and commercial activities
- Housing – Includes on-post accompanied personnel housing

- Barracks – Includes on-post, unaccompanied personnel housing with related support facilities and activities
- Leased Land – Currently leased areas including the Huckleberry Hill Nature Preserve, Lower Presidio Historic Park, and Building 566 and the surrounding area.
- Protected Space – Areas having limited potential for development and designated as permanent open space due to sensitive biological or cultural resources
- Open Space – Areas having limited potential for development and designated as permanent open space.

The Presidio has a mix of land uses, a situation common on most U.S. Army posts. Areas adjacent to the Presidio are under the jurisdictions of the cities of Monterey and Pacific Grove, and are zoned for low-density and medium-density residential use (City of Monterey, 2005 [2016a], City of Pacific Grove, 1994).

3.7.1 Coastal Zone Management Act

The CZMA of 1972 created a federal and state partnership for management of coastal resources, where states were encouraged to develop their own Coastal Zone Management Program (CZMP) in order "to preserve, protect, develop and, where possible, to restore or enhance the resources of the Nation's coastal zone…" In 1972 the California Coastal Commission (CCC) was established by voter initiative and in 1976 California adopted the California Coastal Act (CCA). In 1977, the federal government certified the California Coastal Management Program (CCMP). The CCMP required each local coastal jurisdiction to prepare a local coastal program that includes a land use plan and an implementation program. In the 1980s, the City of Monterey divided its coastal planning area into five subareas – Cannery Row, Harbor, Del Monte Beach, Skyline, and Laguna Grande. Land use plans were prepared for these areas. The Lower Presidio is located within the Harbor Coastal Zone planning area and the Upper Presidio within the Skyline Land Use planning area.

Per the CZMA section 304(1), federal lands are excluded from the coastal zone. However, federally conducted activities on excluded lands that have 'spillover effects' on lands, water use, or natural resources of the coastal zone, must be reviewed for consistency with the approved state CZMP. National Oceanic and Atmospheric Administration's (NOAA) regulations establish the requirements for consistency determinations.

The Proposed Action is not located within the coastal zone and is not anticipated to have any direct or spillover effects on the coastal zone, with implantation of proposed mitigation measures, as discussed in Land Use and Planning, Table 4.2.

3.8 NOISE

Noise or "unwanted sound" can be intermittent or continuous, steady or impulsive, stationary or transient. Noise emanates from vehicular traffic and from project sites during construction. Ambient noise, or the existing background noise environment, can be generated by a number of noise sources, including mobile sources such as automobiles and trucks and stationary sources such as machinery, or industrial

operations. In addition, there is an existing and variable level of natural ambient noise from sources such as wind, streams and rivers, wildlife, and other sources.

Humans or wildlife can be affected by noise either interfering with normal activities or diminishing the quality of the environment. The impact of noise greatly depends upon its characteristics (e.g., loudness, pitch, time of day, and duration) and the sensitivity or perception of the noise receptor. Noise levels heard by humans or wildlife depend on variables such as distance, percentage, and type of ground cover, and objects or barriers between the noise source and the receiver, as well as the atmospheric conditions.

Many factors affect the perception of noise, including pitch, loudness, and the character of the noise. The standard unit of sound amplitude measurement is the decibel (dB). Because the human ear cannot hear all frequencies, a special scale, the A-weighted decibel (dBA) scale, has been devised to relate noise to human sensitivity. The dBA scale de-emphasizes the low- and high-end frequencies and emphasizes those frequencies the human ear is able to hear. Noise levels for typical human activities are shown in Table 3-2 below.

Table 3-2 Typical Noise Levels

Activity or Occurrence	Noise Level (dBA at 3 ft)
Lowest threshold of human hearing	0
Quiet Urban nighttime	40
Quiet Urban daytime	55
Normal Conversation	60
Heavy Traffic (at 300ft)	60

Source: FHWA Noise Handbook, 2017

Noise is typically analyzed based on the following terms:

- L_{eq} – Equivalent energy level. The A-weighted sound level corresponding to a steady state sound level containing the same total energy as a time varying signal over a given sample period. L_{eq} is typically computed over 1-, 8-, and 24-hour measurement periods
- L_{max} – The maximum A-weighted sound level during the measurement period
- L_{dn} – Day-night average level. A 24-hour average L_{eq}, with the addition of 10 dBA to the sound level during the hours of 10:00 P.M. to 7:00 A.M., to account for greater noise sensitivity of people at night
- CNEL – Community Noise Equivalent Level. A 24-hour average L_{eq}, with the addition of 5 dBA to sound levels from 7:00 P.M. to 10:00 P.M. and the addition of 10 dBA to sound levels from 10:00 P.M. to 7:00 A.M. CNEL is widely used in California and is similar to L_{dn}, except it increases noise levels by 5 dBA between 7:00 P.M. and 10:00 P.M.

Sound traveling over a distance can be affected by many factors. Temperature, humidity, wind direction, barriers such as walls, forests, hills, and absorbent materials, such as soft ground and light snow, are all factors in how sound is perceived at different distances. Noise attenuates from the divergence of sound waves with distance. In general, this mechanism results in a 6-dBA decrease in the sound level with every doubling of distance from a point source.

3.8.1 Noise Control Act

The Noise Control Act of 1972 (Public Law 92-574) establishes a national policy to promote an environment for all Americans that is free from noise that would jeopardize their health and welfare. The act authorized and directed federal agencies to carry out programs to further the policy declared in the Act. Each federal department or agency must comply with federal, state, interstate, and local requirements regarding control and abatement of environmental noise.

To comply with the Noise Control Act, the U.S. Army has established a noise policy as part of Army Regulation 200-1. The major goals of the Army's noise policy are to:

- Control operational noise to protect the health and welfare of people, on- and off-post, affected by all U.S. Army-produced noise, including on- and off-post noise sources,
- Reduce community annoyance from operational noise to the extent feasible, consistent with U.S. Army training and material testing mission requirements, and
- Actively engage local communities in land use planning in areas subject to high levels of operational noise and a high potential for noise complaints.

The U.S. Army's noise policy establishes noise criteria for land use compatibility planning that are specific to aviation sources, impulsive military sources such as artillery, and small arms firing ranges. None of these categories of noise directly applicable to the types of noise sources associated with the Presidio, which are primarily related to construction and ground-based transportation. The Army's operational noise policy states, "Transportation and industrial noise will be assessed on a case by case basis using appropriate noise metrics, including U.S. Department of Transportation guidelines."

3.8.2 City of Monterey Noise Ordinance

The City of Monterey noise regulations consist of a set of noise performance standards that apply to all land use classifications in all zoning districts. All uses and activities shall comply with the provisions of the Monterey Noise Regulations (Section38-111). Decibel levels shall be compatible with neighboring uses and no use shall create ambient noise levels, which exceed the noise standards shown in Table 3-3.

Table 3-3 City of Monterey Maximum Noise Level Standard by Land Use

Zone of Property Receiving Noise	Maximum Decibel Noise Level (dBA)
Open Space District	60
Residential District	60
Public and Semi-public District	60
Commercial District	65
Industrial District	70
Planned Development	Study Required

Source: Monterey City Municipal Code Section 38-111

Duration and Timing

The noise standards shall be modified as follows to account for the effects of time and duration on the effect of noise levels:

- In residential districts, the noise standard shall be 5 dBA lower between 10:00 P.M. and 7:00 A.M.
- Noise that is produced for no more than a cumulative period of five minutes in any hour may exceed the standards above by 5 dB.
- Noise that is produced for no more than a cumulative period of one minute in any hour may exceed the standards above by 10 dB.

3.9 UTILITIES AND SERVICE SYSTEMS

Utilities for the purpose of this analysis includes existing regulations governing wastewater, stormwater, and solid waste on the Presidio Installation.

3.9.1 Wastewater and Stormwater

The federal Water Pollution Control Act (Public Law 92-500) or CWA was promulgated in 1972 following a series of legislative efforts to establish water pollution control laws in the CWA Section 402, NPDES Permit Program, authorizes the issuance of individual or general permits to control municipal and industrial point source discharges, including those from wastewater and stormwater. The federal government has full authority to issue NPDES permits but may delegate the permit program to the state. California has the authority to issue NPDES permits.

The Strategic Plan Update 2008-2012 for the SWRCB includes a priority to increase sustainable local water supplies available for meeting existing and future beneficial uses by one million acre feet per year (afy) by 2020 and by at least two million afy, in excess of 2002 levels. The Health and Safety Code, the Water Code, and Title 22 and Title 17 of the California Code of Regulations (CCR) contain regulations for the treatment, use, and distribution of reclaimed water.

California's primary statute governing wastewater is the Porter-Cologne Act with numerous amendments and additions since initial adoption. The Porter-Cologne Act

grants the SWRCB and nine California Regional Water Quality Control Boards (RWQCB) power to protect water quality. The Act is the primary vehicle for implementation of California's responsibilities under the federal CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs authority and responsibility to adopt plans and policies, regulate discharges to surface and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants.

3.9.2 Solid Waste

The USEPA regulates the management of non-hazardous solid waste according to RCRA, Subtitle D. Under RCRA, the USEPA is also in charge of regulating the handling and disposal of hazardous wastes.

Under the jurisdiction of the CalEPA, the California Integrated Waste Management Board (CIWMB) is charged with managing solid waste. Title 14, Chapter 3, of the CCR addresses minimum standards for solid waste handling and disposal (CIWMB, 2008).

The California Integrated Waste Management Act of 1989 (AB 939) required diversion of 50 percent of all solid waste from landfill disposal or transformation by January 1, 2000, through source reduction, recycling, and composing activities. AB 341 updates this policy goal of not less than 75 percent diversion by 2020.

3.10 WATER RESOURCES

Water resources as defined in this assessment are sources of water available for use by humans, flora, or fauna, including surface water, groundwater, nearshore waters, wetlands, and floodplains. Surface water resources, including but not limited to, stormwater, lakes, streams, rivers, and wetlands, are important for economic, ecological, recreational, and human health reasons. Groundwater is classified as any source of water beneath the ground surface and may be used for potable water, agricultural irrigation, and industrial applications. Near-shore waters can be directly affected by human activity, and are important for human recreation and subsistence. Wetlands are habitats that are subject to permanent or periodic inundation or prolonged soil saturation, and include marshes, swamps, and similar areas. Areas described and mapped as wetland communities may contain small streams or shallow ponds, or pond/lake edges. Water quality describes the chemical and physical composition of water as affected by natural conditions and human activities. Floodplains are relatively flat areas adjacent to rivers, streams, watercourses, bays, or other bodies of water subject to inundations during flood events.

3.10.1 Clean Water Act

The federal CWA includes provisions for improving surface water and stormwater quality. Under the CWA, discharge of pollutants from point sources or non-point sources such as construction sites into navigable waters is prohibited unless the discharges are in compliance with an NPDES permit. The permitting process in California is described below under California Stormwater Permitting.

3.10.2 Safe Drinking Water Act

Enacted in 1974, the Safe Drinking Water Act gave the USEPA the authority to establish drinking water regulations to protect human health from contaminants in the nation's drinking water supply (Title XIV Part B). As a result, the USEPA set primary health-based and secondary aesthetic-based drinking water standards. The primary drinking water standards are contaminant-specific standards and known as Maximum Contaminant Levels. They are enforceable at the federal level. Secondary standards are non-enforceable guidelines for contaminants that may cause cosmetic or aesthetic effects, such as taste or color.

3.10.3 Energy Independence and Security Act

Title IV, Subtitle C, Sections 431 through 437 of EISA (2007) contains goals and requirements for implementation of water conservation technologies that are life-cycle cost-effective. High-performance green building credit is given for promoting efficient and sustainable use of water.

3.10.4 National Marine Sanctuary Act

The Marine Protection, Research, and Sanctuaries Act of 1972, as amended, also known as the National Marine Sanctuaries Act, established the National Marine Sanctuary program to identify, designate, and manage areas of the marine environment of special national, and in some cases international, significance due to their conservation, recreational, ecological, historical, research, educational, or aesthetic qualities. The Monterey Bay National Marine Sanctuary consists of approximately 4,016 square nautical miles of coastal and ocean waters, and submerged land thereunder, in and surrounding Monterey Bay off the central coast of California. The Davidson Seamount Management Zone is also part of the sanctuary. All Department of Defense activities must be carried out in a manner that avoids to the maximum extent practicable any adverse impacts to sanctuary resources and qualities.

3.10.5 Porter-Cologne Water Quality Control Act

California's Porter-Cologne Water Quality Control Act granted statutory authority to the SWRCB and the nine RWQCBs operating under the SWRCB. Per the California Water Code, the SWRCB regulates statewide water quality standards programs and is responsible for the allocation and determination of surface water rights. The Monterey Bay area is under the jurisdiction of the CCRWQCB, which has the authority to implement water quality protection standards by issuing permits for discharges to waters in its jurisdiction. Water quality objectives for receiving waters in Monterey County are specified in the Basin Plan prepared by the CCRWQCB in compliance with the federal CWA and the state Porter-Cologne Act.

3.10.6 Title 22 California Code of Regulations

The California Department of Public Health's recycled water regulations set standards for use of recycled water, including use of recycled water for irrigation, flushing toilets and urinals, among other uses, as given below. The State of California's published codes should be referenced for official and most current standards.

3.10.7 National Sanitation Foundation/American National Standards Institutes (NSF/ANSI-350)

The NSF/ANSI-350 standards was established to set clear, rigid, yet realistic guidelines for water reuse treatment systems. NSF/ANSI-350 sets forth is a comprehensive method of evaluation and effluent quality criteria that has national level recognition (through the American National Standards Institute). NSF/ANSI-350 covers systems that treat greywater (bathing, laundry, etc.) and calls for a high level of water quality testing independent of the treatment methodology used. NSF/ANSI publications should be referenced for official and most current standards.

3.10.8 Sustainable Groundwater Management Act

In September 2014, California Governor Jerry Brown signed a three-bill package known as the Sustainable Groundwater Management Act (SGMA) into law. SGMA establishes a framework for local groundwater management and requires local agencies to bring overdrafted basins into balanced levels of pumping and recharge.

The California Statewide Groundwater Elevation Model (CASGEM) Priority List ranks groundwater basins across the state with assessment rankings of High, Medium, Low, or Very Low. In unmanaged groundwater basins, SGMA requires the formation of locally-controlled Groundwater Sustainability Agencies (GSA). GSAs are responsible for developing and implementing Groundwater Sustainability Plans (GSP) to guide groundwater management decisions and ensure long-term sustainability in their basins. In adjudicated basins, but the court-identified watermaster serves the purpose of the GSA, and the adjudication Judgment serves as the GSP. The Seaside Area Groundwater Subbasin, from which CalAm obtains a portion of its water supply, is an adjudicated basin (Seaside Basin Watermaster, 2016).

3.10.9 California Stormwater Permitting

In California, the Stormwater Construction General Permit authorizes discharges of stormwater associated with construction activities that are in compliance with all requirements and conditions of the Stormwater Construction General Permit. All discharges are prohibited except stormwater and non-stormwater discharges specifically authorized in the General Permit. For each Construction Project that disturbs one acre or more, permit registration documents would be prepared and submitted to the SWRCB and would include a Notice of Intent, risk assessment, site map, SWPPP, a signed certification statement, and payment of fees.

The California Stormwater General Permit is a risk-based permit that establishes three levels of risk possible for a construction site. Risk is calculated in two parts: (1) project sediment risk, and (2) receiving water risk. The findings of the risk assessment would determine the potential pollutant hazards associated with the site (i.e., Risk Level 1, 2, or 3) and establish the specific compliance conditions and requirements of the permit. A SWPPP must be developed prior to construction to address the control of pollutant discharges using BMPs. It must also provide steps to monitor the Construction Project with visual and weekly pre- and post-rain event monitoring. Numerical limits (“action levels”) for pollutants in stormwater samples from construction sites would be monitored based on the risk level determined by the risk assessment. Following the completion of the project construction, the site must meet the conditions for Termination of Coverage

through a certification process that ensures the site is stabilized and there is no potential for post-construction-related stormwater discharges.

On September 2, 2012, new post-construction standards went into effect, and post-construction and long-term maintenance plans must be developed (SWRCB Order No. 2012-0006-DWQ; NPDES No. CAS000002) for construction projects on the Presidio. The post-construction standards require dischargers to comply with permit runoff reduction requirements by demonstrating non-structural and structural controls that replicate the pre-project water balance.

In addition to the NPDES Construction General Permit for projects that disturb one or more acres, the Presidio is covered under NPDES General Permit No. CAS000004 (Water Quality Order No. 2013-001-DWQ), Waste Discharge Requirements for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4). This permit prohibits non-stormwater discharges to the municipal stormwater system. The permit requires permittees to develop, implement, and enforce a program to prevent construction site discharges of pollutants and impacts on beneficial uses of receiving waters. The program shall include the development of an enforceable construction site storm water runoff control ordinance for all projects that disturb less than one acre of soil. The construction site storm water runoff control ordinance shall include, at a minimum, requirements for erosion and sediment controls, soil stabilization, dewatering, source controls, pollution prevention measures and prohibited discharges.

The NPDES Small MS4 General Permit also requires permittees to manage post-construction stormwater. The management program shall include site design measures, source control measures, LID design standards, and hydromodification measures. The site design measures may include stream setbacks and buffers, soil quality improvement and maintenance, tree planting and preservation, rooftop and impervious area disconnection, porous pavement, green roofs, vegetated swales, or rain barrels and cisterns. Source control measures may include controlling or eliminating pollutant discharges from accidental spills or leaks, interior floor drains, parking and storage areas, outdoor pesticide use, pools, spas, ponds, and other water features, food service operations, refuse areas, fuel dispensing areas, or non-storm water discharges. LID design standards include a site assessment to determine areas most suitable for development and areas to be left undisturbed, to preserve areas that can promote infiltration, to limit overall impervious coverage of the site, to set back development from creeks, wetlands, and riparian habitats, to preserve significant trees, to conform the site layout along natural landforms, to avoid excessive grading and disturbance of vegetation and soils, to replicate the site's natural drainage patterns, and to detain and retain runoff throughout the site. The hydromodification measures require that projects that create and/or replace one acre or more of impervious surface shall limit post-project runoff to the pre-project flow rate for the 2-year, 24-hour storm.

3.10.10 State Water Resources Control Board Order No. 95-10

The SWRCB adopted Order No. 95-10, Order on Four Complaints Filed Against the California-American Water Company, Carmel River, Monterey County, in 1995 to address complaints of over-pumping of the Carmel Valley Groundwater Basin

(Department of Water Resources [DWR] Basin #3-7). SWRCB Order No. 95-10 was filed against CalAm, which supplies water to the Monterey Peninsula, including the Presidio, for unauthorized diversion of water from the Carmel River in Monterey County. The Order stated that CalAm was diverting 10,730 afy from the Carmel River without a valid water right and needed to reduce its pumping by that amount. CalAm was thus forced to find an alternate water source to replace approximately 75 percent of its annual supply. CalAm has implemented water conservation measures to reduce demand and has increased its pumping from the nearby Seaside Area Subbasin to supplement its water supply. However, the Seaside Area Subbasin has since been adjudicated and pumping from the aquifer is restricted. CalAm operated in the Monterey district under the terms of SWRCB Order No. 95-10 from July 1995 to October 20, 2009.

3.10.11 Monterey County Superior Court – Seaside Area Subbasin Adjudication

The Seaside Area Subbasin (DWR Basin #3-4.08), part of the Salinas Valley Groundwater Basin, was adjudicated in 2006 due to overdraft conditions (California American Water v. City of Seaside, et al., Super. Ct. Monterey County, 2006, Case No. M66343). In this case, the court decided the amount of groundwater that could rightfully be extracted by each landowner or party overlying the groundwater basin. The court also appointed a watermaster to oversee the judgment. Long-term pumping to meet demands in the Monterey area had caused a long-term decline in water levels that resulted in seawater intrusion in some groundwater aquifers of the Salinas Valley Groundwater Basin. The conditions were exacerbated when SWRCB Order 95-10 limited the available supply from the Carmel Valley Groundwater Basin, resulting in increased production in the nearby Seaside Area Subbasin (Presidio 2013a). CalAm must implement the requirements of the groundwater basin adjudication that include reducing pumping from the Seaside Groundwater Basin from approximately 1,876 afy in 2016 eventually to approximately 1800 to 2060 afy (CalAm's share of the Perennial Natural Safe Yield of the Seaside Groundwater Basin), and replenishing the Seaside Groundwater Basin as required by the adjudication.

3.10.12 State Water Resources Control Board Cease and Desist Order WR 2009-0060

On October 21, 2009, the SWRCB issued CDO WR 2009-0060, Authorizing and Imposing a Moratorium on Certain New or Expanded Water Service Connections for the California-American Water Company in its Monterey District, to prescribe a series of significant cutbacks to CalAm's pumping from the Carmel River alluvial aquifer from 2010 through December 2016. Under the SWRCB CDO, CalAm's customers may be subject to water rationing, a moratorium on water permits for new construction and remodels, and fines if pumping limits are exceeded. For water year 2011, the CDO set a production limit of 10,429 afy, about 856 afy less than water year 2009. In water year 2012, the pumping limit was reduced by another 121 afy. By 2016, CalAm was required to reduce its water withdrawals to 3,376 afy, a 70 percent decrease from the water withdrawal in 2009 of 10,730 afy. Recently, the SWRCB issued an amendment to extend CalAm's CDO until December 31, 2021 (Order WR 2016-0016). The revised order accommodates the anticipated pace of approval and implementation of several proposed projects, including: the Monterey Peninsula Water Supply Project, the Pure Water Monterey Ground Water Replenishment Project, and the Aquifer Storage and

Recovery project. The revised order maintains an Effective Diversion Limit of 8,310 afy through 2021, contingent on the achievement of milestones towards the proposed water supply projects. For each milestone that is missed, the Effective Diversion Limit is reduced by 1,000 afy until the diversion is reduced down to the legal limit.

3.10.13 Regional Water Management Agencies and Local Water Purveyors

Water at the Presidio is supplied by the private water purveyor CalAm within the jurisdiction of the MPWMD and all water users are subject to the City of Monterey's overall water production limit. Water supply is part of the City of Monterey's water allocation from the MPWMD, and new water permits are subject to MPWMD's permit requirements including water efficiency standards (Rule 142) and Water Efficient Landscape Requirements (Rule 23) (MPWMD, 2017).

Other potential water supply sources are regularly evaluated by the regional water management agencies and local water purveyors.

4. Affected Environment and Environmental Consequences

4.1 ANALYSIS APPROACH

In accordance with NEPA guidelines only resources which could be potentially impacted by the proposed action are analyzed in detail in this section. All potentially relevant resources were initially considered, however, those which were unlikely to be affected by the action were excluded from further analysis. Information for this analysis was taken from the Presidio Integrated Water Sustainability Concept Plan Programmatic Environmental Assessment, and from Federal, State, County and local online databases. No new major physical data collection efforts were conducted for this EA.

Significance criteria developed are based on quantitative criteria derived from specific numerical limits established by regulation or industry standard where possible. However, for some resource categories quantitative criteria do not exist. In these instances qualitative criteria were used in establishing significance criteria based on the vision and goals outlined by the regulatory setting. Impacts are classified as significant or not significant based on the significance criteria. Significant impacts are those that would exceed the quantitative or qualitative limits of the established criteria.

In accordance with NEPA, direct, indirect, and cumulative effects are considered in this analysis. CEQ regulations define direct effects as those that are “caused by the action and occur at the same time and place”, whereas indirect effects are those that occur “later in time or farther removed in distance, but are still reasonably foreseeable”(40 CFR 1508.8). Cumulative effects (40 CFR 1508.7) are those that result “from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.”

4.2 RESOURCE AREAS EXCLUDED FROM FURTHER ANALYSIS

Consistent with NEPA implementation regulations and guidance, this Draft EA analysis focus on those resources most likely to be impacted by the proposed action. Further impacts are discussed in proportion to their significance. The Presidio concluded that the Proposed Action would result in no impacts or negligible impacts to the resource areas identified in Table 4-1 and they are not considered further in this Draft EA.

Table 4-1: Resource areas not discussed further

Resource Area	Rationale
Agriculture and Forestry Resources	The Presidio lies in the middle of a developed area which has not been farmed in quite some time. Maps provided by the California Department of Conservation do not identify any prime farmland, unique farmland, farmland of statewide importance on the Presidio (2016). There is no Williamson Act contract that affects the project site

Resource Area	Rationale
	according to the County Assessor's Office. Likewise, NRCS does not identify any capable agricultural soils on the entirety of the Presidio (2019). There is no active forest land in the vicinity of the Presidio. The County of Monterey identifies the Presidio and the surrounding area as zoned urban and within the city limits (County of Monterey, 2010), except the Huckleberry Nature Preserve, which is zoned as other land. The project does not propose to rezone any areas. Therefore this resource category was excluded from further analysis.
Environmental Justice	According to the American Communities Survey (ACS), the median income of Monterey County is $63,000 per year, with 11 percent of families living below the poverty line for the last 12 months. According to JusticeMap.org, the average income adjacent to the project area is $61-69,000 per year, which is in line with the county average. In addition, racial and ethnic distribution adjacent to the project area is consistent with the county distribution (Kreider, 2016). This project would not result in the generation of any disproportionately high, adverse human health or environmental effects on minority, tribal or low income populations. The proposed project would occur within the confines of the installation, and since the area is already used for parking, no new stressors (e.g. light, noise, tailpipe emissions) would be introduced to the area.
Land Use and Planning	The Proposed Action will be conducted entirely within the boundary of the Presidio of Monterey. The Presidio of Monterey Real Property Master Plan (RPMP) and the Presidio of Monterey Integrated Water Sustainability Concept Plan (IWSCP) identify the trajectory and

Resource Area	Rationale
	major goals for development on the installation in addition to higher level governance documents. The RPMP identifies accommodating the growth of DLIFLC as a high priority. The IWSCP identifies the use of stormwater abatement projects as a priority of the installation. Therefore, as the impacts of this project are consistent with the governing plans, no further analysis was conducted. The Proposed Action will not have any direct negative impacts on coastal zone resources as it is located outside of the coastal zone boundary and no spillover effects are anticipated. Public coastal access and recreation will not be affected. Impacts to the marine environment are not anticipated as stormwater Best Management Practices (BMPs) will reduce the risk of runoff during construction and long-term effects of the new LID features would be beneficial to improving the water quality in the Monterey Harbor. Land resources are not anticipated to be affected as the Proposed Action is located within the already disturbed area and will not impact environmentally sensitive habitat areas; long-term effects of adding native vegetation and increasing infiltration will be beneficial to the habitat. Consultation with SHPO and tribes has occurred under NHPA. There are no known archeological or paleontological resources in the project area. Therefore, the Proposed Action does not have the potential to impact coastal zone resources.
Mineral Resources	According to maps prepared by the U.S. Geological Survey, there are no major mineral deposits or critical minerals in the vicinity of the proposed project area. Past mines nearby include the now closed

Resource Area	Rationale
	Jefferson Street Quarry which produced broken and crushed stone (USGS, 2018), less than one mile away, as well as the reclaimed Sand City Pit Mine (CGS, 2016), approximately three linear miles away. Historically, sand was quarried from the upper Presidio, however, these areas are now part of the Huckleberry Nature Preserve, and no future quarry is planned (Presidio, 2013). Therefore, the project is not within the vicinity of a site being used for current or future aggregate or sand production. The nearest active aggregate production site is the Pine Canyon Quarry located in Carmel Valley, approximately 15 miles away. There are no other mining sites for any type of mineral located in the vicinity of the project based on information from the California Geological Survey or the USGS. Therefore, the project has no potential to result in the loss of availability of a known mineral resource.
Population and Housing	This project would not develop new homes or business nor extend infrastructure into underdeveloped or undeveloped areas. The project would not displace any existing housing, change any zoning, or displace any people. The constructed parking lot would be built over an existing parking lot and industrial buildings, and there are no human settlements on the project site. Therefore the project has no potential to result in substantial growth, or have any other impacts on population or housing.
Public Services (including schools)	This project would not trigger an increase in human population to the area, nor an increased human use of the area, nor fundamentally alter traffic routes or patterns. Therefore there would not be any impacts to schools, parks, fire or

Resource Area	Rationale
	police services, or any other public services.
Recreation	Since this project would not trigger an increase in human population to the area, nor an increased human use of the area, and the project of and by itself does not result in the need for new recreational facilities, there would not be any impacts to recreation from the completion of this project.
Socioeconomics	This project would not generate appreciable, new permanent economic activity. Some temporary economic activity would be generated to the extent of completion of construction, however, due to the small scale and short duration of this project, the impact is expected to be negligible.
Traffic and Transportation	The Proposed Action would generate some construction-related vehicle trips within the Presidio and the surrounding area. However, these trips would be minor and short-term. Further, appropriate scheduling and arrangement of detours would make any impacts to traffic negligible, as the installation has multiple ingress and egress routes. Long-term traffic levels would benefit from the realignment of Stilwell road on the Presidio or in the surrounding area.

4.3 AESTHETICS

4.3.1 Affected Environment

The proposed project area is located on the Presidio of Monterey U.S. Army Garrison within Monterey County, California. According to county statistics approximately 3-5 million people visit Monterey County annually. Popular destinations include Fisherman's Wharf, the Cannery and the Monterey Bay Aquarium. Tourism is listed as a core area of the economy, and an economic pillar which supports the community (Monterey County, 2015). In particular, the county lists expansion of eco-recreation which is driven by the natural beauty of the county in addition to agricultural attractions, and edu-tourism, which focuses on tourism which is driven by social interest in historical features,

scientific inquiry, and academic institutions (Monterey County, 2015). The Pacific Coast Highway, California State Route 1, is a federally designated Scenic Byway and Highway 101 is an eligible State Scenic highway.

The Presidio possesses unique visual character due to the presence and arrangement of its contributing features including the designated historic district, Huckleberry Nature Preserve, charismatic military features such as a cemetery and soldier field, large mature trees, landscaping, and some Spanish style architecture.

4.3.2 Environmental Consequences

Potential impacts to aesthetic and visual resources are considered significant if the Proposed Action would substantially degrade the natural or constructed physical features of the Presidio, or other nearby aesthetic resources, which provide the area its character and value as an environmental resource.

Aesthetics are inherently qualitative. Therefore development of quantitative metrics which assess impacts to aesthetics are not always possible. Criteria for significance as well as a summary of impacts by alternative are summarized in Table 4-2.

Criteria for significance to impacts to aesthetics are: number of Presidio areas impacted, distance perceivable, vectors by which the change can be perceived, and duration of impact. Since the aesthetic quality of the Presidio is largely judged as a whole, those actions which impact more than one sector are most likely to have a net negative impact on the visual character. The distance at which a change to the aesthetic character is perceivable directly relates to how many people are likely to be impacted by the change. Similarly, the Presidio may be experienced in more than one way through multiple senses. The ambience of a place is built upon how all of these elements interact to create the distinct look and feel of an area. Therefore, if an action changes the character of a place as perceptible by more than one sense, it is more likely to impact overall character of the place. Finally, short term impacts to areas are less likely to degrade the character of a place than long term or permanent impacts.

Analysis of distance at which a change in viewshed was perceptible was conducted using the Viewshed 3D analyst tool in ArcMap 10.1. Raster data was obtained using Digital Elevation Models (DEM). The Sloat Monument, Oak Newton Park, and Soldier Field were chosen as viewpoints for the analysis. These points are high in elevation, publicly accessible, and/or locations where people would be seeking an aesthetically pleasant experience. Height offset was set at five feet above ground.

Table 4-2: Aesthetic elements impacted by alternative

Action	Number of Presidio aesthetic features impacted	Distance at which changes are perceptible	Vectors by which the change can be detected	Duration of impact
Proposed Action	(1) Demolition of buildings	Within the Proposed Project Area*	Visually	Temporary and Permanent
Alternative 1	(3) Demolition of buildings, removal of mature trees, urban heat island effect	Within the Proposed Project Area, and up to 0.15 miles away	Visually, temperature	Permanent
No Action	0	Not applicable	None/ No change	None

4.3.2.1 Alternative 1- Proposed Action

The Proposed Action would demolish buildings 279, 281, 282, 283 and construct a parking lot entirely within the footprint of the demolished buildings and the existing parking area. The new lot would utilize LID features such as landscaping and/or bioretention swale in the islands between the parking lanes, permeable pavement, and curb cuts to redirect water flow to reduce amount of runoff.

The proposed action would impact the Presidio's designated historic district aesthetic feature. The primary vector by which this feature would be impacted is visually. Based on a viewshed analysis conducted in ArcGIS, these changes would be perceptible only within the project area from standard eye level, five feet above ground surface (Figure 4-1). The large mature trees surrounding the area currently screen the project area from viewing. The topography of the installation also contributes to this effort, however, should the trees be removed, the demolition of the buildings would be apparent from Soldier Field and from Oak Newton Park. Due to the hilly topography of the installation, the project area is not visible from Sloat Monument. These changes would also be detectible from remote sensing imagery, however, the change would be imperceptible due to the scale of the landscape being observed.

The short-term visual impacts would result from ground disturbance; the presence of workers, vehicles, and equipment; and the generation of dust and vehicle exhaust associated with the removal of debris and material and project construction. Long term impacts would result from the loss of the four demolished buildings. Adjacent property owners would have an increased view to the south. However, views to the north, east, and west would not be affected by this project.

In addition, installation of the LID features, permeable pavement, bioswales and other landscaping would result in an aesthetically pleasing parking lot, which would be a benefit to the existing area. Use of permeable pavements would result in reducing nighttime urban temperatures as the air voids in the pavement structure provide an insulating effect. In total, this alternative would result in a beneficial impact to aesthetics.

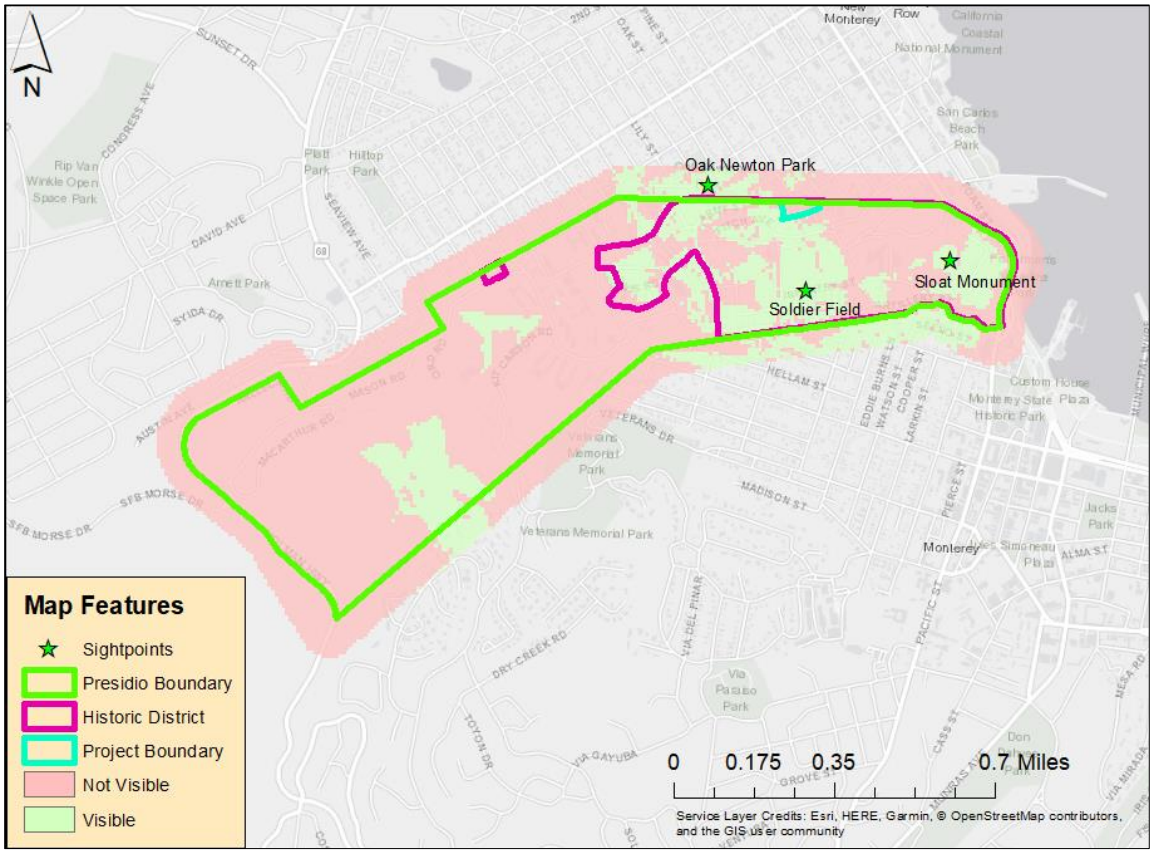

Figure 4-1: Results of viewshed analysis

4.3.2.2 Alternative 2- Conventional Parking Lot

Under alternative 2, the same four buildings would be demolished and a conventional style parking lot would be constructed. The short term construction impacts would be the same; however, the long term impacts would differ. In addition to the loss of the buildings, it is likely that the large mature trees would not be retained, and since the bioswales would not be installed, there would be a permanent impact to the landscaping of the Presidio due to a permanent reduction in greenspaces and an increase in unadorned paved areas. These changes would be detectible visually, however, because standard asphalt would be used in lieu of permeable pavement, the urban heat island effect would also be exacerbated. In total, impacts to aesthetics from this alternative are less than significant.

4.3.2.3 Alternative 3- No Action

Under the No Action Alternative the Presidio would not demolish the four buildings, and parking capacity would remain the same. Haphazard parking would continue,

contributing to a disorderly appearance. No new impacts would occur to aesthetic resources on the Presidio.

4.3.2.4 Avoidance, Minimization, and/or Mitigation Measures

None of the impacts discussed above rise to the level of significance, however, the following best management practices (BMP) could be implemented to further reduce impacts:

Aesthetic Resources (AR) BMP -1: Retention of mature large trees and use of night-sky friendly parking lot lighting would reduce the geographic area of impacts to aesthetic resources.

4.4 AIR QUALITY

4.4.1 Affected Environment

Impacts to the air quality environment require consideration of climate, topography, and local air quality conditions, as these factors interact to create the air volume experienced by sensitive receptors.

4.4.1.1 Climate

The Proposed Action is located in the Monterey Bay Unified Air Pollution Control District (MBUAPCD), now known as MBARD, which includes Monterey, Santa Cruz and San Benito counties. These counties form the North Central Coast Air Basin (NCCAB).The climate of Monterey County is temperate with abundant fog in the summer and clear days in the spring and fall. Average annual rainfall is 19.7 inches (most occurs between November and April). Average annual temperature is 56.5 degrees Fahrenheit (°F), with an average maximum temperature of 65°F and average minimum temperature of 48°F (Western Regional Climate Center 2016).

4.4.1.2 Topography

Monterey County possesses a rugged topography with the lowest elevations ranging from sea level to the highest elevations of over 5000 feet (USGS, 2018). Topographic analysis performed using ArcGIS indicate that elevations are lowest in the west and rise to the south and east due to the presence of the Central California Coast Ranges. Specifically, to the south, the Santa Lucia ranges rise to a maximum of 5,857 feet at Junipero Serra Peak with the Monterey peninsula extending out into the bay. To the east, the Diablo Ranges host elevations of up to 5,241 feet at San Benito Mountain. Nested in between the two mountain ranges is the Salinas valley which hosts rolling hills around the Salinas River.

4.3.1.2 Local Air Quality Conditions

The existing air quality conditions in the Proposed Action area can be characterized by regional monitoring data. Information obtained from the monitoring stations near the Presidio for the three-year time period 2015 through 2018 indicate that air quality in the region is relatively good, with few violations of the NAAQS and CAAQS (CARB 2019). Over time, exceedances have decreased markedly, of the period monitored, only 2016 experienced more than one exceedance for 8 hour ozone.

Areas are classified as either attainment or nonattainment with respect to NAAQS and CAAQS based on local monitoring data. If a pollutant concentration is consistently lower

than the federal or state standard, the area is classified as being in attainment of the standard for that pollutant. If a pollutant violates the standard for several consecutive years, the area is considered a nonattainment area. If an area is in nonattainment for a particular pollutant, but has three or fewer exceedances of the standards for that pollutant in the last year, the area is considered a nonattainment-transitional area. Finally, regions previously designated as nonattainment areas that since have obtained attainment, are designated maintenance areas.

The USEPA has classified the NCCAB, including Monterey County, in attainment for all pollutants under the federal NAAQS. CARB has classified the NCCAB under CAAQS as a nonattainment-transitional area for the state ozone (O_3) standards, a nonattainment area for particulate matter less than 10 microns in diameter (PM10) standard, and an attainment area for the state standards of particulate matter less than 2.5 microns in diameter (PM2.5), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb).

4.4.1.3 Sensitive Receptors

Sensitive receptors or populations are more vulnerable to air pollution effects than the general population. Sensitive receptors near localized air pollution sources are of particular concern. Typically, sensitive receptors include residences, schools, childcare centers, athletic facilities and playgrounds, churches, and long-term care/rehabilitation centers. There are numerous sensitive receptors to the north of the proposed project site including a Kindercare learning facility, two county parks, and residences ranging from 50 feet away to about a quarter of a mile.

4.4.2 Environmental Consequences

Analysis of the project's air quality effects follows the guidance and methodologies recommended in the MBARD CEQA Air Quality Guidelines (2008). The MBARD CEQA Air Quality Guidelines identify potentially significant impacts if the project may:

- Conflict with or obstruct implementation of the applicable air quality plan (MBARD's 2016 Air Quality Management Plan [AQMP]);
- Violate any air quality standards or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed qualitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations;
- Create objectionable odors affecting a substantial number of people.

Specifically, construction impacts from a project are considered significant if they:

  - Cause a violation of PM10 air quality standards nearby or upwind of sensitive receptors, based on whether the project would:
  - Emit greater than 82 lbs/day of PM10 if located nearby or upwind of sensitive receptors;

- Use equipment that is not “typical construction equipment” as specified in Section 5.3 of the MBARD CEQA Guidelines.

MBARD has also issued criteria for determining the level of significance of long-term, operational impacts. However, this project does not propose any operational uses or post-construction activities that would result in long-term impacts to air quality.

A project would conflict with or obstruct implementation of the MBARD 2016 AQMP for the Monterey Bay Region if it is inconsistent with the plan’s growth assumptions, in terms of population, employment, or regional growth in vehicle miles traveled. By extension, projects that result in an increase in population inconsistent with local community plans would also be considered inconsistent with the AQMP. This project would not impact population, employment, or regional growth in vehicle miles traveled, therefore this project is not in conflict with the AQMP.

The California Emissions Estimator Model (CalEEMod), version 2016.3.1, was used to estimate construction emissions from off-road equipment and fugitive dust generated during construction. CalEEMod quantifies emissions associated with the use of off-road equipment, on-road worker commute, and construction delivery and haul trucks. Fugitive dust emissions are quantified for grading and site preparation activities/earthwork, truck loading, demolition, and vehicle trips on paved and unpaved surfaces. The program calculates fugitive dust associated with onsite earthwork, including onsite grading and site preparation phases, based on the construction equipment to be used, hours of use, and the estimated area of disturbance.

4.4.2.1 Alternative 1- Proposed Action

The Proposed Action would generate temporary air pollutant emissions associated with building demolition, exhaust emissions from construction vehicles, exhaust emissions construction equipment, and from laying new cement and asphalt. Activities would generally consist of building demolition, demolition of the old parking lot. Demolition activities could liberate asbestos fibers or lead dust. Construction of the new subbase & laying the permeable pavement, installation of landscape islands, installation of new bioretention swales, lighting, painting and installing support signage would generate emissions. Inherent to construction, the Proposed Action would require grading, clearing, grubbing, excavation, and other earthmoving activities. Construction activity would be required to comply with the standard MBARD emission control measures to reduce fugitive dust and construction related emissions of PM10, described above. Additionally, demolition of the buildings would be subject to the requirements promulgated by NESHAP, OSHA, and MBARD governing building demolition on structures potentially containing asbestos or lead based paints.

Table 4-3 summarizes the estimated maximum daily construction emissions of PM10 and compares estimated emissions to the MBARD’s 82 lbs/day of PM_{10} guideline for determining the level of impacts due to construction emissions associated with the Parking Lot with LID features project. Assumptions in the model and model output are included in Appendix B. Based on the results of the model, impacts are anticipated to be less than significant with mitigation for the Proposed Action.

Table 4-3: Maximum daily emissions calculated for the construction phase of the proposed action

	ROG	NO_X	CO	SO_2	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$
Maximum Emissions (lbs/day) Mitigated	16.63	32.01	17.99	0.03	7.54	1.32	1.13	1.22
Unmitigated	16.63	32.01	17.99	0.03	46.17	1.32	4.72	1.22
Threshold	None	None	None	None	82	None	None	None
Threshold Exceeded?	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A

Source: CalEEMod Summer emissions data for Parking Lot with LID Features (Appendix B)

4.4.2.2 Alternative 2- Conventional Parking Lot

Similar to the proposed action, construction of a conventional style parking lot would generate temporary air pollutant emissions associated with building demolition, including asbestos and lead, exhaust emissions from construction vehicles, exhaust emissions construction equipment, and from laying new cement and asphalt. Activities would generally consist of building demolition, demolition of the old parking lot, construction of the new subbase & laying asphalt, installation of lighting, painting, and installing support signage. Inherent to construction, Alternative 2 would require grading, clearing, grubbing, excavation, and other earthmoving activities. Construction activity would be required to comply with the standard MBARD emission control measures to reduce fugitive dust and construction related emissions of PM10, described above. Building demolition would be subject to the requirements promulgated by NESHAP, OSHA, and MBARD governing building demolition on structures potentially containing asbestos or lead based paints.

Table 4-4 summarizes the estimated maximum daily construction emissions of PM10 and compares estimated emissions to the MBARD's 82 lbs/day of PM10 guideline for determining the level of impacts due to construction emissions associated with the Conventional Parking Lot Alternative. Based on the results of the model, impacts are anticipated to be less than significant with mitigation under this alternative.

Table 4-4: Maximum daily emissions calculated for the construction phase of the alternative action

	ROG	NO_X	CO	SO2	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$
Maximum Emissions (lbs/day)	12.08	25.27	16.45	0.03	3.85	1.15	1.34	1.08
Unmitigated	12.08	25.27	16.45	0.03	23.19	1.15	3.00	1.08
Threshold	None	None	None	None	82	None	None	None
Threshold Exceeded?	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A

Source: CalEEMod Summer emissions data for Conventional Parking Lot (Appendix B)

4.4.2.3 Alternative 3- No Action Alternative

Under the No Action Alternative, a parking lot would not be built and the buildings would remain. As such, no construction or fugitive dust emissions would be generated. Ongoing activities at the Presidio site would continue to generate emissions and contribute to overall emissions in the county, but no new emissions from construction or related activities would be generated. There would be no impact.

4.4.2.4 Avoidance, Minimization, and/or Mitigation Measures

As described above, air quality impacts associated with the Proposed Action and Alternative 2 would be less than significant with mitigation for hazardous airborne substances. Therefore, the following mitigation measures are required to ensure there are no significant impacts:

Air Quality (AQ) Required Mitigation-1: Adhere to NESHAP rules on standard practices for asbestos emission controls during demolition activities.

- All building materials that will be disturbed will either be tested to confirm presence of asbestos or if not tested, assumed to contain asbestos. Asbestos Containing Materials (ACM) and assumed ACM will be handled according to applicable laws and regulations with an asbestos certified contractor.
- Notification to the MBARD is required. Thresholds and notification are outlined in the Asbestos NESHAPs and District Rule 424 Guidance.
- Copies of survey results, abatement plans, and contractor certifications will be submitted to and reviewed by USAG POM Environmental Division prior to commencement of the project. Air monitoring results, reports, and completion reports shall be submitted to USAG POM Environmental Division at the completion of the project for required record keeping and to document ACM removal and handling.

In addition, regulatory requirements mandate that the following required measures be incorporated into the action for compliance:

Air Quality (AQ) Required Measure 1- Compliance with Standard MBARD Emission Control Measures. Construction activity would be required to comply with the following standard MBARD emission control measures to reduce fugitive dust and construction related emissions of PM10:

- Water all active construction areas as required with acceptable non-potable water sources to the extent feasible, with frequency based on the type of operation, soil, and wind exposure, and minimized to prevent wasteful use of water.
- Prohibit all grading activities during periods of high wind (over 15 mph).
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within Construction Projects that are unused for at least four consecutive days).
- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area.
- Haul trucks shall maintain at least 2'0" of freeboard.
- Cover all trucks hauling dirt, sand, or loose materials.
- Plant vegetative ground cover in disturbed areas as soon as possible with Presidio approved plants or utilize another approved stabilization method to minimize erosion.
- Cover inactive storage piles.
- Install wheel washers at the entrance to construction sites for all exiting trucks.
- Sweep streets if visible soil material is carried out from the construction site.
- Where feasible, use construction equipment that conforms to MBARD's Tier 3 or Tier 4 standards.
- Whenever feasible, construction equipment shall use alternative fuels such as compressed natural gas, propane, electricity, or biodiesel.
- If any trees or vegetation are disposed of via wood chipping, the operator shall contact MBARD's Engineering Division at (831) 647-9411 to discuss if a Portable Registration is necessary for the wood chipper being utilized for the project.
- Time spent on exposed soil surfaces shall be minimizes, where possible, machinery should operate from paved surfaces.

4.5 BIOLOGICAL RESOURCES

4.5.1 Affected Environment

Impacts to biological resources require consideration of special status species, migratory birds, eagles, vegetative communities, and other species. The following reports were referenced to obtain data about the affected environment:

- Integrated Natural Resources Management Plan (INRMP) for Presidio of Monterey and Ord Military Community, Monterey County, California (Presidio, 2008)
- Final Integrated Water Sustainability Concept Plan (Presidio, 2016b)
- Final Environmental Impact Statement, the Presidio of Monterey Real Property Plan (Presidio, 2013a)
- USFWS Biological Opinion on the Presidio of Monterey Real Property Master Plan (USFWS, 2013)

Additionally, queries of the FWS Environmental Conservation Online System: Information, Planning and Conservation System (USFWS, 2010), Critical Habitat Portal (CDFW, 2019), California Natural Diversity Database (CNDDB) (CDFW, 2019), and California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California (CNPS, 2019) were conducted to obtain comprehensive information regarding federally listed species and federally designated Critical Habitat known to or considered to have potential to occur within the project area. Quantification of impacts was conducted using GIS analysis.

In context, the project area consists largely of already developed surfaces. Most of the project area is paved, however there are a few mature Monterey Pines on the east side of the project area, and an enclosed grassy area to the west. The west side seems to be well used by wildlife, as deer, song birds, and raccoons were observed in the area on the day of the site visit. The trees is this section are ornamentals, however, they appear to be mature.

4.5.1.1 Special Status Species

On the Presidio at large, the only special status species that has been confirmed is Yadon's Piperia. Gowen cypress (*Callitropsis goveniana*), has the potential to occur but has not been recorded on the Presidio (Figure 4-2). The primary threats to Yadon's Piperia include loss of habitat, competition from non-native species, and herbivory (USFWS, 2004; 2009). Extensive mapping and monitoring efforts by the Presidio in connection with the biological opinion indicate that there are no Yadon's Piperia in the project area. The most recent set of surveys were conducted in April and June of 2018(Presidio, 2017a). Presence of this species is precluded by the existing impervious surface, structures, and maintained lawn in the project area. Surveys for special status species and their habitats will be conducted prior to ground disturbing activities. The monarch butterfly is currently under review for listing by USFWS. Should the species become listed, and should this project be on-going, potential impacts to monarch butterflies will be evaluated.

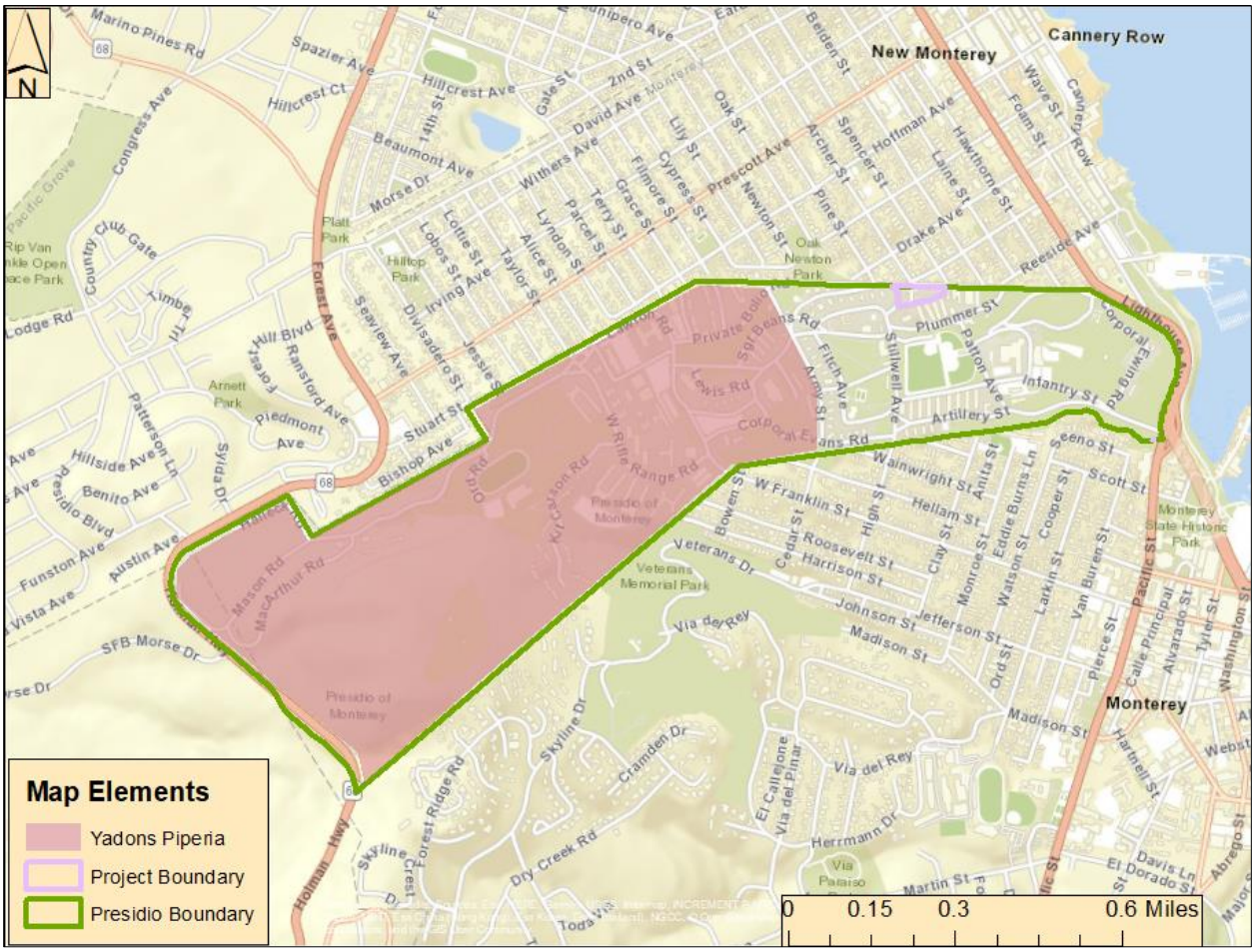

Figure 4-2: General extent of Yadon's Piperia on Presidio of Monterey

4.5.1.2 Migratory Birds

Due to the location of the Presidio, many migratory birds stop nearby to nest and forage. According to online databases 21 species of migratory birds routinely use the surrounding area for nesting or foraging (Figure 4-3). Bird watching databases have recorded their presence in most years with the majority of sightings just outside the installation at Cannery Row. However, Nuttall's Woodpecker, Oak Titmouse, song sparrow, spotted towhee, and Wrentit have been observed at the lower presidio Historic Park and the adjacent Oak Newton Park. Access restrictions likely bar reporting of these species on the installation proper. It is appropriate, therefore, to assume presence if suitable habitat is present.

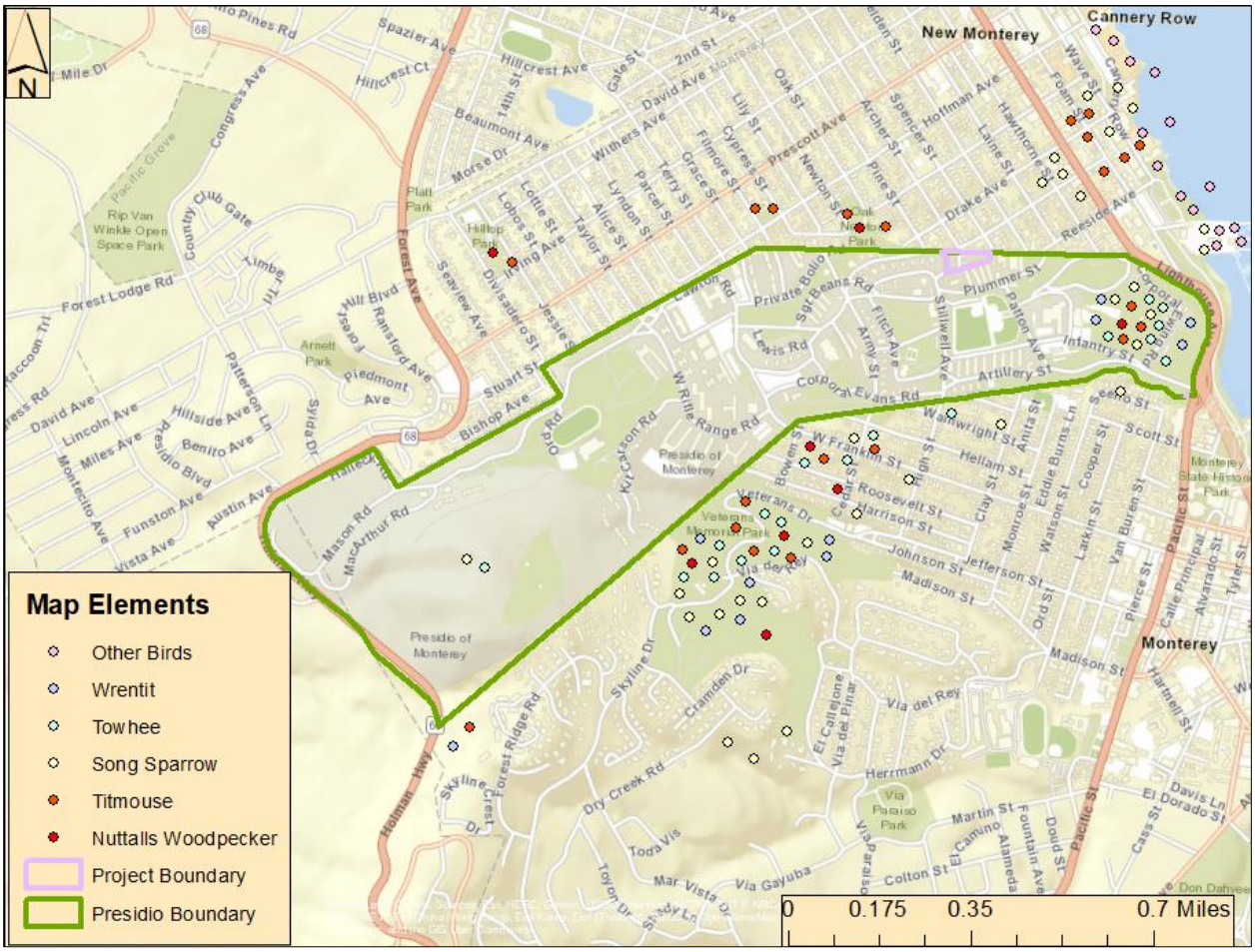

Figure 4-3: Migratory Birds present in the vicinity of the project area

4.5.1.3 Eagles

Bald Eagles have been observed just outside of the bounds of the installation, foraging just offshore. No eagle nests have been noted on the installation or in the immediate vicinity.

4.5.1.4 Vegetative Communities

The IWSCP PEA outlines several types of vegetative communities that occur on the Presidio. In the project area specifically, two types of vegetative communities occur, Developed and Grass Lawn with Scattered Trees (Figure 4-4).

Developed

Developed areas are characterized by impervious surfaces such as roads, parking lots, and buildings. Incidental and landscaped vegetation consisting of native and nonnative turf grasses and forbs, with native and horticultural trees and shrubs occurs or has been planted along borders and between buildings. Most herbaceous vegetation is maintained as a lawn, whereas most woody vegetation is maintained as landscaping. Plant species found in the grass/lawn areas include fescues (*Festuca* spp.), kikuyu grass (*Pennisetum clandestinum*), hare barley (*Hordeum murinum ssp. leporinum*), hop clover (*Trifolium campestre*), English daisy (*Bellis perennis*) and cutleaf plaintain

(*Plantago coronopus*). Trees species present include Monterey pine (*Pinus radiata*), coastal live oak (*Quercus agrifolia*), blue gum eucalyptus (*Eucalyptus globulus*), coast redwood (*Sequoia sempervirens*), and Monterey cypress (*Hesperocyparis macrocarpa*) which are in the project area in the landscaped islands. These vegetated areas undergo regular maintenance such as mowing, and pruning (Presidio, 2013b).

Grass Lawn with Scattered Trees

The Grass Lawn with Scattered Trees plant community is composed of the same species as those found in the developed areas, however, they occur together. Grass Lawn with Scattered Trees plant community offers higher quality habitat value to wildlife species due to the presence of trees. Grass and trees provide nesting and foraging opportunities for a variety of migratory birds as well as cover and foraging opportunities for mammals.

Figure 4-4: Aerial imagery depicting the relative locations of vegetative communities in the project area

4.5.1.5 Other Species

During the field study conducted for the IWSCP EA the following animal species were observed in the Grass Lawn with Scattered Trees habitat type: golden-crowned sparrow, white-crowned sparrow (*Zonotrichia leucophrys*), Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhychos*), western bluebird (*Sialia mexicana*), turkey vulture (*Cathartes aura*), Say's phoebe (*Sayornis saya*), Townsend's

warbler (*Setophaga townsendi*), yellow-rumped warbler (*Setophaga coronata*), black-tailed deer, Botta's pocket gopher (*Thomomys bottae*), and raccoon. Feral house cat (*Felis catus*) was also observed.

4.5.2 Environmental Consequences

Significance of impacts to biological resources can be determined directly through the number of individuals killed or displaced, or indirectly through the acreage of habitat destroyed or disturbed. The greater the number, the greater the impact. This analysis quantifies the level of impact to each contributing biological resource element as well as the magnitude of that impact, where mortality is considered a more significant impact than displacement. Additionally, permanent impacts have a larger effect than temporary impacts. A summary of the impacts anticipated is summarized in Table 4-5.

Table 4-5: Summary of impacts to biological resources

Action	Number of biological resource elements impacted	Mortality or Displacement	Magnitude of Impact	Duration of impact
Proposed Action	3	Displacement	Less than 1 acre	Temporary and Permanent
Alternative 2	3	Displacement	Less than 1 acre	Temporary and Permanent
No Action	0	Not applicable	Not applicable	None

4.5.2.1 Alternative 1- Proposed Action

The Proposed Action would demolish the existing parking lot, buildings, and appurtenant features and establish a new parking lot with LID features.

This project is located in a developed area of the Presidio, and is bordered to the north by residential neighborhoods in the City of Monterey. It is less likely to support Yadon's piperia, and there are no known occurrences near the project area (Presidio, 2016a), therefore there are unlikely to be any impacts to special status species.

There are no known eagle nests in the area, nor is there foraging habitat for eagles therefore there are unlikely to be any impacts to eagles from this project.

Nesting birds may be disturbed by construction activities, causing them to avoid areas of active construction. This would result in temporary loss of foraging habitat and could result in nest abandonment. Direct impacts (mortality) could also occur during tree removal if active nests were present. Further permanent indirect impacts resulting from a loss of habitat could occur if large mature trees are removed or if lawn and tree vegetative types are removed. Additionally, nighttime lighting in the area could permanently preclude birds from nesting in the area. If it is assumed that all areas with trees are impacted a total of 0.30 acres would be permanently lost.

Similar to nesting birds, if grass/lawn habitat with trees or large mature trees are removed from the project site while constructing the new parking lot, the species who previously used those areas would be permanently displaced. If it is assumed that all areas of this habitat type are removed from the area, a total of 0.25 acres would be permanently lost. Impacts to biological resources would be less than significant. However, incorporation of avoidance and minimization measures is required to maintain compliance with the existing BO to which this project is subject.

4.5.2.2 Alternative 2- Conventional Parking Lot

Since the end product of Alternative 2 is effectively the same as Alternative 1, there is no substantive difference between the environmental impacts from a biological resources standpoint. Both alternatives would displace the same amount of habitat for the same duration. Bioswales and interlandscaping in the LID parking lot would likely be too small, and the trees too young to provide appreciable habitat. Similarly, both alternatives would utilize the same avoidance and minimization measures if implemented. Impacts to biological resources would be less than significant. However, incorporation of avoidance and minimization measures is required to maintain compliance with the existing BO to which this project is subject.

4.5.2.3 Alternative 3- No Action Alternative

The No Action Alternative would result in the project area remaining in its current condition. There would be no impacts to Yadon's piperia, or other special status species, and no trees would be removed. Migratory nesting birds would not be affected by construction activities, assuming construction had occurred during the nesting season. Existing development and maintenance activities would continue to result in periodic disturbance to wildlife and plant species. However, overall, there would be no impact associated with the No Action Alternative.

4.5.2.4 Avoidance, Minimization, and/or Mitigation Measures

To reduce impacts to biological resources the following measures must be implemented with any action alternative as applicable to maintain compliance with the existing BO:

Biological Resources (BR) Required Measure-1: Worker Environmental Awareness Program (WEAP). Prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend WEAP training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the project area, including Yadon's piperia. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, review of the limits of construction and mitigation measures required to reduce impacts to biological resources in the work area, and penalties for non-compliance. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. All personnel shall sign a form, provided by the trainer, documenting they have attended the WEAP training and understand the information presented to them.

BR-2: Nesting Bird Protection - For projects that may result in tree felling or removal of trees or vegetation that may contain a nesting bird, construction activities should occur outside of the nesting season, if feasible, generally between September 1 and January 31. If construction activities must occur during the nesting season (generally February 1 to August 31), surveys for nesting birds covered under the Migratory Bird Treaty Act shall be conducted by a Directorate of Public Works Environmental Division- (DPWE) approved biologist no more than 10 days prior to vegetation removal. The surveys shall include the entire disturbance area plus a 500-foot buffer around the site, as feasible. If active nests are found, all construction work shall be conducted outside a buffer zone from the nest to be determined by the approved biologist and DPWE. Typical buffer distances consist of up to 250 feet for non-raptor bird species and up to 500 feet for raptor species. Larger buffers may be required based upon the species, status of the nest, and type of construction activities occurring near the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young no longer rely on the nest site. A DPWE-approved biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer.

BR-3: Invasive Weed Prevention/Reseeding –

- Plant species used for landscaping shall not include invasive or noxious species. If invasive species such as French broom, Eucaplytus sp., pampas grass (*Cortaderia* spp.), or ice plant (*Carpobrotus edulis*) are discovered in area proposed for disturbance they shall be removed. All equipment, including clothes and shoes, shall be free of seeds prior to entering the work area. All invasive plant seeds shall be contained (in plastic bags) and taken to an appropriate disposal facility.
- If disturbed areas require reseeding or hydroseeding, a DWPE approved mix of locally native species shall be used.

BR-4: Avoid negative impacts to protected trees (including Monterey pine, coast live oak, and Monterey cypress) to the maxim extent feasible, by installing temporary fencing around all trees identified for preservation prior to work. Generally fencing shall be located at the edge of the root zone, located out a distance 15 times the DBH in all directions. Fencing shall be rigidly supported and maintained during the project. Fenced areas shall not be used for material stockpile, or equipment.

BR-5: Ensure that no irrigation, trenching, compaction, or other soil condition altering activities occur within the drip line of naturally occurring Monterey pine, coast live oak trees, Monterey cypress, and horticultural trees unless necessary or unavoidable. Such activities can compromise the health and structural stability of the tree, and can create a safety hazard. If unavoidable, the proponent shall coordinate the activity with an ISA-certified arborist and Presidio of Monterey Environmental Division.

BR-6: Tree replacement would be per the Presidio INRMP as assessed by the Presidio Natural Resource Manager (NMR). Final landscape design must be in accordance with the INRMP and approved by the NRM.

BR-BMP-1: To the extent feasible, as permitted by with FP/ATP, night sky friendly parking lot lighting should be used. Specifications for this lighting can be found in International Dark Sky Association and Illuminating Engineering Society of North America's Model Lighting Ordinance (2011).

4.6 CULTURAL RESOURCES

The Presidio has a documented history of occupation spanning at least 10,000 years, including occupation by Native Americans, Spanish, and Mexicans. A more detailed description of the Presidio's history is available in the Presidio ICRMP (Presidio 2004). The Presidio contains several significant cultural resources listed on the NRHP and CRHR as well as sites listed in the NAHC's Sacred Lands File. Important cultural resources within the Presidio include the Presidio Historic District, the El Castillo Historic District, archaeological sites and Native American burials.

4.6.1 Affected Environment

The Presidio ICRMP identifies strict protocols for addressing cultural resources during the design phase of any project occurring in the Presidio. These protocols are outlined in the standard operating procedures and cover such items as regulatory compliance and the treatment of cultural resources. Based on a review of records held by the Presidio and by the Northwest Information Center, 12 resources are recorded in the Presidio by the California Historical Resources System (CHRIS), including midden areas, a coastal occupation site, historic-era adobe wall, historic period refuge deposits, a Spanish era military fort (i.e., El Castillo), an American era military fort (i.e., Fort Mervine), and a covered landfill. These resources would not be impacted by the Proposed Action. The Presidio also has an historic district determined eligible for the NRHP and containing 124 historic resources and one individually-listed resource. Historic roads within the Presidio include Lewis Road, Kit Carson Road, Fitch Avenue, Colton Avenue, Sierra Avenue, Plummer Street, Patton Avenue, Artillery Street, Infantry Street, Army Street, and Sergeant Beans Road.

Building 279

The building was constructed between 1903 and 1904 as a wagon shed and is presently used for parking. Alterations include enclosed double doors for part of the façade. The structure requires maintenance. Building 279 was most recently recorded in 1985, and USACE completed an update to the recording of the district elements in 2018. Building 279 appears has some dry rot, as well as chipped and peeling paint visible on the building exterior.

Building 281

This building was constructed in 1921 as a repair shop for use by the motor pool and was subsequently used as a blacksmith shop and temporary fire station. Presently, it is used by installation security personnel to store equipment. The interior of Building 281

has been heavily damaged by pest infestation and the exterior shows signs of dry rot, chipped and peeling paint, and broken and boarded up windows. Building 281 was most recently recorded in 1985, and USACE completed an update to the recording of the district elements in 2018.

Building 282

Originally constructed in 1903 as a coal shed, then subsequently used as a plumbing shed and janitorial office, it is presently vacant. Alterations for Building 282 include the addition of windows at the north and east elevations and the original double equipment door was changed to a fixed smaller door. The interior of Building 282 has been heavily modified and damaged by water. Building 282 was most recently recorded in 1985, and USACE completed an update to the recording of the district elements in 2018. The exterior has chipped paint, dry rot, broken and boarded up windows, and peeling asphalt shingles on the roof.

Building 283

The first use of this building was as a water pump station in 1903. Most of the building is currently vacant but the middle section contains equipment that was previously owned and operated by California American Water. Building 283 was enlarged in 1908 and some alterations were made to the exterior of the building (façade doors added, windows removed, sliding doors removed). Building 283 was most recently recorded in 1985, and USACE completed an update to the recording of the district elements in 2018. Building 283 is in good condition, appearing largely unchanged since 1985.

Presidio of Monterey Historic District

The design of the Historic District is such that the contributing buildings within the district face east toward the Pacific Ocean. The 1903 buildings (279, 282, and 283) were constructed as part of the reactivation of the post to support garrison troops returning from combat in the Philippines. They are three of the eleven surviving utilitarian structures in this section of the post erected at the Presidio between 1903 and 1904. They contribute to the Historic District as examples of the basic form of utilitarian style of the early Presidio and for their association with the events of 1902-1903 that led to the opening of the Presidio and other Army posts on the Pacific Coast. Built in 1921, Building 281 is architecturally undistinguished and significant only for its association with the school for auto mechanics, which was located at the Presidio in 1920.

Archaeological Survey

An archaeological site visit to the Presidio was conducted January 30, 2017, including a full survey of the project locations being analyzed here at the project level. No previously unrecorded cultural resources were identified during the site visit.

4.6.2 Environmental Consequences

Potential impacts to historic properties and/or archaeological resources are considered significant if the Proposed Action or alternatives would alter or destroy any part of a cultural resource or its setting.

4.6.2.1 Alternative 1- Proposed Action

The Proposed Action would demolish buildings 279, 281, 282, and 283. In their place a parking lot with LID features would be constructed. Demolition of buildings 279, 281, 282, and 283 would result in an adverse effect to these buildings, which are contributing elements the Historic District; however, their demolition will not result in an overarching adverse effect to the Historic District's eligibility for listing on the National Register of Historic Places (NRHP). There are other buildings in the Historic District that are representative of the utilitarian function and similar type of construction that retain sufficient integrity of the characteristics that qualify the overall Historic District for listing in the NRHP. As a result, the NRHP eligibility of the Historic District will not be adversely effected by the demolition buildings 279, 281-283.

Buildings 279, 281-283 are not the most visually prominent structures within this part of the Historic District, however, their removal could affect the view shed because the integrity of the original plan and layout of the area would be altered, and the view towards Buildings 279, 281-283 from the surrounding District would be modified. The undertaking will not adversely affect the view shed because, as utilitarian structures, Buildings 279, 281-283 were intentionally not located in a visually prominent area, and hence were constructed on the northern periphery of the District at the base of an eastern facing slope where they cannot be seen from the Officer's Quarters located above. Other buildings and vegetation surrounding the area of direct impact partially obscure buildings 279, 281-283, as they are also some of the shorter buildings within this part of the Historic District. Thus, the overall integrity of setting, feeling, and association of the view shed as it contributes to the eligibility of the Historic District would not be compromised by implementation of the undertaking.

Therefore if the Proposed Action were implemented, mitigation would be required to reduce the impact of demolition of buildings 279, 281-283, contributing elements of the Historic District, to below the level of significance.

4.6.2.2 Alternative 2- Conventional Parking Lot

Under this alternative, the four buildings would still be demolished and there would still be an impact to cultural resources. Mitigation would be required to reduce the impact below the level of significance.

4.6.2.3 Alternative 3- No Action Alternative

Under the No Action Alternative, implementation of the Proposed Action would not occur. No ground disturbance would take place. As such, no cultural resources would be affected. There would be no impact.

4.6.2.4 Avoidance, Minimization and Mitigation Measures

In order to mitigate for the demolition of the four historic buildings, the following mitigation must occur to reduce impacts to less than significant:

Cultural Resources (CR) Required Mitigation-1: Document buildings 279, 281, 282 and 283 in accordance with the Historic American Buildings Survey (HABS) documentation standards:

- In large format (4 inch x 5 inch or larger negative size) photographs showing the resources in context as well as details of their historic architectural features, which shall be processed for archival permanence in accordance with the enclosed photographic specifications. Specifically:
  - General contextual views of the buildings showing them in relationship to the surrounding buildings, structures and landscape;
  - Views of all elevations of each building (oblique views of buildings 279 and 282);
  - Views of exterior architectural details, including windows, entryways, siding, roof, and any other significant elements;
  - Views of interior spaces and interior historic detailing;
  - A separate photographic index shall be prepared for each building;
  - Provide 8 inch by 10 inch photographic reproductions of original construction drawings;
  - Provide three written historical and descriptive reports shall be prepared for each building according to HABS guidelines;

CR-2: Donate the HABS to the National Park Service, where it will be accessible to the public at the Library of Congress. The HABS will also be accessible to the public in the Historic Records Collection (archives), of the U.S. Army's Defense Language Institute Foreign Language Center, Monterey, California.

CR -3: An archaeologist meeting the Secretary of Interior Standards (per 36 CFR § 61) and a Native American consultant will be on-site during ground disturbing activities associated with this Undertaking to ensure a prompt response in the event of an unanticipated discovery of cultural resources. If, during the course of the Undertaking, there is an unanticipated discovery of cultural resources, all construction activity within 30-meters (100-feet) of the resource shall immediately halt. Any exposed archaeological or historic resource will be protected from further harm. The Army will inspect the discovery and will apply the National Register criteria to determine if the discovery is eligible for listing in the NRHP. The Presidio may assume a property to be eligible pursuant to 36 CFR 800.13(c). The Presidio shall notify the SHPO, the ACHP, and Native American tribe(s), as appropriate, within 48 hours of the discovery and shall provide formal notification of the Army's assessment of National Register eligibility and proposed actions to resolve any adverse effects.

The SHPO and the Native American tribe(s) shall respond within 48 hours of the notification. The Presidio shall take into account their recommendations regarding National Register eligibility and the proposed actions, and then carry out the appropriate actions. The Presidio shall provide the Consulting Parties a report of the actions when they are completed. Should the discovered cultural resource be identified by Native Americans as a property of traditional cultural or religious significance, the Presidio will consult with the appropriate Tribe regarding eligibility and treatment. Post-review discoveries which are not being adversely affected by the activity and which can be avoided, will be protected, monitored, and to the extent possible, avoided by future operations.

CR-4: If an inadvertent discovery of human remains occurs, work shall cease within 30-meters of the find for 30 days and immediate notification must be made to the Presidio Cultural Resources Program Manager (CRM). The Presidio CRM will preliminarily determine if the remains are from a recent crime scene (50 years old or less) or are of Native American descent and will immediately notify the Presidio Garrison Commander. If the remains appear 50 years old or less, the Army's Criminal Investigation Command will assume control of the crime scene. If the remains appear to be of Native American descent, the Presidio will coordinate with the appropriate Native American tribes. An inadvertent discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony will require implementation of procedures set forth in the ICRMP and AR 200-1, which includes consultation procedures and planning requirements in accordance with Section 3 of NAGPRA; 25 U.S.C. 3001 et seq.; 43 CFR 10).

4.7 GEOLOGY & SOILS

4.7.1 Affected Environment

The geologic and soils environment consists of the mineral, rock, soils, and the associated physics that underlie and impact the project area. Impacts to these resources occurs from ground disturbing activities. In addition, however, how these existing resources impact the project, and the dangers they may pose on their own or as exacerbated by the proposed project are considered in this section.

4.7.1.1 Geology

The Presidio is near the boundary of the North American and Pacific plates, along the western margin of the Coast Ranges physiographic province. The province contains many elongated ranges and narrow valleys that generally parallel the coast. The Presidio is located along the southern margin of Monterey Bay and lies at elevations ranging from approximately 30 to 770 feet above mean sea level (Presidio, 2013a).

The Presidio overlies a geologically complex subsurface consisting primarily of variously weathered granites and marine terrace deposits (USACE 2009). The bedrock is weathered to varying degrees, depending on relative location to drainage features, fractures, joints, and rock type. The subsurface profile varies substantially, even over short distances (Presidio, 2013a). Ancient sand dunes also add to the geologic complexity of the Presidio. The ancient dunes were formed as terraces were cut by the rising oceans and covered with beach deposits as the oceans returned to former levels. The raised beach terraces are similar to others that line the Pacific coast.

4.7.1.2 Soils

The two primary soil types encountered on the Presidio are Narlon loamy fine sand and Sheridan coarse sandy loam. Narlon soils are located on the gently sloping dissected marine terraces that occur in most of the developed portions of the Presidio, and underlie the entirety of the project area. Narlon series soils are poorly drained with slow to medium runoff rates. Erosion hazard is considered moderate (Presidio, 2013a). The Narlon soils can pose severe limitations for construction activities because of the low

strength, high shrink-swell potential of the clay subsoil, and acidity that is corrosive to steel and concrete. These soil limitations often require special engineering solutions (Presidio, 2013a).

Soil thickness varies across the site from less than one foot to approximately 30 feet (USACE, 2009). Borings drilled at the Presidio encountered predominantly clayey and silty sands overlying granite bedrock. At some locations, the sands derive from the underlying granite bedrock and grade, with depth, into weathered bedrock. In other locations, clayey and silty sands were deposited directly onto the bedrock surface during formation of the marine terrace platforms during the late Pleistocene.

4.7.1.3 Seismicity

The Presidio is located in a highly seismically active region with several major faults and fault zones in proximity, including the San Andreas Fault Zone, approximately 25 miles northeast; the San Gregorio-Hosgri Fault, approximately 19 miles northwest; and the Palo Colorado Fault, approximately 6 miles west. The Sur-Nascimento Fault Zone is approximately 10 miles southwest of the Presidio and may exhibit substantial seismic activity. There are lower magnitude fault zones near the site, the closest of which is the Monterey Bay Fault Zone, approximately one mile offshore in Monterey Bay (Presidio, 2013a). This is the closest active mapped fault to the Presidio. No known active faults have been identified in the Presidio boundaries (Presidio, 2013a).

The Monterey Peninsula is in Seismic Risk Zone 4, identified as a seismically active area by the Uniform Building Code. Areas in Zone 4 are expected to experience severe ground shaking and "major destructive damage" in response to seismic activity within the region (Presidio, 2013a). Several moderate to large magnitude historical earthquakes have caused significant ground shaking in the past.

4.7.1.4 Liquefaction

Liquefaction is the process in which water-saturated sand and silt change from a solid to a liquid state. Liquefaction can be caused by strong shaking of the sediments, which happens during an earthquake. Liquefied sediments lose their strength to support overlying structures. Areas with a shallow groundwater table or perched groundwater would be susceptible to liquefaction in a strong earthquake.

The potential for liquefaction of soils during an earthquake at the Presidio is considered minimal because of shallow soils and lack of groundwater.

4.7.1.5 Landslides

Landslide potential is considered minimal for most of the Presidio because the majority of the buildings are on a series of gently dipping marine terrace platforms cut into a bedrock hill adjacent to Monterey Bay. Slopes in the project area are approximately 5-10 percent (Appendix C).

4.7.2 Environmental Consequences

Evaluation of impacts to and from geology and soil as a result of the project consider the following: proximity to an Alquist-Priolo Zone, seismic ground shaking, liquefaction, landslides, geology, loss of topsoil or erosion, lateral spreading, subsidence, and soil expansion. Potential impacts to geology and soils are considered significant if the

Proposed Action would expose people or structures to potential substantial adverse effects, including a risk of loss, injury, or death. Geology and soils impacts also are considered significant if the Proposed Action would result in substantial soil erosion or the loss of topsoil.

4.7.2.1 Alternative 1- Proposed Action

Implementation of the Proposed Action would not include construction of habitable structures. Therefore, impacts regarding seismicity are considered less than significant and no mitigation measures are required.

The Proposed Action could result in direct impacts related to short-term erosion and soil stability. Construction activities such as vegetation removal or grading could result in disturbed and exposed soils that would be susceptible to erosion by water and wind. Construction activities could also result in the destabilization of hillslopes, which would increase the potential for landslides. Since the majority of the site is already paved or disturbed, little additional grading would be required and would have minimal effects to topography or soils. Construction activities on undeveloped portions of the proposed project area would result in topsoil loss of approximately 0.25 acres.

Installation of permeable pavement would increase groundwater percolation which would increase the water availability to underlying Narlon soils which may increase the chance for liquefaction events. An appropriate geotechnical analysis would need to be conducted to design an appropriate system with this risk in mind during the design phase of the project. There are no anticipated indirect impacts. Impacts to geology and soils under this alternative are less than significant.

4.7.2.2 Alternative 2- Conventional Parking Lot

Environmental impacts and risks would be similar under this alternative as the proposed action. As no habitable structures would be built under this alternative, there would be no increased risk to people or property due to seismicity.

Construction of a conventional parking lot would carry the same environmental impacts as the Proposed Action during construction with construction activities exposing soils and hillslopes to erosion. The construction footprint would be the same, therefore the short term impacts would be the same.

However, since this alternative would increase runoff due to an increase of impervious surface of at least 0.25 acres, downslope soils would be affected and subject to increased erosion. Impacts to geology and soils under this alternative are less than significant.

4.7.2.3 Alternative 3- No Action Alternative

Under the No Action Alternative, the existing parking lot would not be upgraded and expanded and the existing buildings and undeveloped areas would remain the same. Eventually, the existing buildings would have to be upgraded for earthquake compliance to reduce risks from seismic events. Since the existing area is already covered in impervious surface, stormwater would continue to accelerate over the surface and impact soils downslope. However, there would be no increased risks of soil loss or hillslope destabilization in the proposed project footprint.

4.7.2.4 Avoidance, Minimization, and/or Mitigation Measures

Impacts to geology and soils are less than significant under all alternatives however, the following BMPs should be implemented to reduce soil losses.

Geology and Soils (GS) BMP 1- Modified hillslopes associated with the constructed project shall be constructed to ensure stable post-construction conditions. Soil stabilization may include, but is not limited to:

- Reinforcement measures, such as anchors or micropiles, to increase the shear strength of the hillslope.
- Surface stabilization, such as shotcrete, to increase the surface strength of the hillslope.
- Drainage mechanisms to reduce the water pressure in the vicinity of the hillslope and to prevent over-saturation of soils.
- Geometry modifications to reduce the angle of the hillslope and minimize the potential for landslide.

4.8 GREENHOUSE GAS EMISSIONS & CLIMATE CHANGE

4.8.1 Affected Environment

Levels of CO_2 in the atmosphere are currently in excess of 400 ppm, a level which has not been seen in over 800,000 years. The current rate of increase is approximately 3 ppm per year (NOAA, 2018). This corresponds to an increase in global mean temperature of 1.3 degrees Fahrenheit (F) and global mean sea levels rising at an average rate of 1.7 mm/year (plus or minus 0.5mm) over the past 100 years (NOAA, 2018).

As a coastal community, Monterey County is especially vulnerable to the effects of climate change. Therefore by inclusion, the Presidio is also vulnerable to the effects of climate change. The lowest elevation of the Presidio sits at 30 feet above mean sea level, which is above the conservative estimates of sea level rise, but is well within the severe and catastrophic levels of sea level rise (IPCC, 2018). Further, storm surge could endanger low lying sections of the Presidio even with modest amounts of sea level rise. Saltwater intrusion may already be affecting groundwater basins in the county.

4.8.2 Environmental Consequences

Analysis of significance of impacts to greenhouse gasses and climate change requires a consideration of the potential effects of a proposed action on climate change as indicated by assessing GHG emissions, opportunities for carbon sequestration, and the effects of climate change on a proposed action and its environmental impacts.

CEQ recommends that direct and indirect GHG emissions are accounted for by way of quantification tools; an estimation of carbon sequestration implications should be included in this quantification. Impacts are considered significant if they contribute a measurable one time or continuous source of GHG to the state GHG budget, or eliminate a significant carbon sequestration source from the state budget. Use of the Federal emissions inventory is inappropriate in this regard as the budget is so large, no

single action contributes measurably, but all actions contribute some. County data is not available, therefore use of the state GHG budget is appropriate.

California's most recent calculated GHG emissions were 429.4 $MMTCO_2e$ (CARB, 2016). As the Presidio's primary business is education, this analysis utilized the commercial sector, which houses education as a total by which to compute the relative emissions contribution from the project. In 2016 the higher education sector in California emitted 230.358 tons of CH_4, 488,543.955 tons of CO_2, and 274.577 tons of NO_2 (CARB, 2016). Emissions estimates for construction of the parking lot was conducted using CalEEMod Ver. 3.1, sequestration was estimated using 50 percent of the estimated dry mass of each tree (Carlowicz, 2012). Trees at the site were not measured, however, the smaller trees were visually estimated to be an average of 12 inches in diameter at breast height (DBH), and 25 feet tall, the large Monterey Cypress was estimated to be approximately 24 inches in DBH ant stand approximately 40 feet tall. Estimates were made conservatively. Tree volume was calculated using a simple cylinder equation, then reduced by 30 percent to achieve dry mass. Standards for density were obtained from forest service look up tables (USFS, 2009). Carbon estimates were then rounded down to the nearest ton. Soil carbon storage was not included in this analysis as current organic matter percentage is unknown. Totals as calculated by CalEEmod are summarized in Table 4-6.

Table 4-6: Greenhouse Gas Emission Summary

Gasses in lbs/day	Bio-CO_2	NBio- CO_2	Total CO_2	CH_4	N_2O	CO_2e
Proposed Action Construction	0.00	3,236.67	3,236.67	0.9868	0.00	3,261.33
Proposed Action Operation	N/A	2.00×10^{-4}	2.00×10^{-4}	0.00	0.00	2.10×10^{-4}
Alternative Action Construction	0.00	2,814.42	2,814.42	0.7387	0.00	2,830.23
Alternative Action Operation	N/A	2.80×10^{-4}	2.80×10^{-4}	0.00	0.00	3.00×10^{-4}

Source: CalEEMod Ver 3.1, see Appendix A for details

4.8.2.1 Alternative 1- Proposed Action

The proposed action, which would demolish four existing buildings and expand a parking lot with LID features, would result in the emission of GHG during construction. As shown in the table above, construction and operation would result in a contribution of less than a tenth of a percent of Monterey County's emissions for the year. Removal of trees would result in a long term loss of carbon sequestration of approximately 370 tons, however, planting new landscaping trees and bioswales would replace some of this lost storage over time depending on the species chosen. An increase in parking availability may encourage more people to drive in lieu of utilizing other transportation methods,

however, this number cannot be reasonably estimated, as estimation tools are designed to be used at the installation level. Due to the small scale of this project, impacts to greenhouse gas budgets under this alternative are less than significant.

4.8.2.2 Alternative 2- Conventional Parking Lot

Similar to the Proposed Action, GHG would be emitted during construction and removal of mature trees in the project footprint would permanently reduce carbon storage. Likewise, as this alternative also results in an increased availability of parking, more people may drive instead on utilizing other methods of transportation. Due to the small scale of this project, impacts to greenhouse gas budgets under this alternative are less than significant.

4.8.2.3 Alternative 3- No Action Alternative

Under the No Action Alternative, the parking lot would not be expanded and the existing buildings, landscaping, and trees would remain. No additional GHG's would be emitted and the existing carbon sinks would remain. Overtime, as the trees continue to grow, they would continue to sequester more carbon, and the lack of convenient parking could encourage people to seek other transportation methods.

4.8.2.4 Avoidance, Minimization, and/or Mitigation Measures

Due to the small scale of this project, impacts to greenhouse gas budgets under all alternatives are less than significant. Avoidance, minimization and mitigation measures to reduce emissions during the construction process are the same as the AMM for Air Resources (Section 4.4.2.4). The following additional BMPs are proposed to retain sequestration:

Greenhouse Gas (GHG) BMP 1: Retain mature trees where feasible.

GHG BMP 2: Consider the installation of bike racks to encourage the use of more carbon friendly methods of transportation.

4.9 HAZARDS AND HAZARDOUS MATERIALS

4.9.1 Affected Environment

Hazardous material used on the Presidio consists of regular household, commercial, and industrial substances such as: cleaning and disinfecting supplies; antifreeze and petroleum, oil, and lubricants; degreasers, compact fluorescent lights, and pesticides. However, since some of the buildings are historic, some may also contain lead based paints (LBP) and asbestos (ACM).

In addition, as a military facility, there is always a potential for Munitions and Explosives of Concern (MEC). MEC is defined as military munitions that might pose unique explosives safety risks, including (a) unexploded ordnance (UXO), as defined in Title 10 of the United States Code, section 101(e)(5); (b) discarded military munitions (DMM), as defined in 10 U.S.C. § 2710(e)(5), munitions constituents (e.g. TNT, RDX), as defined in 10 U.S.C. § 2701(e) (3), present in concentrations high enough to pose an explosive hazard. While the Presidio is an educational institution and there are no active ranges or weapons training conducted currently on the installation, the possibility of the existence of MEC cannot be completely discounted.

4.9.2 Environmental Consequences

Potential impacts to hazards and hazardous materials are considered significant if the Proposed Action would expose military or civilian personnel, family members, or the public to areas potentially containing hazardous materials without adequate protection; cause a spill or release of a hazardous substance; expose the environment or public to any hazardous conditions through release or disposal; adversely affect contaminated; cause the accidental release of hazardous materials; or generate either hazardous or acutely hazardous wastes, resulting in increased regulatory requirements over the long term.

Installation Restoration Program (IRP)

All IRP sites on the Presidio have been cleaned up with the exception of a closed landfill that has been capped to prevent exposure to the underlying soil. The cap is currently functioning as designed and the Proposed Action would not impact its functioning. Therefore, the Proposed Action or Alternatives would not result in exposure of persons to hazardous materials associated with any IRP sites.

Munitions and Explosives of Concern (MEC)

There are no Land Use Controls (LUCs) for MEC within the project area. However, given these areas are located on a military installation there may be a potential for MEC to be encountered. In the event that MEC is suspected or encountered, there shall be no attempt to disturb, remove, or destroy it, and any intrusive or ground-disturbing activities being conducted at the project shall cease. Local and installation authorities would be immediately notified to handle the situation.

4.9.2.1 Alternative 1- Proposed Action

Building insulation and pipe wrap within the walls of historic buildings have been known to contain ACM and structures may have been painted with LBP (USACE, 2006). Since this project would demolish four existing historic structures, it has the potential to generate or uncover hazardous materials. Additionally, since some ground disturbance would occur, impacts associated with MEC could occur. Building 281 was previously used as a repair shop for the motor pool, and therefore soil contamination may be present. Disturbance of the soil could expose workers to these contaminants or liberate them from the soil. Due to concerns for worker exposure to hazardous materials, hazardous material disposal, liberation of lead and asbestos, and the potential for soil contamination, mitigation is required to reduce impacts to less than significant under this alternative.

4.9.2.2 Alternative 2- Conventional Parking Lot

Impacts regarding the handling and exposure of hazardous materials is the same for the conventional parking lot as for the Proposed Action. Similarly, due to concerns for worker exposure to hazardous materials, hazardous material disposal, liberation of lead and asbestos, and the potential for soil contamination, mitigation is required to reduce impacts to less than significant under this alternative.

4.9.2.3 Alternative 3- No Action Alternative

Under the No Action Alternative, there are no proposed projects at the Presidio, and no new hazardous wastes would be generated. Therefore, there would be no impact related to hazardous materials under the No Action Alternative.

4.9.2.4 Avoidance, Minimization, and/or Mitigation Measures

Impacts due to the handling or discovery of hazardous materials can be minimized to less than significant with the following required mitigation measures. These required mitigation measures must be implemented under either build alternative.

Hazardous Materials (HM) Required Mitigation-1: A spill contingency and containment plan would be prepared and implemented in the event that hazardous materials are accidentally spilled during construction. Engineering controls that may be used during construction to protect water resources may include, but would not be limited to: hay bales and silt fencing. In addition, inspection and monitoring for compliance with the permit requirements would be implemented.

HM-2: In the event the that MEC is suspected or encountered, there shall be no attempt to disturb, remove, or destroy it, but shall cease any intrusive or ground-disturbing activities being conducted at the project and immediately notify the Presidio police or fire department so that appropriate personnel can be dispatched to address such MEC.

HM-3: Conduct surveys for the presence of ACM, LBP, PCBs, and other hazardous and toxic substances prior to demolition. Utilize licensed contractors to remove or encapsulate ACM, LBP, PCBs, and other hazardous and toxic substances during demolition in accordance with all federal, state, and local laws and regulations.

HM-4: Soils in the vicinity of Building 281 should be tested for potential contaminants. Should the soil be contaminated, it should be handled and disposed of in accordance with Presidio of Monterey procedures and all federal, state, and local laws and regulations.

HM-5: Conduct construction activities in accordance with applicable health and safety requirements (e.g., use of personal protective equipment, establishment of dedicated smoking areas, etc.) to minimize the potential for adverse effects to workers.

HM-6: All hazardous and toxic substances must be properly disposed of in accordance with Presidio of Monterey procedures all federal, state, and local laws and regulations.

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Affected Environment

With respect to developed areas, such as where the project would take place, the hydrology and water quality considers water inputs required for a project as well as the fate of water generated from the project, and indirectly how the projects mere existence affects connected water resources.

4.10.1.1 Potable Water

Potable water at the Presidio is supplied by the private water purveyor CalAm within the jurisdiction of the MPWMD and is under severe restriction for the Monterey Peninsula. CalAm has legal right to only a limited amount of water from both the Carmel Valley Groundwater Basin and the Seaside Area Subbasin. Onsite surface water is not a stable or reliable water source for the Presidio. Permanent surface water features, like streams and lakes, are not present.

Water usage at the Presidio has decreased largely as a result of conservation measures and water management programs. Annual water use from 1997 to 2010 has decreased substantially, about 50 percent from the late 1990s, from 290 afy to 147 afy (Presidio, 2013a). The baseline potable water use at the Garrison in 2007 was approximately 79 million gallons (Presidio, 2017c). Currently, the Presidio has achieved an approximately 30 percent reduction in potable water use compared to the 2007 baseline, based on a total potable water use of approximately 55 million gallons in 2016 (Presidio, 2017c). Further water use reductions are required to meet regulatory requirements to reduce potable water use by 36 percent by the year 2025, compared to a 2007 baseline. The Army has implemented many water saving measures at its facilities at the Presidio to accomplish this water use reduction and continues to look for ways to reduce water usage. Examples of past water saving measures include the installation of water-efficient garbage disposal systems, waterless urinals, high-efficiency clothes washers, and the retrofit of approximately 100 toilets with more water-efficient components (Presidio, 2013a).

4.10.1.2 Stormwater Runoff

This section analyzes the affected environment and the potential environmental consequences associated with stormwater runoff across the land, with regard to erosion and water quality, impacts to stormwater drainage systems are analyzed in the “Utilities” section. Stormwater runoff is largely collected by the existing Presidio storm drain system and discharged to the Pacific Ocean or the harbor in Monterey Bay (Presidio, 2013a). Some stormwater runoff drains off the Presidio and enters the storm drain systems of the cities of Pacific Grove and Monterey, which also discharge into the Pacific Ocean or Monterey Bay (Presidio, 2013a). The remainder escapes into nearby natural drainages. The nearest downstream watercourse has well-established woody vegetation with relatively steep channel banks and signs of incision and bank erosion. Stormwater from the Proposed Action area drains to the Monterey Harbor, adjacent to the Presidio, which is listed as an impaired water body because of high levels of arsenic, copper, PCBs, dissolved oxygen and sediment toxicity (SWRCB, 2015).

4.10.2 Environmental Consequences

Potential impacts related to water resources are considered significant if the Proposed Action would violate water quality standards or waste discharge requirements or substantially alter the drainage pattern of the site in a manner that would result in erosion, siltation, or flooding on or off site.

4.10.2.1 Alternative 1- Proposed Action

This project would demolish four existing buildings and expand the existing parking lot while incorporating LID features. Permeable pavement would be utilized throughout the

parking area, and bioswales would be implemented at low points on the parking lot or in between parking rows. Construction of this project would result in disturbed and exposed soils, which without proper management could result in increased erosion. This eroded soil could be carried by stormwater runoff into downstream receiving waters and thus degrade the water quality of those waterbodies. Compliance with the SWPPP, using BMPs, and implementation of Mitigation Measures GS-1 and GS-2 would minimize the potential for soil erosion from parking lot and bioswale ground disturbance. Construction would require the use of a water source for dust management purposes, cement mixing, landscaping establishment, etc. This water would have to come from existing entitlements or be brought in from elsewhere. Since the project is small in size, 1.3 acres, and short in duration, likely less than 3 months construction time based on similar projects (Eagle Bay Pavers, 2014), demands for water from the project should be negligible with regard to the water budget of the installation. Construction-related impacts related to water quality would therefore be less than significant with mitigation.

After completion of construction, implementation of this project would reduce the amount of stormwater runoff and reduce the amount of sediment and other pollutants in stormwater through biofiltration. This project would reduce the amount and rate of stormwater runoff into the nearby natural drainage thus preventing or slowing further degradation of the banks and channel. This project would also improve water quality of stormwater runoff discharging into the downstream channel as many pollutants would have been filtered out. This proposed project would result in a long-term beneficial impact related to stormwater quality. This project would have no impact related to potable water use at the Presidio.

In summary, impacts due to this alternative are less than significant with required mitigation during construction, and beneficial in the long term.

4.10.2.2 Alternative 2- Conventional Parking Lot

Construction of a conventional style parking lot would cause the same short term construction impacts as the Proposed Action however, it would pose more long term impacts. Runoff during the construction phase could be handled in the same manner as in the proposed action, as could water supply for the project. However, in the long term, the increase in the acreage of impervious surface would result in increased velocity of stormwater runoff and degraded quality over the long term. Construction of this alternative would continue to contribute to the sediment and pollutant load in Monterey Harbor, and contribute to its impairment.

In summary, impacts due to this alternative are less than significant with required mitigation during construction, and less than significant with mitigation in the long term.

4.10.2.3 Alternative 3- No Action Alternative

Under the No Action Alternative, there would be no change related to water supply or demand on the Presidio. Therefore, there would be no impact.

Under the no action alternative, no soil disturbance would take place in the ROI. Exposed soils would continue to be subjected to natural wind and water erosion, and soil conditions would be the same as current conditions. Therefore, there would be no short-term impacts related to erosion and sedimentation of downstream waterbodies

from soil disturbance associated with construction activities under the No Action Alternative. Rapid runoff from storm events would continue to cause erosion in the downstream waterbody and pollutants from existing roadways would continue to wash into the stormdrains contributing to poor water quality in the bay.

4.10.2.4 Avoidance, Minimization, and/or Mitigation Measures

Hydrology & Water (HW) Quality Required Mitigation 1: Disturbance of one acre or more requires enrollment under the Construction General Permit, which requires the preparation of a SWPPP and implementation of stormwater BMPs listed below:

Typical BMP's depending on the requirements of the permit might include, but are not limited to:

HW-2a: Schedule work to minimize soil disturbing activities during predicted rain events. Consider rescheduling activities for dry periods to minimize maintenance requirements.

HW-2b: Develop the sequencing and timetable for the start and completion of each item such as site clearing and grubbing, grading, excavation, paving, pouring foundations, installing utilities, etc., to minimize the active construction area.

HW-2c: Schedule major grading operations during dryer months when practical.

HW-2d: Stabilize inactive areas within 15 days from the cessation of soil-disturbing activities or one day prior to the onset of precipitation, whichever occurs first.

HW-2e: Monitor the weather forecast for storm events, which are storms that produce or are forecasted to produce at least 0.1 inch of precipitation within a 24-hour period. When rainfall is predicted, adjust the construction schedule to allow the implementation of soil stabilization, sediment controls, and, if applicable, sediment treatment controls on all disturbed areas prior to the onset of rain.

HW-2f: Preserve existing vegetation that provides erosion and sediment control benefits to the extent practicable, protect tree trunks, identify sensitive areas, and consider vegetation preservation when establishing staging areas.

HW-2g: Utilize a stabilizing compound such as hydraulic mulch, hydroseeding, cellulose fiber, or soil binders.

HW-2h: Install silt fencing around soil stockpiles and at the toe of steep slopes.

To conserve water resources on the installation and reduce impacts in the surrounding area, the following BMP is suggested:

Hydrology & Water (HW) Quality BMP-1: Over the long-term, to prevent increasing water demand on the installation, any landscaping planted should consist of USAG Presidio approved native species so it need not be irrigated.

4.11 NOISE

4.11.1 Affected Environment

The major sources of noise in the project area are motor vehicle traffic on regional roadways such as local roadways internal and adjacent to the Presidio. Additional noise sources include overhead aircraft, construction activities, and commercial and residential area activities. The Monterey Peninsula Airport is approximately three miles from the Presidio. Monterey Regional Airport's 2013 Airport Master Plan Existing and 2033 Noise Contours map indicates that the Presidio is over two miles outside the current and 2033 forecasted 65 CNEL noise contour, meaning the airport does not cause unreasonably high noise levels at the Presidio (Monterey Regional Airport District, 2015). However, because the Presidio is near the airport approach and departure zones, aircraft noise could be heard onsite.

Portions of the Presidio are subject to noise from State Route (SR) 68, which passes by the Upper Presidio by its western boundary. Noise contours developed by Caltrans show noise levels ranging from 50 to 75 dBA L_{eq} (one hour), depending on proximity to SR 68 (Presidio, 1994).

Noise sensitive receptors at the Presidio include barracks, child care center, administration and other office buildings, and classrooms. Residences in the cities of Monterey and Pacific Grove, adjacent to Presidio's outer boundaries, are also sensitive to noise levels originating on the installation. Sensitive receptors are located in proximity to the project site with the closest residential area at 35 feet from the project site, and school at 150 feet from the project site. The significance of potential noise effects is determined by the comparison of affected receptors to the acceptable compatible land uses. Noise impacts from construction activities would be considered significant if noise levels on the Presidio and extending off-post exceed levels allowed by the City of Monterey. These noise standards would be used as the threshold criteria.

4.11.2 Environmental Consequences

During construction, there would be temporary noise increases, with greater impacts occurring to sensitive receptors located closest to the project area. General construction noise would result from the use of equipment during construction. Activities would involve demolition of existing buildings and structures, ground clearing, excavation, grading, leveling, and construction of parking area and roads. Drilling or blasting would not be required. Construction noise would also include vehicular traffic due to worker vehicles, resulting in a temporary increase in vehicular noise. The maximum average noise levels generated during construction would typically range from 51 to 85 dBA at a distance of 50 feet (see Table 4-7).

Since the zone of the property receiving the noise is a residential district the maximum decibel noise level per the City of Monterey code is 60 Db (Monterey City Code Sect. 38-111).

4.11.2.1 Alternative 1- Proposed Action

Anticipated noise from the construction of the Proposed Action is summarized in Table 4-7. Construction of the project would result in noise emissions above typical residential community noise levels. Although construction noise would be intermittent and short

term in duration, and peak noise values would only be periodic within the construction timeframe, impacts would be potentially significant and mitigation would be required to reduce the impact to a less than significant level. Should noise generation exceed the thresholds of 10 decibels above the limit in one hour for one minute or a cumulative of 5 decibels above the limit for 5 minutes per hour, noise barriers will be used.

Table 4-7: Noise emissions from standard equipment

Source	Decibels emitted at 50 feet	Distance to receptor	Level at Receptor	Threshold exceeded?
Excavator	81	35 feet	84	No
Trucks	51	35 feet	54	No
Grader	85	35 feet	88	Yes
Dozer	82	35 feet	85	Yes
Air compressor	78	35 feet	81	No
Scraper	84	35 feet	87	Yes

Source: Decibels retrieved from FHWA noise tables (2017), distances calculated using Google Earth Pro ver. 7.1.5.155, dB at receptor calculated using inverse square law

4.11.2.2 Alternative 2- Conventional Parking Lot

Construction of a conventional parking lot hosts the same noise impacts as construction of the proposed action. Although construction noise would be intermittent and short term in duration, and peak noise values would only be periodic within the construction timeframe, impacts would be potentially significant and mitigation would be required to reduce the impact to a less than significant level. Should noise generation exceed the thresholds of 10 decibels above the limit in one hour for one minute or a cumulative of 5 decibels above the limit for 5 minutes per hour, noise barriers will be used.

4.11.2.3 Alternative 3- No Action Alternative

Under the No Action Alternative, buildings would not be demolished and the existing parking area would remain in its current form. As a result, no new generation of noise would result and there would be no impact.

4.11.2.4 Avoidance, Minimization, and/or Mitigation Measures

The following mitigation measures are required to reduce the level of impact from the construction alternatives to below the level of significance.

Noise Required Mitigation N-1: The following construction-related noise measures shall be implemented during the proposed action:

- The construction contractor shall ensure that all equipment has the manufacturers' recommended noise abatement measures, such as mufflers, engine enclosures, and engine vibration isolators, intact and operational. Further, all construction equipment shall be inspected at periodic intervals to ensure proper maintenance and presence of noise control devices.
- Construction activities shall be limited to daytime hours (8:00 A.M. to 5:00 P.M.). In addition, the POM currently promotes quiet hours during the normal workweek

for some construction projects. This could include quiet hours between 6:00 A.M. and 10:00 A.M. on specific workdays, if requested by affected staff.

- Local neighborhoods shall be notified of the project, and signs should be posted that provide a phone number to call to register complaints about construction-related noise.

N-2: In the event of exceedances beyond allowable peaks, or excessive complaints use temporary noise barriers at project boundary.

4.12 UTILITIES AND SERVICE SYSTEMS

4.12.1 Affected Environment

While the entire host of typical utility services exists on the Presidio: wastewater, stormwater, solid waste, energy, and communications, only those with the potential for impact by the Proposed Action or alternatives would be discussed in this section. It is anticipated that only stormwater, energy and solid waste would be affected by the project. As the Proposed Action and Alternatives would not utilize wastewater or communications systems. These actions would not generate atypical wastewater such as industrial or agricultural effluent. All wastewater generated during the construction of the project and during the life of the project is expected to be surface runoff or percolation. Handling of surface runoff or percolation generated from the project is addressed in section 4.10. Since no water associated with this project would be directed to wastewater facilities, this project would not result in the construction of new or expansion of existing wastewater treatment facilities. Further, none of the actions in this project would have any effect on communications services on the Presidio.

4.12.1.1 Stormwater Drains

Stormwater runoff is collected by the existing Presidio storm drain system and discharged to the Monterey Harbor, which is an impaired water body under the CWA section 303(d) (Presidio, 2013a). The Monterey Bay is designated as a National Marine Sanctuary and is the largest of thirteen marine sanctuaries administered by the United States Department of Commerce's NOAA with approximately 6,092 square miles (MBNMS, 2008). According to the Monterey Bay National Marine Sanctuary's (MBNMS) 2009 Condition Report, the MBNMS's offshore environment and nearshore environment are primarily in Fair to Good conditions, but the estuarine environment has been determined to be impaired by human activities (NOAA, 2009). Though many small estuaries occur along the central California coastline, only Elkhorn Slough is located inside the boundaries of the MBNMS. For the MBNMS's estuarine environment, the water quality, habitat quality, and the quality of living resources are the aspects most affected by hydrological alterations and the introduction of pollutants from agricultural and urban sources (NOAA, 2009). Some stormwater runoff drains off the Presidio and enters the storm drain systems of the cities of Pacific Grove and Monterey, which also discharge into the Monterey Bay.

Stormwater runoff from Presidio is currently discharged to Monterey Bay through two natural stream channels and five storm drains. In addition to the main drainage channels and storm drains, a series of smaller storm drains serve specific portions of the base. These smaller drains collect stormwater and discharge to larger drains

eventually flowing into the Presidio's main storm drains previously described above. Several types of piping are use including vitrified clay, steel, concrete, and corrugated steel.

4.12.1.2 Solid Waste

The Monterey City Disposal Service collects solid waste and recyclable materials at the Presidio. The waste is sent to the landfill at the Monterey Regional Waste Management District (MRWMD) approximately two miles north of Marina. Recyclable materials are taken to the Monterey City Disposal Materials Recovery Facility (MRWMD, 2017). At current rates of disposal, the landfill is projected to have 100 years of capacity (MRWMD, 2018).

4.12.1.3 Energy

Pacific Gas and Electric Company provides electricity and natural gas to the Presidio.

4.12.2 Environmental Consequences

Potential impacts related to utilities are considered significant if the Proposed Action would impair the ability of the Army to maintain wastewater or stormwater infrastructure; provide solid waste, or energy services; or conflict with existing Federal, state, or local statutes or regulations.

4.12.2.1 Alternative 1- Proposed Action

The proposed project would demolish some existing buildings and upgrade and enlarge an existing parking lot. Since the Proposed Action utilizes LID features, the intent of the project is to have all run off generated percolate into the underlying ground via permeable pavement or bioswales. Addition of an overflow drain, or overland channel would direct excess stormwater, from rare very large events such as atmospheric rivers, to the existing stormwater system. However, since in total the amount of stormwater being directed to existing systems will be reduced, there would not be any adverse effect on public services or utilities servicing the Presidio Installation. In fact, it is expected that this project would result in a beneficial impact for stormwater conveyance as it would alleviate some of the load on the system.

The Proposed Action would generate solid waste from building demolition, however, these amounts would be generated one time and not contribute permanently to increases in solid waste streams. The receiving landfill is not currently impacted for capacity.

The Proposed Action would need to tie into existing electrical systems to provide lighting for the parking lot, however, utilization of energy efficient systems, and in consideration of the project's small size, these effects are expected to be negligible.

The Proposed Action may include additions to, for the initial establishment of bioswales and landscaping. However, these actions would not increase population or induce population growth that could result in an increase in a permanent increase in stormwater runoff, solid waste production, or energy consumption.

Therefore, under Alternative 1 – Proposed Action, impacts on public services and utilities would be less than significant and mitigation would not be required.

4.12.2.2 Alternative 2- Conventional Parking Lot

Short term impacts under this alternative are equivalent to the short term impacts under the proposed action. Wastes generated from demolition would still be generated, and existing irrigation systems would still need to be used for any landscaping conducted. Electrical lines would likewise need to be connected to the existing system to provide lighting on the new parking lot.

Stormwater runoff from this project would need to be directed to the existing stormwater conveyance system. Increases of 0.25 acres in impervious pavement would increase the load on the existing system proportionally. However, due to the small size of the proposed project area, this impact is not significant.

Therefore under Alternative 2- impacts on public services and utilities would be less than significant.

4.12.2.3 Alternative 3- No Action Alternative

Under the No Action Alternative, the existing parking lot would remain, as would the four buildings proposed for demolition. As a result, there would be no solid waste generation from demolition of the buildings or existing parking lot. Energy demands at the Presidio would remain the same. Likewise, there would be no increase in existing stormwater runoff production. However, under this alternative, LID features would not be installed on the existing parking lot. As a result, the existing load on the stormwater system would remain, and the beneficial impact would not occur.

4.12.2.4 Avoidance, Minimization, and/or Mitigation Measures

Since impacts to this resource category are not considered significant, mitigation is not required. However, the following BMP is suggested:

Utility and Service Systems BMP-1: Use energy efficient lighting where possible.

5. Cumulative Impacts

CEQ guidelines on the analysis of cumulative impacts require an analysis of the impacts of an action in the context of all aggregated past, present, and reasonably foreseeable future actions, whether conducted by Federal, State, local or private entities. CEQ requires that this analysis be conducted through the lens of the direct and indirect impacts on the resource up to the extent where those effects can be meaningfully evaluated without regard to political or administrative physical boundaries or life of project temporal boundaries.

5.1 PAST, PRESENT, AND REASONABLY FORESEEABLE ACTIONS

5.1.1 Construction Projects on the Presidio

The following potential construction projects that would occur on the Presidio are considered in this cumulative impact analysis

Building Complex Phase I

Construction of three buildings and three parking lots. Support facilities would include utilities, exterior lighting, drainage, and a surveillance system. Building and parking lot construction is nearing completion. This project also includes demolition of one barracks building

Building 829 Stucco Replacement

This project involves demolition of the exterior walls from B829 (whole building), investigating the extent of mold damage, potential removal of interior walls based on mold damage, and reconstruction of all demolished area. The project would be completed in phases, with each phase addressing approximately 25 percent of these buildings at a time.

Maintenance and Small Construction Projects

Potential minor maintenance and small construction projects anticipated include building renovations, road repairs, storm drain repairs, erosion repairs, sidewalk construction, construction of ADA parking, landscaping and xeriscaping.

5.1.2 Construction Projects by Others

According to the CEQA database provided by Monterey County, the following projects are reasonably certain to occur or have occurred:

Lower Presidio Historic Park Improvement- County of Monterey- Completed 2017- Added pathways, fencing, and interpretive signs. Planned projects include adding more picnic benches and increasing ADA accessibility.

Cannery Row Streetscape Plan- City of Monterey- Planning phases- will install permeable pavements, energy efficient lighting, seeks to reduce traffic congestion and maintain area’s character.

5.2 RESOURCE ANALYSIS

The analysis of cumulative impacts focuses on the resources evaluated in this Draft EA. For other resource topics dismissed in Table 4-1, the Proposed Action would result in insignificant to no impacts; therefore, the incremental impacts of the Proposed Action in combination with other projects listed above would not elevate to a cumulative level of significance for those resources.

5.2.1 Aesthetics

Future projects at the Presidio include several proposed renovations to existing buildings as well as demolitions. In addition, it is likely that mature trees would have to be removed on occasion. Provided all construction projects adhere to the Installation Design Guide (IDG), and the Programmatic Agreement when in the Historic District, the overall visual character of the installation would be maintained. Although some of the past, present and future projects listed above may have potential impacts on visual resources at the installation level, the Proposed Action would not contribute to cumulative visual resource impacts at larger scales.

5.2.2 Air Quality

Air quality impacts associated with the Proposed Action would be localized around the project areas and would be temporary, limited to the construction period and periodic maintenance activities, or short-term, limited to periodic emissions from truck access along dirt roads. Construction-related emissions would contribute minimally to air quality impacts in the region and would not result in violations of federal air quality standards. Other projects implemented at the Presidio or in the region during the same construction period as one or more of the projects associated with the Proposed Action would also contribute to emissions in the local area, but cumulative impacts would not be expected to adversely affect regional air quality. Many of the other projects listed above would result in similar types of emissions and air quality impacts as the Proposed Action, which would be minor and primarily temporary. Emissions would be expected to dissipate within the vicinity of the work area and would not create a local hazard. Emission control and reduction measures would be implemented during all projects. Cumulative impacts on local and regional air quality from the Proposed Action and related projects listed above would be minor.

5.2.3 Biological Resources

In conjunction with other actions occurring in the region, the Proposed Action would have a less-than-significant effect on vegetation and wildlife at the installation with the implementation of appropriate avoidance and minimization measures as included in the 2013 BO and this Draft EA. Removal or replacement of Monterey pine trees would be minimized during construction at the selected sites compared to other available sites on the installation. Replacement of removed trees should be performed when possible with an equivalent native species to reduce long term impacts.

Although there would be an initial cumulative effect on vegetation and habitat from the Proposed Action, incorporation of avoidance and minimization measures would reduce the effects to less than significant. Other ongoing and future construction projects would be required to comply with applicable requirements of the FWS BO for the Presidio's Real Property Master Plan, including those related to Yadon's Piperia, Monterey pine

forest, and nesting migratory birds. Off of Federal land, removal of native tree species requires a permit, which often includes replacing the tree at a minimum of 1:1 ratio, reducing the likelihood that native trees would be removed. Further, in the context of the community, a shift away from impervious surfaces is underway. Provided consideration is always granted for tree removal, or conversion to hardscape, no significant cumulative effects from the Proposed Action on vegetation and wildlife are expected.

5.2.4 Cultural Resources

Implementation of the Proposed Action with mitigation would have a less than significant impact on cultural resources. At this time, there are no identified cumulative impacts to the Presidio of Monterey Historic District. Other ongoing and future construction projects in and around the area could uncover previously unknown or affect the integrity of known cultural or historic resources. The U.S. Army would be responsible for mitigating impacts to cultural resources. Potential impacts to any cultural resources would be addressed in accordance to Section 106 of the NHPA, the ICRMP SOPs, and the 1993 PA. As the installation has been well preserved in some places, future actions should focus on restoring buildings where possible. Continual evaluation of each cultural resource affected by future projects both for its own individual value as well as its contributory value to a larger landscape would ensure potential impacts on cultural resources from the Proposed Action would be less than significant.

5.2.5 Geology & Soils

The Proposed Action would have potential for impacts on geology and soils, such as soil erosion resulting from earth moving activities. However, future projects requiring over one acre of ground disturbance would include BMPs to reduce potential erosion effects, and construction of new structures would include engineering controls to reduce potential seismic damages. Cumulative impacts on geologic and soil resources resulting from the Proposed Action would not be significant.

5.2.6 Greenhouse Gas Emissions and Climate Change

Greenhouse gas emissions generated as a result of the Proposed Action would cause an incremental increase in overall greenhouse gasses, however, this amount is well within the County and State greenhouse gas budget. Provided carbon sinks continue to be preserved and propagated when possible, this incremental impact is not globally significant.

5.2.7 Hazards and Hazardous Materials

Demolition of the proposed buildings could expose construction workers and others to ACM and/or LBP. Proper hazardous materials handling, worker safety precautions, and hazardous waste management practices would apply to all project activities. This includes compliance with the POM Installation Asbestos Management Plan, the POM Installation LBP Hazard Management Plan, the Federal Hazardous Materials Transportation Law of 1988, NESHAP, OSHA, MBARD, local, state and federal applicable regulations, as well as other relevant USEPA regulations under the RCRA pertaining to the proper handling, storage, use and transportation of hazardous materials.

The management of hazardous materials and disposal of hazardous substances in accordance with these requirements would minimize effects to less-than-significant

levels. Adverse cumulative effects would occur due to the need for disposal of construction materials, including ACMs from demolition activities when combined with other projects with similar construction materials disposal needs. With compliance with applicable regulations, the Proposed Action is not expected to contribute to a significant cumulative effect related to hazards and hazardous materials. Ultimately, removal of these materials from places where people frequent to an appropriate facility would result in a net benefit.

5.2.8 Hydrology and Water Quality

The Proposed Action would result in a long-term beneficial impact to water quality by capturing and improving stormwater quality through biofiltration. While the Proposed Action is expected to have beneficial impacts on water resources, construction would have the potential to cause negative water quality. Potential water quality impacts resulting from erosion during grading and construction activities would be controlled through the use of appropriate erosion control BMPs, where required. In addition, soil conservation and stormwater management regulations require that appropriate BMPs be used to minimize/eliminate site-specific erosion concerns. Therefore, the Proposed Action's contribution would be cumulatively beneficial as in the long run less runoff would be created. In the short term, negative effects on water resources would be mitigated to a level of insignificant impact as per NPDES permitting requirements, even when considered with other projects.

5.2.9 Noise

The Proposed Action would result in construction noise that exceeds applicable standards, and mitigation is required to reduce the impact to a less than significant level. Cumulative projects listed above would also result in construction noise, and several of the identified projects could feasibly be constructed concurrent with Proposed Action, thus intensifying this cumulative effect. However, ongoing and future construction projects would be required to limit construction activities to daytime hours and implement other mitigation measures, where appropriate. In addition, construction noise would be temporary, and the Proposed Action would not contribute to a cumulative increase in noise in the long-term. As such, cumulative noise-related impacts are anticipated to be less than significant.

5.2.10 Traffic and Transportation

The Proposed Action would result in minor negative short term impacts to traffic due to increased construction traffic, road diversions, and temporary gate closures. However, these traffic impacts would be restricted to the installation. In the long-term, the proposed action would likely result in a positive net benefit to traffic circulation as vehicular traffic would be less likely to accumulate on the installation causing delays in town. Installation traffic often contributes measurably to the traffic of the town it is located in, therefore, reducing traffic congestion on the installation will likely

5.2.11 Utilities and Service Systems

Past, present, and future projects on the Presidio, given considerations for energy and water use reductions and replacement of facilities, should not result in cumulative effects on public utilities and services. The installation would continue to work with utility agencies, such as Pacific Gas and Electric (PG&E), MRWPCA, Monterey City Disposal

Service, and MPWMD, to coordinate the relocation of, installation of new, or interruptions to utility and public services. Furthermore, the Proposed Action would result in an alleviation of load on stormwater and electrical infrastructure as more stormwater would be retained and utilized onsite and more efficient lighting is installed. Therefore the Proposed Action is not expected to result in significant adverse cumulative effects on utility or service systems.

6. Irreversible or Irretrievable Commitments of Resources

NEPA Council on Environmental Quality regulations require environmental analyses to identify "...any irreversible and irretrievable commitments of resources that would be involved in the proposal should it be implemented" (40 CFR Section 1502.16). Irreversible effects are those that describe a loss of future options and primarily result from the destruction of cultural resources, the use of non-renewable resources, or harvest of minerals that cannot be replaced within a reasonable timeframe. Irretrievable impacts are those which pertain to a loss of production for a period of time.

The following irreversible actions would result through the completion of the Proposed Action: demolition of four historic buildings, conversion of fossil fuels to carbon dioxide to provide energy for the project, and topsoil loss associated with conversion to hardscape. The demolished buildings would no longer exist, nor contribute to the historic district on the Presidio. Fossil fuels and topsoil eventually recover, however because of the timescale the loss is effectively permanent. Fossil fuels take millions of years to form (J.M.K.C. Donev et al., 2018), and the time to recover topsoil is generally 100 years to accrue one inch of topsoil depending on climate and precipitation(NRCS, 2018).

The following Irretrievable impacts would result from the completion of the Proposed Action or Alternatives: use of materials for the construction of the project, and loss of mature trees. Aggregate is generally recyclable, therefore, at the end of the project life these materials could be reused, however during the life of the project all materials used would be unavailable for other uses. If any mature trees are lost during the completion of this project, they would be unavailable as habitat for species that depend on them or to people as a source of shade or as a carbon sink. Tree species native to the area take an average of 40 years to grow to maturity with equivalent habitat value to the existing trees (Esser, 1994).

7. Findings and Conclusions

7.1 FINDINGS

After an initial examination of all resource areas, it was determined that the Proposed Action would have no or insignificant impacts on agricultural resources, environmental justice, land use, population and housing, recreation, socioeconomics, and traffic & transportation. Upon further analysis, it was determined that the Proposed Action would not have significant impacts on aesthetics, greenhouse gasses, geology & soils, or utilities and service systems. No mitigation related to these issue areas would be required. Impacts to biological resources are less than significant, however conservation measures identified must be incorporated into the action to maintain compliance with the existing BO. Impacts to cultural resources, hazards and hazardous materials, hydrology and water quality, and noise would be reduced to less than significant with the incorporation of required mitigation.

Table 7-1: Summary of Impacts by Alternative

	Proposed Action (Alternative 1) Parking lot with LID features	Alternative 2- Conventional Parking lot	Alternative 3- No Action Alternative
Aesthetics	Beneficial Impact	Less than significant	No Impact
Air Quality	Less than significant with mitigation	Less than significant with mitigation	No Impact
Agricultural Resources	No Impact	No Impact	No Impact
Biological Resources	Less than significant with measures for other compliance	Less than significant with measures for other compliance	No Impact
Cultural Resources	Less than significant with mitigation	Less than significant with mitigation	No Impact
Environmental Justice	No Impact	No Impact	No Impact
Geology and Soils	Less than significant	Less than significant	No Impact
Greenhouse Gasses	Less than significant	Less than significant	No Impact
Hydrology and Water Quality	Less than significant with mitigation then Beneficial Impact	Less than significant with mitigation	Less than significant

	Proposed Action (Alternative 1) Parking lot with LID features	Alternative 2- Conventional Parking lot	Alternative 3- No Action Alternative
Land Use and Planning	No Impact	No Impact	No Impact
Mineral Resources	No Impact	No Impact	No Impact
Noise	Less than significant with mitigation	Less than significant with mitigation	No Impact
Population and Housing	No Impact	No Impact	No Impact
Public Services	No Impact	No Impact	No Impact
Recreation	No Impact	No Impact	No Impact
Socioeconomics	No Impact	No Impact	No Impact
Traffic and Transportation	Beneficial Impact	No Impact	No Impact
Utilities and Service Systems	Beneficial Impact	Less than significant	No Impact

7.2 CONCLUSIONS

Based on the environmental analyses contained in this Draft EA, it was determined that implementation of the Proposed Action with identified mitigation measures would not have any significant direct, indirect, or cumulative impacts on the human environment. Because no significant impacts would result from implementing the Proposed Action, an environmental impact statement is not required and will not be prepared. These EA findings and conclusions are the basis for the Finding of No Significant Impact.

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11. ppendix A- Public & Outside Agency Involvement Record

12. Appendix B- Air Quality Calculations from CalEEMod

13. Appendix C- Soil Inventory Report from NRCS