CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

PROJECT TITLE: Monterey MGP Substation Remediation - Soil Feasibility Study and Remedial Action Plan		**PROJECT CODE:** 200280
PROJECT ADDRESS: 498 Del Monte Avenue	**CITY:** Monterey	**COUNTY:** Monterey
PROJECT SPONSOR: Pacific Gas and Electric Company 3401 Crow Canyon Rd San Ramon, California 94583	**CONTACT:** Melitta Rorty	**PHONE:** (925) 415-6328

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:

☐ Initial Permit Issuance ☐ Permit Renewal ☐ Permit Modification ☐ Closure Plan
☐ Removal Action Workplan ☒ Remedial Action Plan ☐ Interim Removal ☐ Regulations
☐ Other (specify):

STATUTORY AUTHORITY:

☐ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):

DTSC PROGRAM/ ADDRESS: 700 Heinz Avenue, Berkeley, CA 94710	**CONTACT:** Sagar Bhatt	**PHONE:** (510) 540-3844

Project Description

The Department of Toxic Substances Control (DTSC) is proposing to approve a Feasibility Study/Remedial Action Plan (FS/RAP) and Remedial Design and Implementation Plan (RDIP) for the active electrical substation area of the Pacific Gas and Electric Company (PG&E) Former Monterey -1 Manufactured Gas Plant (MGP) at 498 Del Monte Avenue in Monterey, California (Site) pursuant to regulatory authority granted under Chapter 6.8, Division 20, sections 25323.1 and 25356.1, California Health and Safety Code (H&SC).

Preparation and approval of the FS/RAP and RDIP is pursuant to the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended by the Superfund Amendments and Reauthorization Act of 1986; the National Oil and Hazardous Substances Pollution Contingency Plan in Title 40 of the Code of Federal Regulations, Part 300; and Division 20, Chapter 6.8 of the California Health and Safety Code (H&SC). DTSC is the lead regulatory oversight agency for the investigation and remediation of contamination at the Site.

The proposed project activities include the following:

- Construction of a second access gate and driveway along Figueroa Street, north of the intersection of Figueroa and East Franklin streets.
- Expansion (widening) of the existing access gate and driveway along Figueroa Street.
- Advancement of approximately 123 soil borings for site characterization.
- Demolition of existing surface and subsurface Site features including compacted gravel, concrete foundations, vaults, slabs, shed with overhang (carport), concrete block wall, and utilities (known and unknown). The total volumes of existing pavement, concrete, and other building demolition debris within the focused excavation/remediation area are estimated at 400, 600, and 40 cubic yards, respectively. Destruction of the two existing groundwater monitoring wells

- Excavation and offsite disposal of impacted soil (up to 10,000 cubic yards [14,000 tons] estimated)
- Discharge or offsite disposal of treated wastewater (up to 100,000 gallons estimated)
- Import and backfill of clean material (up to 10,000 cubic yards [14,000 tons] estimated)
- Site drainage restoration
- Installation of two replacement groundwater monitoring wells
- Installation of temporary soil gas monitoring probes
- Recordation of a Land Use Covenant (LUC) with institutional controls designed to be protective of future Site users and workers
- Preparation of a Soil Management Plan to manage residual concentrations of Site contaminants of concern (COCs)

Background

The Project Site is in a mixed business and residential area with Del Monte Avenue to the north, Franklin Street to the south, Figueroa Street to the east, and the City of Monterey Sports Complex to the west (Figure 1). PG&E purchased the MGP property in 1927, and later sold all portions except a 1-acre parcel that contains an unmanned substation and gas regulator facility, both of which are operated by PG&E. The remediation project is proposed for the 0.6-acre electrical substation (Figure 2). Photographs of the Project Site are provided in Figure 3.

The Project Site is approximately 600 feet from the Monterey Bay shoreline, topographically flat, with a slight grade to allow drainage. The ground elevation is approximately 9 feet above mean sea level (12 to 13 feet relative to the North American Vertical Datum of 1988 ([NAVD88]). The majority of the Project Site is paved or covered with impermeable surfaces. The only vegetation at the Project Site is located around the north, east, and south perimeter of the property, adjacent to the sidewalk areas, and consists of vining plants growing up along the fence and structure walls, a few shrubs and small trees, and numerous planter boxes and pots containing ornamental plants. The Project Site is zoned as public/semi-public, and land use in the vicinity of the Site is mostly commercial and residential.

The remedial actions described in the FS/RAP address soil containing COCs within the electrical substation portion of the PG&E property. These COCs consist of polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPH), arsenic, lead, and polychlorinated biphenyls (PCBs). Impacted soils in this area were inaccessible for remediation during previous removal actions due to active substation operations. In 2021, PG&E will temporarily de-energize the electrical substation and remove the above-grade equipment to prepare for installation of an upgraded electrical substation. The selected remedy would be performed while the substation is inactive.

Selection of Site Remedy

As specified in the FS/RAP, the following remedial action objectives apply to the site:

- Protect human health by limiting exposures to the COCs present at concentrations exceeding cleanup goals via inhalation, dermal contact, and ingestion.
- Reduce potential health risks associated with the COCs in soil to a level that is acceptable for future commercial/industrial development with minimal land use restrictions.
- Reduce the migration of COCs into groundwater and nearby surface water to protect their current and potential beneficial uses to the extent feasible and practicable.

The FS/RAP established the numerical, chemical-specific cleanup goals that will achieve these objectives, and be consistent with the planned use of the Project Site. These cleanup goals are presented in Table PD-1, below.

TABLE PD-1: Chemical-Specific Cleanup Goals

Chemical	Cleanup Goal (milligrams per kilogram)
Carcinogenic PAHs (in benzo(a)pyrene equivalent)	0.9
Naphthalene	6.5
Arsenic	10
Lead	320

PCBs	0.58
TPH as diesel	1,100

The remedy selected in the FS/RAP consists of the following main components:

- Excavation of impacted soil and off-Site disposal at a licensed landfill. Up to approximately 10,000 cubic yards [14,000 tons] of material would be excavated (exact volume to be determined based on pre-excavation characterization).
- Backfill of imported clean material to existing grade (Up to approximately 10,000 cubic yards [14,000 tons])
- Recordation of a LUC for the PG&E property with institutional controls designed to be protective of future Site users and workers
- Preparation of a Soil Management Plan to manage residual concentrations of Site COCs

The RDIP (ERM 2020b) details the procedures that would be employed during these remediation activities, including specific plans designed for the protection of human health and safety and the environment during remedy implementation. The Project duration is 7 months, with excavation/disposal and backfill activities anticipated to take approximately 5 months to complete.

Key project elements are shown on Figure 4. The proposed cleanup remedy involves the following main tasks:

- To support the field activities, installation of temporary facilities, including an office trailer and separate sanitary and wash facilities, at the Project Site. PG&E plans to meet the energy demands fulfilled by the former electrical substation with temporary off-site equipment until the new substation is operational.
- Advancement of approximately 123, 2-inch diameter soil borings to 15 feet below ground surface for evaluation of the extent of contamination and waste characterization (including potential PCB waste characterization in coordination with the Region 9 US Environmental Protection Agency [EPA]).
- Demolition of existing surface and subsurface Site features including compacted gravel, concrete foundations, vaults, slabs, shed with overhang, concrete block wall, and utilities (known and unknown). A hazardous materials survey will be completed pre-demolition to confirm the presence of suspect asbestos-containing material or other hazardous material, such as lead-based paint and PCB caulking. The total volumes of existing pavement, concrete, and other building demo debris within the focused excavation/remediation area are estimated at 400, 600, and 40 cubic yards, respectively.
- Construction of a second access point (driveway) along Figueroa Street, pending approval from the City of Monterey.
- Expansion (widening) of the existing access gate along Figueroa Street, pending approval from the City of Monterey.
- Destruction of the two existing groundwater monitoring wells in accordance with the Monterey County guidelines.
- Excavation to a depth of approximately 7 feet below ground surface (bgs) on average across the Site using appropriate construction equipment (may include excavator, backhoe, bulldozer, jack hammer, or grader). Excavated material will be either direct loaded onto dump trucks or stockpiled, if appropriate. For protection of existing perimeter walls and adjacent buildings, shoring and slot trenching will be considered. Up to approximately 10,000 cubic yards (14,000 tons) of material would be excavated (exact volume to be determined based on pre-excavation characterization). Excavating this soil would affect approximately 26,130 square feet of the ground surface. Excavation depths will be determined by the pre-excavation characterization analytical results, geotechnical investigation data, and by requirements to maintain structural integrity of on-Site structures.
- Because the depth to groundwater ranges from 6.5 to 8 feet bgs, dewatering would likely be required for deeper excavations. Dewatering would be performed in accordance with a Dewatering Plan prepared by the Contractor; this plan, would be designed to remove only the amount of groundwater necessary to clear the Site of standing water during excavation (by approximately 1 foot). Groundwater extracted during dewatering (up to approximately 100,000 gallons) would be containerized in a storage tank within secondary containment, and either disposed of offsite or treated and discharged under permit to the City's sanitary

sewer collection system, pending approval from Monterey One Water. Up to 30 round trips by vacuum truck would be required to off-haul the extracted groundwater if unable to discharge under permit.

- Backfill of excavation with clean, imported material. If excavated material is found to meet the Site cleanup goals, material may be segregated and re-used as backfill. Backfill would be performed in a manner consistent with the design requirements of the proposed new substation. Backfill materials would meet the standards and ordinances of the state and local governing authorities. Backfill material would be inert; non-expansive; free of organic matter, debris, rubble, and other deleterious substances; and of such quality that it will compact thoroughly without excessive voids when watered and rolled. Remediation activities would involve the transportation of up to approximately 10,000 cubic yards of imported clean fill. Up to approximately 690 round trips by dump trucks would be required to transport this clean backfill onto the Project Site; the actual number of truck trips would be reduced if excavated materials are found to be suitable for use as backfill. The grade would be restored to roughly pre-excavation conditions.
- Transportation and disposal/recycling of excavated soil, concrete, asphalt, and other debris offsite to appropriate facilities (Table PD-2) based on waste characterization results and facility licensing. Based on the limited existing Site data, excavated soil is expected to be predominantly non-hazardous waste. Up to approximately 2,000 cubic yards (or 20 percent) of excavated impacted soil is assumed to be characterized as non-Resource Conservation and Recovery Act (non-RCRA) hazardous waste, and the remaining 8,000 cubic yards (or 80 percent) of excavated material would be considered non-hazardous waste. These excavation activities would require approximately 1,400 round trips by haul trucks, as a conservative estimate, to transport materials offsite and import material onsite (an average of three to four round trips per hour); this level of Project-related traffic would occur over the course of approximately 5 months. Traffic flow to and from the Project Site is shown on Figure 5.

TABLE PD-2: Facilities to be Used for Disposal/Recycling of Remediation Wastes

Facility or Operator Name	*Types of Waste Accepted*			*City*	*State*
	NH	CA-H	RCRA-H		
Clean Harbors Buttonwillow Landfill (~190 miles from site)	X	X	X	Buttonwillow	California
Waste Management Kettleman Hills (~150 miles from site)	X	X	X	Kettleman City	California
Waste Management Altamont Landfill (~110 miles from site)	X			Livermore	California
Kirby Canyon Landfill (~60 miles from site)	X			Morgan Hill	California
Ox Mountain Landfill (~100 miles from site)	X			Half Moon Bay	California

NH = Non-Hazardous
CA-H = California-Hazardous, exceptions for certain types of contaminants may apply
RCRA-H = RCRA-Hazardous

Note: Each of these facilities is licensed to accept certain types of materials. Prior to selecting the appropriate disposal/recycling facility, the remediation wastes in question will be analyzed to determine which facility(ies) from the above list would be suitably licensed to accept those wastes.

- After completion of backfilling, installation of two replacement groundwater monitoring wells and soil gas monitoring probes (exact number of probes to be determined based on encountered Site conditions during remediation). Upon completion, soil gas samples would be collected use as part of the post-remediation human health risk assessment.
- Restoration of drainage system (inlet and ditch) to match pre-excavation conditions.
- Recordation of Institutional controls. Institutional controls are legal documents such as LUCs that would govern future use of the property, restricted activities, operation and maintenance activities (as applicable), and monitoring requirements, as appropriate. The LUC would prohibit certain uses of a site without prior approval from DTSC, and would require annual inspections and 5-year reviews and reporting to evaluate the effectiveness of the remedy to protect human health and the environment. LUCs protect site occupants and the environment by limiting activities that could result in: 1) releases of contaminated materials; or 2)

unacceptable exposures to chemicals remaining in place. The Project Site would be covered under an LUC that restricts land use to commercial/industrial purposes and prohibits the following land uses: residences (including factory-built or mobile-home facilities), hospitals, public or private schools for persons less than 18 years of age, and day-care centers for children.

These proposed remediation activities are commonly employed at remediation sites. These activities are fully described in the RDIP, which includes a 30% design. A 100% design will be developed pending the additional site characterization sampling and evaluation of geotechnical data.

Project Schedule

As described above, the proposed Project involves short-term construction activities. For the purpose of the impact evaluations, this Initial Study assumes the following regarding the cleanup actions evaluated herein:

- Project duration is approximately 7 months of continuous work to complete, with excavation and backfill activities spanning 5 of the 7 months;
- Project is expected to start in mid-2021, pending de-energization and transition from PG&E Electrical Operations (Substation management team);
- Completion is expected to occur in late 2021 and transitioned back to PG&E Electrical Operations for construction of the upgraded substation facility (not covered by this document or the documents referenced here).

Project Controls

Standard Project controls would be applied as needed during implementation of cleanup activities to reduce the potential for impacts to 1) Site workers or nearby Site tenants due to impaired air or water quality, hazards, noise, and traffic; and 2) the environment in general, including air quality, surface soils (i.e., prevention of erosion), surface water, groundwater quality, and cultural resources. These Project controls are summarized in the RDIP as presented below.

- Field activities would be governed by a Project-specific Health and Safety Plan (HASP) specifying practices that would be employed by cleanup workers to avoid physical and chemical exposures during cleanup activities, including construction monitoring, as noted in later bullets.
- Cleanup activities would generally be performed on standard work days (Monday through Friday) during daylight hours, and the daily work period would be between the hours of 7:00 a.m. to 7:00 p.m. in accordance with the City of Monterey ordinance. Weekend or Holiday work would only occur pending discussion and approval from the City of Monterey. Weekend work would be limited to 8:00 a.m. to 6:00 p.m. on Saturdays and 10:00 a.m. to 5:00 p.m. on Sundays. Depending on the time of year, supplemental outdoor lighting use will be limited. Construction hours are in accordance with Monterey City Code Section 38-112.2.
- Utility clearance will be undertaken using geophysical remote sensing techniques prior to any earth disturbing activities to identify the presence of any subsurface utilities. If any pipelines are identified during the utility clearance process, precautions will be undertaken to avoid encountering them to minimize the potential for releases or disruption of services. These precautions include avoiding subsurface disturbance in the immediate vicinity of the pipelines, or, if that is unavoidable, protect the pipelines in place using hand tools to expose the pipelines and excavate soils from their immediate vicinity. If necessary, active pipelines may be de-activated and removed to allow soil excavation immediately around and beneath them, then replaced after excavation completion.
- Temporary traffic and engineering controls (i.e., fences, barricades, signs, caution marking, and/or traffic control staff/flaggers) would be implemented as needed to protect the public from cleanup activities and cleanup equipment. Traffic controls may apply to vehicles, bicycles, and/or pedestrians. The duration of traffic and engineering controls would not exceed the duration of these related cleanup activities and no permanent alterations in the layout of fences, roads, sidewalks, or other pathways are anticipated as a result of the remediation Project.
- Site controls would be implemented to prevent unauthorized persons from entering portions of a Site where such entry could pose a threat to themselves or others, or where such entry could interfere with the Project

investigation or remediation activities at the Site. Site security measures would include fencing, signage, lighting, and employing of an off-hour security guard.

- Vehicle traffic on and off Site associated with the cleanup activity may be restricted, as necessary, to hours after the morning commute peak (after 9:00 a.m.) and before the afternoon commute peak (before 3:00 p.m.). Vehicle traffic would be assessed during the Project activities to determine if these restrictions are necessary. Vehicles associated with the work would be required to follow all applicable speed limits and traffic laws. There will be no staging or parking of construction trucks on City streets.
- Construction activities would adhere to applicable City and County of Monterey noise control requirements. Noise monitoring will be implemented in accordance with the County of Monterey Noise Control Ordinance is included in Chapter 10.60 of the County's Code of Ordinances, which establishes a maximum noise level standard of 85 decibels (dB) on the A-weighted scale (dB[A]) at 50 feet for non-transportation noise sources. Action levels have been established for this Project. These action levels will be used to monitor and control noise above background noise levels during construction activities. Periodical monitoring around the property boundary will be performed, in addition to monitoring at the noise-generating equipment. Results will be shared with the field team to take proper action. Hours of construction are generally limited to 7 a.m. to 7 p.m., Monday to Friday; 8 a.m. to 6 p.m. on Saturday; and 10 a.m. to 5 p.m. on Sunday (Monterey City Code Section 38-112.2).
- Vibration monitoring would be conducted continuously during ground disturbing activities. The vibration action levels are adopted from California Department of Transportation (Caltrans; 2013) guidance, and would apply to structures within 50 feet of ground-borne vibration-generating activities. During field work, the vibration will be monitored continuously and compared with the established threshold action levels. If the action levels are exceeded, the contractor will immediately stop all operations, identify the changed conditions resulting in the increased vibration, modify work practices, and perform visual inspection of buildings for signs of cosmetic damage prior to restarting work.
- A *Perimeter Air Monitoring Plan* (PAMP) has been prepared for DTSC review and approval. The air monitoring program will include real-time monitoring, conducted using hand-held instruments that will measure the levels of respirable dust and total volatile organic compounds (VOCs) at the excavation site and perimeter. This real-time monitoring will provide instantaneous information about the air quality. Comparison of the real-time monitoring data to action levels will allow for continuous adjustments and improvements to the Project controls, if needed. Such adjustments could include implementing more rigorous dust/vapor suppression controls or modifying work activities. In addition, air samples will be collected from three air monitoring stations placed at the boundaries of the remediation and construction areas during the planned remedial activities. The air samples collected from the perimeter air monitoring stations will be sent to a laboratory for analysis. The analytical results will be used to validate the real-time air monitoring results and will also provide a detailed analysis of the air quality at the fenceline.
- In accordance with the PAMP, dust mitigation measures will be employed during all ground disturbance activities including, but not limited to, pre-wetting and maintaining visibly wet soil, covering inactive stockpiles and loads of material for export, reducing speed limits, wet-sweeping paths of travel, and minimizing track out by use of a wheel and boot wash system. The Project Team estimates that approximately 8,000 gallons of water would be used daily for this purpose.
- Odor/vapor or dust suppressant liquids or foams (e.g., OdexTM or RusFoamTM), or fibrous/hardshell-forming sprayable slurry products (e.g., RusTacTM or ConCoverTM) will be applied to open excavations and stockpiles as necessary. Chemical dust suppressant or chemical stabilizer, if used, will be applied according to manufacturer recommendations.
- Due to the size of the disturbance area (less than 1 acre), a Storm Water Pollution Prevention Plan (SWPPP) is not expected to be required for this Project pending evaluation of stockpile management plan. In place of a SWPPP, an Erosion Soil/Sediment Control Plan will be prepared and will include inspection requirements and best management practices (BMPs) for erosion control, sediment control, tracking control, wind erosion control, waste management, and pollution control during construction and ground-disturbance activities.
- Hazardous materials will be stored, and vehicles will be fueled, following spill control measures and standard procedures in accordance with a Project-specific Spill Prevention and Response Plan to be prepared and implemented by the Contractor to reduce the potential for spills and offsite discharge via storm water

- Wastes generated during remediation activities would be managed as described in the Project-specific Waste Management Plan (Appendix C of the RDIP), which specifies the measures required for safe handling of impacted media generated at the Project Site. To the extent practical, impacted soils being excavated from the Site would be directly loaded onto trucks for offsite transport, and stockpiling of impacted soils is not anticipated. Certain soils suitable for use as backfill would be temporarily stockpiled and covered with plastic or appropriate odor/vapor and dust suppressant on Site pending backfill. Liquid waste generated during remediation activities, such as decontamination water or groundwater extracted during dewatering, would be containerized in secondary containment and characterized pending offsite transport/disposal or treatment and discharge to the storm water system under permit. Wastes would be handled in accordance with state and federal regulations, including during offsite transport.
- Project activities will reduce emissions from heavy construction equipment by implementing the following measures:
  - Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations [CCR]), or less. Clear signage will be provided at all access points to remind construction workers of idling restrictions.
  - Construction equipment will be maintained per manufacturer's specifications.
  - Where practical, construction activities will employ the following measures:
    - Substitute electrified equipment for diesel- and gasoline-powered equipment.
    - Use alternatively fueled construction equipment onsite, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel.
    - Avoid the use of onsite generators by connecting to grid electricity or utilizing solar-powered equipment.
- To avoid impacts to special status species, a nesting bird survey will be conducted by a biologist experienced in avian surveys no more than two weeks prior to commencement of Project activities involving the removal of perimeter vegetation. Any active nests will be flagged and left intact during Project activities. Once the young have fledged the nest, the vegetation supporting the nest may be removed.
- Remediation Contractors would be made aware of the potential for encountering items of potential archaeological interest during excavation activities and would be trained in appropriate responses to such encounters. A Tribal Representative, Native American Monitor, or field-certified archeologist would be present during all ground disturbing activities.
- In the event of an accidental discovery of potential cultural or archaeological resources, Remediation Contractors shall immediately suspend excavation or other intrusive activities and cordon off the area within a 100-foot buffer zone and contact DTSC. A qualified archaeologist will be consulted to determine the best course of action regarding the potentially significant items. If it is determined that the objects are Native American in origin, the appropriate contact person(s) from a recognized local tribe would be contacted. Remediation Contractors will not touch or move the artifacts/remains and will not take photographs or videos of the artifacts/remains. After discussion with the Tribal Contacts and or their respective Cultural Resources Managers and in collaboration with DTSC (including the Office of Environmental Equity), measures will be implemented as deemed necessary to record and/or protect the cultural or archaeological resources. Work in the area of any such discovery would only be allowed to continue after completion of the archaeological/tribal consultation.
- In the event of an accidental discovery of human remains during ground-disturbing activities, excavation or disturbance of the Site or any nearby area shall stop immediately, and the County Coroner will be notified in accordance with applicable laws and regulations (specifically H&SC Section 7050.5). The coroner will determine disposition in 48 hours. If the coroner determines that the remains are Native American, the coroner will be responsible for contacting the California Native American Heritage Commission (NAHC) within 24 hours. The NAHC will identify and notify the person(s) who might be the most likely descendent who will make recommendations for the appropriate and dignified treatment of the remains (Public Resources Code, section 5097.98). The descendants will complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR Section 15064.5(e); H&SC Section 7050.5). If Native American human remains or any associated grave goods are found, procedures would be implemented as required in accordance with

Section 106 of the National Historic Preservation Act and Section 2(3) of the Native American Graves Protection and Repatriation Act, which requires work to be stopped in the area of the discovery (see also above bullet).

- No materials or equipment would be stored where they could interfere with the free and safe passage of personnel or vehicles on or off Site.
- Trucks related to the cleanup actions would be required to enter and exit the Project Site using driveways connected to Figueroa Street. No other ingress or egress locations will be allowed. Truck exteriors/tires will be cleaned as needed to avoid soil tracking off the Site onto public roadways. Truck inspections will be conducted to confirm 1) that the vehicle is in safe operating condition; and 2) the material being transported is secured and will not be released from the vehicle during transport.
- The Project would comply with both Monterey County and the City of Monterey permit conditions. Monterey County permit conditionswould require a minimum 65 percent of non-hazardous construction and demolition debris to be recycled and/or salvaged for reuse (California Green Building Standards Code Sections 4.408, 5.408, 301.1.1 and 301.3). Similarly, City of Monterey Code requires compliance with adopted State Regulations adopted in City Code Chapter 9, Article 1, Section 9-0.1.
- The Project Team will confer with local, state, and federal agencies to determine which permits/approvals are needed, and if so, will adhere to requirements associated with those permits/approvals. The following permits may be required and will be procured prior to starting project activities:
    - County of Monterey Department of Environmental Health (CMDEH) Soil Boring Permit for the advancement of approximately 100 temporary soil borings
    - CMDEH Groundwater Monitoring Well Decommissioning Permit for the abandonment of two existing onsite groundwater monitoring wells
    - County of Monterey Resource Management Agency Building and Grading Permits for remedial action activities
    - City of Monterey Community Development Department Building Permit and Encroachment Permits for the construction of the new access driveway and gate, and the expansion of the existing driveway and gate
    - Monterey One Water permit to discharge treated groundwater and construction water to the sanitary sewer
    - Regional Water Quality Control Board General Construction Permit with corresponding Stormwater Pollution Prevention Plan if triggered by activities and stockpile management
- The following notifications will be completed prior to starting project activities:
    - Monterey Bay Air Resources District asbestos survey and notification prior to demolition
    - Cal/OSHA asbestos containing material abatement notification
    - Cal/OSHA excavation permit for excavations greater than 5 feet
    - US Environmental Protection Agency Toxic Substances Control Act coordination for the potential generation of PCB remediation waste
    - California Coastal Commission notification of activities for confirmation that project is outside of jurisdiction (more than 1,000 feet from the Coastal Zone.

References

Environmental Resources Management (ERM). 2020a. *Soil Remediation Feasibility Study and Remedial Action Plan, Former Monterey-1 Manufactured Gas Plant Electrical Substation, 498 Del Monte Avenue, Monterey,* California. 18 December.

ERM. 2020b. *Remedial Design and Implementation Plan, Former Monterey-1 MGP Electrical Substation, 498 Del Monte Avenue, Monterey, California*. 18 December.

City of Monterey. Adopted 2010.*Map 3: Showing Land Use.* From the *City of Monterey General Plan*. Created February 2011. Accessed on 4/6/2020 at: https://monterey.org/Portals/0/Policies-Procedures/Planning/Maps/General-Plan-Land-Use-Map.pdf

List of Attachments

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ENVIRONMENTAL IMPACT ANALYSIS:

1. Aesthetics

Project Activities Likely to Create an Impact on Aesthetics:

Project activities that could potentially impact aesthetics are construction activities that could interfere with or degrade scenic views, including:

- Installation of temporary facilities, including an office trailer and separate sanitary and wash facilities, at the Project Site.
- Demolition (concrete breaking) and construction (paving and gate installation) of two access gates and driveway along Figueroa which would result in the presence and operation of construction equipment outside the perimeter walls.
- Demolition of surface/subsurface features including compacted gravel, concrete foundations, vaults, slabs, shed with overhang, concrete block wall, and utilities (known and unknown); excavation/removal and stockpiling of contaminated soil, concrete, asphalt, and/or wood; and loading the contaminated media onto dump trucks, which would result in the presence and operation of construction equipment (such as an excavator, backhoe, bulldozer, jack hammer, and/or grader) that would be visible through the access gates, when open.
- Dewatering activities, which would require the presence of a groundwater storage tank and treatment unit that would be visible through the access gates, when open.
- Offsite transport and disposal/recycling of excavated soil, concrete, asphalt, wastewater, and/or wood to appropriate facilities based on waste characterization and import of clean soil, which would result in an increased amount of vehicular traffic in the Site vicinity.
- Site restoration, including importation of clean fill and backfill of all excavated areas, which would result in the presence of construction equipment and an increased amount of vehicular traffic in the Site vicinity.
- Subsurface sample collection involving the use of a drill rig.

Description of Baseline Environmental Conditions:
The Project Site is in the northern portion of the City of Monterey less than ½ mile from Monterey's Fisherman's Wharf, a major tourist attraction. The Project Site is completely bound by commercial use and recreational use areas, and enclosed on the north, south, west, and east by walls. The Project Site is designated with a land use of public/semi-public, and land use in the vicinity of the Site is mostly commercial and residential. The Project Site vicinity is zoned for Planned Community - Downtown Specific Plan (PC- D), with several lots listed as being within a City of Monterey Historic Districts (City of Monterey 2019a); the closest of these districts is 0.19 mile southwest of the Project Site. One structure within a 500-foot area of potential effect for viewshed is at the northeast corner of the substation property, and is identified as an historic building by the City of Monterey; this building is not considered a contributor to Monterey's Historic District or on the National Register of Historic Places.

The Monterey County General Plan (Monterey County 2010a) and City of Monterey General Plan (City of Monterey 2019a) identify scenic resources and specific goals and ordinances to protect the character of the area. The City of Monterey adopted a General Plan for the City, and a Downtown Specific Plan as a guide for future development in the Downtown and East Downtown where Project activities will occur. The Downtown Plan outlines three downtown design character goals including preserving architectural character that reflects "Old Monterey" and promoting new structures that complement the City's strong architectural heritage (City of Monterey 2017). The City of Monterey has also identified Historic Buildings as an area of concern in the Urban Design chapter of the General Plan (City of Monterey 2019b). Two specific policies are focused on protecting and enhancing the setting and scale of historic buildings via careful design of adjacent buildings. The County of Monterey has also identified a Scenic Highway Corridor and Visual Sensitivity area of the Greater Monterey Peninsula; neither of these areas are in close proximity to the Project Site (Monterey County 2010a).

Existing sources of light/glare include headlights on vehicles operating outside daylight hours and reflection of sunlight off glass windows or other shiny surfaces.

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect on a scenic vista.

Impact Analysis:
No local scenic vistas were identified within 1 mile of the Project area; therefore, work activities will not have a substantial adverse effect on a scenic vista. The presence of walls around the Project Site would minimize views of the cleanup activities. Vehicular traffic associated with the proposed Project would be similar in nature to traffic currently travelling on roadways adjacent to the Project Site. Given the distance of the Project Site from established scenic highways (more than 1 mile), Project-related activities would not be visible from those highways to such an extent that they would degrade the view. Therefore, cleanup actions would not have an impact on a scenic vista.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.

Impact Analysis:
The Project Site is not within a state scenic highway, and would, therefore, not damage scenic resources within a state scenic highway. The actions evaluated in this Initial Study are in close proximity to a historic building, but the proposed cleanup activities do not involve demolition of that building or excavation beneath it. As noted in the Project Description, shoring and slot trenching may be implemented as needed for protection of the building.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact Analysis:
The Project Site is surrounded by perimeter walls at least 8 feet tall. Activities associated with the proposed cleanup actions would generally not be visible to persons not involved in the cleanup work, except while the access gates are open. Activities that would be visible to the public include 1) demolition of a portion of the perimeter wall in preparation for the access gate construction, and construction of the driveway and access gates, and 2) vehicular traffic associated with offsite transport of contaminated media and onsite transport of backfill materials. Vehicular traffic associated with the proposed Project would be similar in nature to traffic currently travelling on roadways adjacent to the Project Site.

The Project Site is not in the historic district defined in the Monterey Historic Preservation Plan and would not affect the viewshed of structures within that district. The viewshed of the historic building at the northeast corner of the PG&E Property would be altered by the relocation of a wall adjacent to it, which would separate the building from the proposed cleanup actions (Jacobs 2020, Attachment B). This wall would block views of construction equipment and activities from that building.

The short duration of the onsite construction activities (approximately 5 months for period of ground disturbance) and temporary increase in vehicle traffic associated with the Project would not substantially affect the visual character of the Project Area. Project activities would include Project controls to avoid unacceptable dust emissions that could temporarily degrade the site's visual character during construction. Because the excavation would be backfilled to pre-remediation grade upon achieving the cleanup goals, the visual character of the Site after completion of the work would be unchanged from baseline conditions. Therefore, no significant degradation of the existing visual character or quality of the Project Site would occur, and the impact from the Project would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Impact Analysis:
Project activities could create minor new temporary sources of light or glare due to the presence of cleanup equipment (i.e., headlights on vehicles, reflection of sunlight). Project activities would primarily be implemented during daylight hours and are not anticipated to require the use of additional lighting, with the exception of security lighting similar in nature to lighting used at the substation before the cleanup actions. Based on the short duration of work, any light or glare effects would not be significant. The Project does not involve the construction of permanent buildings/structures that would create new long-term sources of lighting or glare. Therefore, impacts from the Project associated with light or glare would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

City of Monterey. 2017. *Downtown Specific Plan*. Adopted October 2013, last amended April 2017. Accessed online 2/21/2020 at: https://monterey.org/Portals/0/Policies-Procedures/Planning/WorkProgram/DSP/17_0418_Downtown_SP_Amend_Web.pdf

City of Monterey. 2019a. *General Plan*. Adopted 2005, last amended June 2019. Accessed online 2/21/2020 at: https://monterey.org/Portals/0/Reports/CommDev/19_0604%20General%20Plan.pdf

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Jacobs. 2020. Historical Evaluation of the Pacific Gas and Electric Company Monterey Substation, 498 Del Monte Avenue, Monterey, Monterey County, California. July 31.

Monterey County. 2010a. *Monterey County General Plan*. Adopted October 2010. Accessed online 2/21/2020 at: https://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/2010-general-plan

2. Agriculture and Forest Resources

Project Activities Likely to Create an Impact on Agricultural or Forest Resources: None

Description of Baseline Environmental Conditions/Explanation for No Impact Finding:

The Project Site is in an area that has been historically developed. As specified in the City of Monterey General Plan, Land Use Element, the Site is categorized as a Public/Semi-Public land use because it is a “private facilities operated to serve the general public” (City of Monterey 2004, 2019d). For approximately 86 years prior to the planned remediation activities, the Project Site contained structures associated with an electrical substation (ERM 2020a). Prior to that time, an MGP plant was on the Project Site and immediate vicinity. The Site and immediate vicinity currently have no agricultural uses, forest lands, Timberland, or timberland zoned for Timberland production.

Under the California Department of Conservation Division of Land Resource Protection’s Farmland Mapping and Monitoring program pursuant to Section 65570 of the California Government Code, a map has been prepared that depicts locations of important farmland in Monterey County. This map indicates that Prime Farmland, Farmland of Statewide Importance, or Unique Farmland are not present within the Project Site area, which is classified as “Urban and Built-Up Land” (California Department of Conservation 2016). Additionally, there are no lands currently contracted under the Williamson Act on the Project Site (Monterey County Agricultural Commissioner’s Office

2016). The City of Monterey, and subsequently the Project Site, does not contain any commercial forests or agricultural lands within its boundaries (City of Monterey 2019c).

Consequently, the Project would have No Impact on agriculture and forest resources, and no further analysis of impacts is deemed necessary.

Analysis as to whether or not project activities would:

a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.*

Impact Analysis:
Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. *Conflict with existing zoning or agriculture use, or Williamson Act contract.*

Impact Analysis:
Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. *Conflict with existing zoning for, or cause rezoning of, forest lands (as defined in Public Resources Code section 12220(g)), Timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

Impact Analysis:
Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. *Result in the loss of forest land or conversion of forest land to non-forest use?*

Impact Analysis:
Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

Impact Analysis:
Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

California Department of Conservation. 2016. Farmland Mapping and Monitoring Program website. Map entitled *Monterey County Important Farmland 2016.* Accessed 2/19/2020 at: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/mnt16_no.pdf

City of Monterey. 2004. *City of Monterey Zoning Map*. Accessed on 3/12/2020 at. https://monterey.org/Portals/0/Policies-Procedures/Planning/Maps/Zoning-Map.pdf

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City of Monterey. 2019d. *City of Monterey General Plan*. Land Use Element. Adopted 2005, last amended June 2019. Accessed on 3/17/2020 at. https://monterey.org/Portals/0/Reports/CommDev/19_0604%20General%20Plan.pdf

City of Monterey. Adopted 2010. *Map 3: Showing Land Use.* From the *City of Monterey General Plan.* Created February 2011. Access on 3/17/2020 at https://monterey.org/Portals/0/Policies-Procedures/Planning/GeneralPlan/3-Land-Use.pdf

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Monterey County Agricultural Commissioner's Office. Data from 2016. *Williamson Act Contracts*. Accessed on 3/12/2020. https://montereyco.maps.arcgis.com/apps/webappviewer/index.html?id=9aa9d5bf30904f3c904eb5fe869f62b7

3. Air Quality

Project Activities Likely to Create an Impact on Air Quality:

Project activities that could emit dust, fuel combustion exhaust, and other air pollutants, and therefore, potentially impact air quality, include:

- Demolition of existing surface and subsurface Site features including compacted gravel, concrete foundations, vaults, slabs, shed with overhang, concrete block wall, and utilities (known and unknown).
- Construction of a second access point (driveway) along Figueroa Street, pending approval from the City of Monterey.
- Expansion (widening) of the existing access gate along Figueroa Street, pending approval from the City of Monterey.
- Excavation/removal and stockpiling of contaminated soil, concrete, asphalt, and/or wood using appropriate construction equipment in select areas (excavator, backhoe, bulldozer, jack hammer, or grader); stockpiling as needed; and loading the contaminated media onto dump trucks.
- Offsite transport and disposal/recycling of excavated soil, concrete, asphalt, wood, and wastewater to appropriate facilities (based on waste characterization), and importation of clean soil. These excavation activities would require up to approximately 710 round trips by haul trucks or vacuum truck to transport materials offsite; this level of Project-related traffic would occur over the course of approximately 5 months.
- Placement of backfill into excavated areas. Import activities would require up to approximately 690 round trips by haul trucks to import materials onsite; this level of Project-related traffic would occur over the course of approximately 5 months.

For the Project activities included in this evaluation, the anticipated duration is up to 5 months. Less than 1 acre of land, in total, would be disturbed by these activities. The sources of air emissions would include primarily exhaust from heavy construction equipment and vehicles, such as haul trucks, and dust from soil excavation, employee travel, and other material transfer activities. As such, these activities can be characterized as Project construction activities.

Description of Baseline Environmental Conditions:
The Project Site is within the County of Monterey, which is in the North Central Coast Air Basin (NCCAB), where the Monterey Bay Air Resources District (MBARD) is charged with maintaining air quality. For several decades prior to the planned cleanup activities, the Project Site has contained an operating electrical substation (ERM 2020a). In 2021, PG&E will temporarily de-energize the electrical substation and remove the above-grade equipment to prepare for installation of an upgraded electrical substation. The proposed cleanup actions would be performed while the substation is inactive and the Project Site is vacant; there will be no air emissions associated with Site conditions immediately prior to the start of Project-related activities.

The analysis in this section focuses in part on the elderly, children, infirm, or persons with particular sensitivity to air pollutants, referred to as “sensitive receptors”. The nearest areas to the Project Site where children are routinely present is the onsite babysitting at Monterey Sports Center, approximately 300 feet west of the Project Site and the baseball field (Jacks Park) across East Franklin Street, approx. 175 feet south of the Project Site. The center offers short-term babysitting as a service for parents visiting the Sports Center. This babysitting service occurs within indoor locations only, is provided for up to 2 hours at a time and babysitting can only be utilized twice in 1 day. Although this site is not a standard day-care center, it is included to be conservative. The nearest sensitive receptor is the San Carlos School, which is a school from grades of transitional kindergarten through eighth grade. The San Carlos School is at 450 Church Street, which is approximately 0.2 miles south of the Project Site. The nearest residential housing is 0.3 miles west of the Project Site. The nearest hospital is the Westland House of Community Hospital of the Monterey Peninsula, approximately 1.5 miles south of the Project Site. The nearest senior residential care home is Del Monte Assisted Living and Memory Care, which is approximately 2 miles west of the Project Site. This area is zoned for medium density housing (City of Monterey 2019).

The following subsections describe: the local topography and meteorology conditions, which heavily influence air quality; applicable regulatory ambient air quality standards; air quality attainment status and ambient air quality in the Project area, and regulatory background related to air quality.

Topography and Meteorology Conditions in the Vicinity of the Project Site
The NCCAB comprises 5,159 square miles along California’s central coast. It is generally bounded by the Monterey Bay to the west, the Santa Cruz Mountains to the northwest, the Diablo Range on the northeast, with the Santa Clara Valley between them. The Air Basin includes Monterey, Santa Cruz, and San Benito Counties. The northwest sector of the basin is dominated by the Santa Cruz Mountains. The Diablo Range marks the northeastern boundary and, together with the southern extent of the Santa Cruz Mountains, forms the Santa Clara Velley, which extends into the northeastern tip of the basin. Farther south, the Santa Clara Valley transitions into the San Benito Valley, which extends northwest-southeast and has the Gabilan Range as its western boundary. To the west of the Gabilan Range is the Salinas Valley, which extends from Salinas at the northwest end to King City at the southeast end. The western side of the Salinas Valley is formed by the Sierra de Salinas, which also forms the eastern side of the smaller Carmel Valley. The coastal Santa Lucia Range defines the western side of the Carmel Valley.

The semi-permanent high-pressure cell in the eastern Pacific Ocean is the basic controlling factor in the climate of the NCCAB. In the summer, the high-pressure cell (Pacific High) is dominant and causes persistent west and northwest winds over the entire California coast. Air descends in the Pacific High forming a stable temperature inversion of hot air over a cool coastal layer of air. The onshore air currents pass over cool ocean waters to bring fog and relatively cool air into the coastal valleys. The warmer air aloft inhibits vertical air movement.

The generally northwest-southeast orientation of mountain ridges tends to restrict and channel the summer onshore air currents. Surface heating in the interior portion of the Salinas and San Benito Valleys creates a weak low pressure, which intensifies the onshore airflow during the afternoon and evening.

In the fall, the surface winds become weak, and the marine layer grows shallow, dissipating altogether on some days. The airflow is occasionally reversed in a weak offshore movement, but the relatively stationary air mass is held in place by the Pacific High, which allows pollutants to build up over a period of a few days. It is most often during this season that the north or east winds develop to transport pollutants from either the San Francisco Bay area or the Central Valley into NCCAB.

During the winter, the Pacific High migrates southward and has less influence on the NCCAB. Air frequently flows in a southeasterly direction out of the Salinas and San Benito Valleys, especially during night and morning hours. Northwest winds are nevertheless still dominant in winter, but easterly flow is more frequent. The general absence

of deep, persistent inversions and the occasional storm systems usually result in good air quality for the basin as a whole in winter and early spring.

Monterey Bay is a 25-mile-wide inlet, which allows marine air at low levels to penetrate the interior. The Salinas Valley is a steep-sloped coastal valley, which opens out on Monterey Bay and extends southeastward with mountain ranges of 2,000 to 3,000 feet elevation on either side. The broad area of the valley floor near the mouth is 25 miles wide, narrowing to about 6 miles at Soledad, which is 40 miles inland; and narrowing to 3 miles wide at King City, which is about 60 miles from the coast. At Salinas, near the northern end of the Valley, west and northwest winds occur about one-half the time during the entire year. Although the summer coastal stratus rarely extends beyond Soledad, the extended sea breeze, which consists of warmer and drier air currents, frequently reaches far down the Salinas Valley. In the southern end of the Valley, which extends into the South Central Air Basin to Paso Robles, winds are generally weaker most of the year, except during storm periods.

The Project area typically has average maximum and minimum winter (i.e. January) temperatures of 60 and 43 degrees Fahrenheit (°F), respectively, while average summer (i.e. July) maximum and minimum temperatures are 68 and 52 °F, respectively. The warmest month is typically September, with an average maximum high of 72 °F. Because of the moderating marine influence, which decreases with distance from the ocean, monthly and annual temperature variations are greatest inland and smallest at the coast. The Project area is near the coast with temperature variations that are relatively moderate. Precipitation in the Project area averages approximately 20 inches per year (Western Regional Climate Center 2016).

Applicable Regulatory Ambient Air Quality Standards
The State of California and the USEPA have established Ambient Air Quality Standards (AAQS) for certain pollutants, known as criteria pollutants, to protect the public health and welfare. Criteria pollutants of primary concern within NCCAB are ozone (O_3) and inhalable particulates. In addition, carbon monoxide (CO) pollution is addressed given the increasing traffic congestion within NCCAB. The following summarizes the State and USEPA AAQS for O_3, particulate matter (PM_{10} and $PM_{2.5}$), and CO. A complete summary of State and USEPA AAQS is provided in Table 3-1.

MBARD has set a health-based AAQS for O_3 that includes two components that are not to be exceeded. The ambient concentration of O_3 is not to exceed 0.09 parts per million (ppm) averaged over a 1-hour period and 0.070 ppm averaged over an 8-hour period. The revised State AAQS, which includes the stringent 8-hour component, became effective in May of 2006. Both components of the standard must be met for an area to achieve the revised State AAQS for O_3. The USEPA has set the federal O_3 AAQS at 0.070 ppm, averaged over an 8-hour period.

The MBARD has established a health-based AAQS for PM_{10}, which also includes two not-to-exceed components. The ambient concentration of PM_{10} is not to exceed 50 micrograms per cubic meter ($\mu g/m^3$) averaged over a 24-hour period and 20 $\mu g/m^3$ measured as an annual average. The USEPA's 24-hour AAQS for PM_{10} is 150 $\mu g/m^3$. USEPA's $PM_{2.5}$ 24-hour standard is 65 $\mu g/m^3$ and the annual average is 12 $\mu g/m^3$. MBARD's annual $PM_{2.5}$ standard is also 12 $\mu g/m^3$.

The MBARD's primary not-to-exceed AAQS for CO is 20 ppm for a 1-hour period; the USEPA's primary not-to-exceed AAQS is 35 ppm for 1 hour. For an 8-hour average, the MBARD and USEPA not-to-exceed AAQS is 9 ppm.

Air Quality Attainment Status and Ambient Air Quality in Project Area
The USEPA and California Air Resources Board (CARB) designate a region that is meeting the air quality standard for a given pollutant as being in "attainment" for that pollutant; regions not meeting the federal or state standards are designated as being in "nonattainment" for that pollutant. Under the federal Clean Air Act (CAA), the NCCAB is designated an attainment area for the federal 1-hour O_3 AAQS. The NCCAB was redesignated from moderate nonattainment area to a maintenance area in 1997 after meeting the federal 1-hour O_3 standard in 1990. The NCCAB is designated as an attainment area for the federal 8-hour O_3 AAQS.

Prior to revision of the State AAQS for O_3, the NCCAB was close to attaining the State 1-hour AAQS, which was reflected in the area's nonattainment-transitional designation. Further, the NCCAB is designated a nonattainment area for the State PM_{10} AAQS and an attainment area for the State $PM_{2.5}$ AAQS.

Table 3-2 summarizes the attainment status of the NCCAB for the criteria pollutants of concern. The following section describes ambient air quality in the Basin.

Ambient air quality is monitored at seven District-operated monitoring stations in Salinas, Hollister, Carmel Valley, Santa Cruz, Scotts Valley, Davenport, and Watsonville. In addition, the National Park Service operates a station at the Pinnacles National Monument and an industry consortium operates a station in King City. Existing levels of air pollutants in the Project area can generally be inferred from ambient air quality measurements conducted by MBARD at its closest station. The closest station to the Project Site is the Carmel Valley monitoring station, approximately 17 miles to the southeast; this station measures concentrations of O_3 and $PM_{2.5}$. The next closest station is the Salinas monitoring station, approximately 22 miles northeast of the Project Site; this station measures CO in addition to O_3 and $PM_{2.5}$. The only monitoring station in the NCCAB that measures concentrations of PM_{10} is the Hollister Monitoring Station, which is approximately 44 miles northeast of the Project Site. In addition, PM_{10} monitoring at the Hollister station uses only federal reference or equivalent methods, so the data can only be compared to the federal standard.

Ambient concentrations of air pollutants in a given area are determined by the quantity of pollutants emitted by local sources in the area and the atmosphere's ability to transport and dilute such emissions. Areas located close together and exposed to similar wind conditions typically have similar background pollutant concentrations. There were no recorded violations of the state or federal standards from 2011 through 2015.

Based on monitoring data from ambient monitoring stations, O_3 concentrations exceeded the State 1-hour AAQS until it was attained in 2009; there was one additional exceedance in the 1-hour standard during the 2009-2015 period in 2013. NCCAB currently meets the 1-hour component of the State O_3 standard. Most NCCAB exceedances follow the typical May through October seasonal pattern; however, with the State 8-hour standard, exceedances start as early as April, which increases the number of exceedances.

Regulatory Background

Federal

The federal CAA establishes the statutory framework for regulation of air quality in the United States. Pursuant to this act, the USEPA has established various regulations to achieve and maintain acceptable air quality, including the adoption of National Ambient Air Quality Standards (NAAQS), mandatory state implementation plan (SIP) or maintenance plan requirements to achieve and maintain NAAQS, and emission standards for both stationary and mobile sources of air pollution. National ambient air quality standards were established in 1970 for six pollutants: CO, O_3, PM_{10} and $PM_{2.5}$, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. These pollutants are commonly referred to as criteria pollutants, because they are considered the most prevalent air pollutants known to be hazardous to human health. If a region is designated as nonattainment for a NAAQS, the federal CAA requires the state to develop a SIP to demonstrate how the standard will be attained, including the establishment of specific requirements for review and approval of new or modified stationary sources of air pollution. The CAA Amendments of 1990 directed the USEPA to set standards for toxic air contaminants and required facilities to sharply reduce emissions. Table 3-1 summarizes state and federal ambient air quality standards.

State

The CARB is the state agency responsible for California air quality management, including establishment of California Ambient Air Quality Standards (CAAQS), mobile source emission standards, and greenhouse gas (GHG) regulations, as well as oversight of regional air quality districts and preparation of implementation plans, including regulations for stationary sources of air pollution. The CAAQS are generally more stringent, except for the Annual Arithmetic Mean NO_2 and 1-hour SO_2 standards, and include more pollutants than the NAAQS (see Table 3-1). California specifies four additional criteria pollutants: visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to USEPA, CARB designates counties in California as being in attainment or nonattainment for the CAAQS.

The Air Toxic "Hot Spots" Information and Assessment Act identifies toxic air contaminant hot spots where emissions from specific sources may expose individuals to an elevated risk of adverse health effects, particularly cancer or reproductive harm. Toxic air contaminants are also referred to as hazardous air pollutants. The Act requires that a business or other establishment identified as a significant source of toxic emissions provide the affected population with information about health risks posed by the emissions.

Regional/Local

The Project Site is in the MBARD within the jurisdiction of the NCCAB. The NCCAB is the regional agency charged with preparing, adopting, and implementing emission control measures and standards for stationary sources of air pollution pursuant to delegated state and federal authority. Because the Project will not involve construction of new stationary sources, there are no permitting regulations relevant to the Project.

Under the California CAA, the NCCAB is required to develop an air quality plan to achieve and/or maintain compliance with federal and state nonattainment criteria pollutants within the air district. The NCCAB has taken action and developed plans to achieve and/or maintain compliance with the federal and state O_3 and particulate matter (PM_{10} and $PM_{2.5}$) standards.

Approach for Evaluating Project-Related Impacts to Air Quality
The MBARD has published guidelines for analysis and mitigation of impacts from projects within its jurisdiction. The methodology from the 2016 MBARD Guidelines for Implementing CEQA (MBARD 2016) was used to evaluate impacts from the proposed Project. The “Thresholds of Significance” from those Guidelines are presented in the following sections. In addition, these Thresholds of Significance were used to determine the significance of each impact discussed in Sections (a) through (e) below.

For the purposes of this Initial Study, emissions were calculated to evaluate whether the impacts from the proposed Project would exceed the 2016 MBARB CEQA Thresholds of Significance for construction impacts.

The 2016 MBARB CEQA Guidelines present average daily emissions Thresholds of Significance for construction projects, such as the proposed Project. These thresholds are presented in Table 3-3 below. It should be noted that the daily emission thresholds in Table 3-3 are average daily emissions. Thus, even if certain peak days have emissions over the identified thresholds, as long as the average daily emissions are below these thresholds, the impacts are considered less than significant.

Table 3-1 – Ambient Air Quality Standards and Designations

Ambient Air Quality Standards and Designations										
Pollutant	Averaging Time	California			National Standards[a]					
		Standards (ppm)[b, c]	Standards ($\mu g/m^3$)[b, c]	Standards (mg/m^3)[b, c]	Primary (ppm)[c,e]	Primary ($\mu g/m^3$)[c,e]	Primary (mg/m^3)[c,e]	Secondary (ppm)[c,f]	Secondary ($\mu g/m^3$)[c,f]	Secondary (mg/m^3)[c,f]
Ozone (O_3)	1-hour	0.09	180	0.18	-[h]	-[h]	-[h]	-	-	-
Ozone (O_3)	8-hour	0.070	137	0.137	0.070	137	0.137	0.070	137	0.137
Carbon Monoxide (CO)	1-hour	20	23000	23	35	40000	40	-	-	-
Carbon Monoxide (CO)	8-hour	9	10000	10	9	10000	10	-	-	-
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.18	57	0.057	0.053	100	0.1	0.053	100	0.1
Nitrogen Dioxide (NO_2)	1-hour	0.18	339	0.339	-	-	-	-	-	-
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	-	-	-	0.03	-	-	-	-	-
Sulfur Dioxide (SO_2)	24-hour	0.04	105	0.105	0.14	-	-	-	-	-
Sulfur Dioxide (SO_2)	3-hour	-	-	-	-	-	-	0.5	1300	1.3
Sulfur Dioxide (SO_2)	1-hour	0.25	655	0.655	0.075	196	0.196	-	-	-
Respirable Particulate Matter (PM_{10})	Annual Arithmetic Mean	-	20	0.02	-[h]	-[h]	-[h]	-	-	-
Respirable Particulate Matter (PM_{10})	24-hour	-	50	0.05	-	150	0.15	-	150	0.15
Fine Particulate Matter ($PM_{2.5}$)	Annual Arithmetic Mean	-	12	0.012	-	12	0.012	-	15	0.015
Fine Particulate Matter ($PM_{2.5}$)	24-hour	-	-	-	-	35	0.035	-	35	0.035
Lead[i]	30-day average	-	1.5	0.0015	-	-	-	-	-	-
Lead[i]	Calendar quarter	-	-	-	-	1.5	0.0015	-	1.5	0.0015
Lead[i, j]	Rolling 3-Month average	-	-	-	-	0.15	0.00015	-	0.15	0.00015
Sulfates	24-hour	-	25	0.025	-	-	-	-	-	-
Hydrogen Sulfide	1-hour	0.03	42	0.042	-	-	-	-	-	-
Vinyl Chloride[i]	24-hour	0.01	26	0.026	-	-	-	-	-	-
Visibility-Reducing Particle Matter	8-hour	see below[k]	see below[k]	see below[k]	-	-	-	-	-	-

[a] National standards (other than O_3, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact the USEPA for further clarification and current national policies.

[b] California standards for O_3, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the CCR.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[e] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[f] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[h] The 1-hour O_3 NAAQS was revoked on June 15, 2005 and the annual PM10 NAAQS was revoked in 2006.

[i] The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[j] The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[k] In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Table 3-2 Attainment Status of the North Central Coast Air Basin

Pollutant	Federal	State
Ozone (O_3) – 1-hour	Attainment	Nonattainment- Transitional
Ozone (O_3) – 8-hour	Attainment	
Carbon Monoxide (CO)	Attainment	Monterey Attainment
Inhalable Particulates (PM_{10})	Attainment	Nonattainment
Inhalable Fine Particulate ($PM_{2.5}$)	Attainment	Attainment

Table 3-3. Monterey Bay Air Resources District Thresholds of Significance for CEQA

Criteria Pollutant or Precursor	MBARD CEQA Thresholds
NOx (lb/day)	137
PM_{10} Exhaust (lb/day)	82
$PM_{2.5}$ Exhaust (lb/day)	55
Reactive Organic Gas (lb/day)	137
CO (lb/day)	550

Source: 2016 MBARD Guidelines for Implementing CEQA page 4

Table 3-4. Basic Construction Best Management Practices

Basic Construction Measures Recommended for ALL Proposed Projects
1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material offsite will be covered.
3. All visible mud or dirt track-out onto adjacent public roads will be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads will be limited to 15 miles per hour.
5. Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of CCR). Clear signage will be provided for construction workers at all access points.
6. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications. All equipment will be checked by a certified mechanic and determined to be running in proper condition prior to operation.
7. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person will respond and take corrective action within 48 hours. The Air District's phone number will also be visible to ensure compliance with applicable regulations.

Source: Table 8-2 from Bay Area Air Quality Management District (BAAQMD) 2017 CEQA Guidelines.

Analysis as to whether or not project activities would:

a. Conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis:
As noted above, the applicable air quality plan for the Project area is the Monterey Bay 2012-2015 Clean Air Plan (MBARD 2017). Project-related activities that could affect air quality are temporary in nature (anticipated 5-month duration). Construction associated with the Project would result in emissions of O_3 precursors (NOx and ROG), particulate matter, air toxics, and GHGs (see Section 8 of this Initial Study).

The Clean Air Plan was initially released in 1991, where the District adopted a number of rules that reduced NOx and ROG by many tons per day. Since those earlier years of rule adoption, the availability of high-yield measures has diminished significantly with potential control measures only reducing the inventory by a few tenths of a percent at most. Without implementation of additional measures, emissions for both NOx and ROG are projected to continue to decline. Additional control measures have not been implemented as the District determined that progress continues to be made, significant reductions in O_3 concentrations are not anticipated with implementation of available cost-effective control measures, and significant contributions to the NCCAB's violation of the 8-hour O_3 standard comes from pollution transported from areas outside of the NCCAB. As such the District is not implementing marginally effective measures (MBARD 2017).

The Project has been designed to reduce air emissions (NOx, ROG, and particulate matter among other pollutants) during construction as much as possible. The construction activities would be conducted in accordance with the approved Perimeter Air Monitoring Plan (Appendix E of the RDIP), which specifies the air monitoring program that would be followed, including real-time monitoring of respirable dust and total VOCs at the excavation site and perimeter and collection of air samples for laboratory analysis. Based on the real-time monitoring data, adjustments in Project activities would be implemented as needed to prevent exceedances of action levels. Such adjustments could include implementing more rigorous dust/vapor suppression controls or modifying work activities.

As noted in the Project Controls section of the Project Description, BMPs specified in the FS/RAP and RDIP to reduce air emissions would include:

- Employing dust mitigation measures during all ground disturbance activities including, but not limited to, pre-wetting and maintaining visibly wet soil, covering inactive stockpiles and loads of material for export, reducing speed limits, wet-sweeping paths of travel, and minimizing track-out by use of a wheel and boot wash system.
- Minimizing Idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of CCR), or less.
- Maintaining construction equipment per manufacturer's specifications.
- Where practical, employing the following measures:
  - Substituting electrified equipment for diesel- and gasoline-powered equipment.
  - Using alternatively fueled construction equipment onsite, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel.
  - Avoiding the use of onsite generators by connecting to grid electricity or utilizing solar-powered equipment.
- Field activities would be governed by a Project-specific HASP specifying practices that would be employed by cleanup workers to avoid physical and chemical exposures during cleanup activities, including air monitoring, as necessary.

Construction activities will implement BMPs to reduce emissions to less than significant (Table 3-4). Project-related emissions from operation of demolition and construction equipment, truck trips for export of contaminated materials and import of clean backfill, and fugitive dust from earthmoving were estimated using the CalEEMod emissions estimation model (output file provided in Attachment C). As shown in Table 3-5, those emissions would be less than the MBARD CEQA significance thresholds.

Table 3-5. Comparison of Project-Related Construction Emissions of Criteria Pollutants and Precursors to MBARD's Thresholds of Significance

Criteria Pollutant or Precursor	Calculated Average Daily Construction Emissions	MBARD CEQA Thresholds
NOx (lb/day)	38	137
PM_{10} Exhaust (lb/day)	0.98	82
$PM_{2.5}$ Exhaust (lb/day)	0.92	55
Reactive Organic Gas (lb/day)	2.7	137
CO (lb/day)	21.8	550

Note: Emissions calculated using the CalEEMod emissions estimation model. The MBARD CEQA thresholds shown are those listed in 2016 MBARD Guidelines for Implementing CEQA page 4

The construction emissions for off-road heavy equipment, haul trucks, and construction commute trips were estimated by using the CalEEMod emissions estimation model, which incorporates emission factors from the CARB OFFROAD program for heavy equipment and from the CARB EMFAC2014 program for on-road vehicles. For the purposes of the CalEEMod analysis, Project activities were assumed to be completed during the period from January through May of 2021. This approach is suitable for comparison to the MBARD CEQA thresholds since they are based on average daily emissions.

Inputs to CalEEMod for both off-road and on-road vehicles, such as miles traveled and number of round trips, were based on the description of the equipment and vehicle schedule for the proposed cleanup activities (also included in Attachment C).

The recommended measure for determining Project support of the goals of the Clean Air Plan is to evaluate consistency with District-approved CEQA thresholds of significance. Therefore, since Project emissions would be less than the District-approved CEQA thresholds of significance, the Project would be consistent with the Clean Air Plan.

In summary, Project activities would be unlikely to conflict with or obstruct implementation of the applicable air quality plan for the following reasons:

- Project-related emissions would be less than the MBARD CEQA significance thresholds.
- Construction activities would incorporate dust suppression measures and would employ BMPs established by BAAQMD to reduce emissions.
- Air monitoring would be conducted during construction, if air monitoring data indicate that emissions are higher than action levels, adjustments in Project activities would be implemented to reduce emissions below action levels.

Therefore, the Project would result in a Less Than Significant Impact.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Impact Analysis:
Project-related construction activities would result in the following types of emissions, which are discussed below:

- Fugitive dust from ground-disturbing activities (PM_{10} and $PM_{2.5}$)
- O_3 precursors (ROG and NOx) and particulates (PM_{10}, and $PM_{2.5}$) from vehicle and construction exhaust

Fugitive Dust (PM_{10} and $PM_{2.5}$)
Construction emissions of fugitive dust (PM_{10}) can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions, and other factors.

Despite this variability, multiple feasible control measures can be reasonably implemented to reduce fugitive PM_{10} emissions. The MBARD does not specify construction BMPs, but the BAAQMD 2017 CEQA Guidelines (at Table 2-1 of that document; BAAQMD 2017a) state that a project's fugitive dust impact would be less than significant with implementation of BMPs described in the guidelines for dust control.

Vehicle/Construction Equipment Exhaust

Proposed Project activities that would generate air pollutant emissions include heavy construction equipment use, haul truck travel and construction employee commute trips. The impact from organic and toxic emissions from disturbed soil impact is discussed under (d) below. This discussion focuses on the criteria pollutant emissions from construction activities involved in the remediation.

The BMPs noted above (Table 3-4) are standard industry practice, and would be implemented to reduce fugitive dust impacts, to meet the emission requirements from the 2008 MBARD CEQA Guidelines. Therefore, based on the expected effectiveness of dust control measures, the short duration of field activities, and the emission estimated provided above in Table 3-5, Project-related impacts would be Less Than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. *Result in 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 that exceed quantitative thresholds for ozone precursors).*

Impact Analysis:
As shown in Table 3-2, the region in which the Project Site is located has been classified as non-attainment for O_3 and PM_{10} (MBARD 2017). NOx and ROGs are precursors to O_3. Thus, the pollutants addressed in this analysis – ROGs, NOx, and PM10 – are the same criteria pollutants and precursors discussed above in the baseline discussion.

As shown above in Table 3-5, Project-related emissions of these non-attainment pollutants would be less than significant under MBARD's Thresholds of Significance. Thus, the Project would not result in a cumulatively considerable net increase.

As presented in Item b. above, fugitive dust emissions would remain at a less-than-significant level with the implementation of particulate matter BMPs. Therefore, Project emissions would not be cumulatively considerable and cumulative impacts would be Less Than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. *Expose sensitive receptors to substantial pollutant concentrations.*

Impact Analysis:
The MBARD generally defines sensitive receptors as any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade 12 (K-12) schools; day-care centers; and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long-term care hospitals, hospices, prisons, and dormitories or similar live-in housing. There is no standard distance provided in CEQA guidelines to examine for nearby sensitive receptors; however, per ARB's 2005 Land Use Handbook, impacts associated with diesel particulate matter subside to ambient levels within 1,000 feet of a large emission source. The following facilities associated with sensitive receptors were considered to be in close enough proximity to the Project Site, such that assessment of potential impacts was appropriate:

- San Carlos School for grades transitional kindergarten through eighth: approximately 1,250 feet south of the Project Site.
- Residential Housing: approximately 2,000 feet to the west of the Project Site boundary. This area is zoned for medium density housing (City of Monterey 2019).

- Monterey Sports Center with short-term babysitting facilities: approximately 300 feet from the western boundary of the Project Site. Babysitting occurs at indoor locations only, is provided for up to 2 hours at a time and can only be utilized twice in 1 day. Although this site is not a standard day-care center, it is included to be conservative.
- Jacks Park baseball field: approximately 175 feet from the southern boundary of the Project Site.

The Project is not expected to expose these sensitive receptors to substantial pollutant concentrations for the following reasons:

- Project-related emissions would not lead to substantial pollutant concentrations, as demonstrated using the CalEEMod emissions estimation model, which found the emissions to be less than the MBARD CEQA significance thresholds (Table 3-5).
- A limited number of construction vehicles or equipment would operate simultaneously.
- The cleanup activities are short term and would be completed within approximately 5 months.
- Standard construction practices, such as using a water truck and covering soil stockpiles, would be used for dust suppression.
- The nearest sensitive receptor is beyond 1,000 feet from the proposed Project. Note there is a short-term babysitting facility and baseball field within 1,000 feet.

Therefore, impacts to sensitive receptors would be Less Than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. *Create objectionable odors affecting a substantial number of people.*

Impact Analysis:
The cleanup activities would involve the excavation and handling of MGP waste, which is commonly associated with odors. In addition, diesel exhaust from heavy equipment results in odors. Odor impacts are difficult to assess as the identification and degree of perceived odor is subjective. The majority of Project activities would be conducted at a substantial distance (more than 300 feet) from any sensitive receptors, as mentioned above, and would be short in duration (5 months). As noted in the Project Controls section of the Project Description, odor suppressant liquids or foams would be applied as needed during construction to address odors associated with the exposed excavation area or stockpiles. In addition, the measures taken to control dust emissions may also help control odors, if any are present.

Due to the nature of the Project scope of work and the Project controls that would be implemented, the odor impacts related to construction activities would be Less Than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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4. Biological Resources

Project Activities Likely to Create an Impact to Biological Resources:

Project activities that could directly and/or indirectly impact biological resources and the surrounding area include the following construction-related activities:

- Excavation/removal and stockpiling of contaminated soil, concrete, asphalt, brick, sediment, and/or wood using appropriate construction equipment in select areas (may include excavator, backhoe, bulldozer, jack hammer, or grader); and subsequent loading of the contaminated media onto dump trucks.
- Offsite transport and disposal or recycling of excavated soil, concrete, asphalt, brick, sediment, wastewater, and/or wood to appropriate facilities based on waste characterization and importation of clean soil.
- Site restoration, including backfill of all excavated areas.

Description of Baseline Environmental Conditions:

Habitat

Project Site

The habitat found at the Project Site is “Urban/Non-Vegetated” land (City of Monterey, 2016a). The majority of the Project Site is paved or covered with impermeable surfaces. The only vegetation at the Project Site is located around the north, east, and south perimeter of the property, adjacent to the sidewalk areas. The vegetation is comprised of vining plants growing up along the fence and structure walls, a few shrubs and small trees, and numerous planter boxes and pots containing ornamental plants. Project activities would be conducted on developed areas with commercial or industrial uses and no riparian habitat or other sensitive natural communities are present within the Project boundaries (United States Fish and Wildlife Service [USFWS] 2020).

Common urban species such as rat (*Rattus* spp.), raccoon (*Procyon lotor*), opossum (*Didelphis virginiana*), skunk (*Mephitis mephitis*), and western or eastern gray squirrel (*Sciurus spp*.) have the potential to use the Project Site for foraging and possibly living in portions of the property not utilized by humans. Common urban bird species such as mourning dove (*Zenaida macroura*), anna’s hummingbird (*Calypte anna*), or Brewer’s blackbird (*Euphagus cyanocephalus*) might potentially utilize an ornamental tree adjacent to the Project Site or the shrubs and vines present on the perimeter of the Site to nest in. Common urban wildlife species are accustomed to humans and human interaction and are not typically distressed by human activity; therefore, species found at the Project Site are not likely to alter breeding or foraging habits based on human activity associated with Project activities. Within the Project area, no viable habitat for species beyond those normally found in urban habitats exists and more attractive living and foraging options exist nearby.

Due to the completely developed nature of the Project Site, it is not considered a wildlife corridor that can be used for terrestrial migration.

Wetlands as defined under Section 404 of the Clean Water Act have not been identified at the Project Site, which is paved and therefore not supportive of wetland habitats. Additionally, according to the USFWS National Wetlands Inventory (NWI), there are no mapped wetlands overlapping with the Project Site and the closest wetland is approximately 422 feet to the northeast.

Surrounding Areas

There are a few ornamental trees adjacent to the north and east sides of the Project Site. The Site is immediately surrounded by roads to the north, east, and south, and by the Monterey Sports Center complex to the west. The closest un-paved area to the Project Site is Jack’s Park, a grass-covered baseball field located to the south beyond

East Franklin Street. The municipal beach and municipal park (Window on the Bay), approximately 200 feet to the northeast of the Project Site, contain open spaces along with areas vegetated with mature ornamental trees. These areas are more attractive to wildlife for foraging, breeding, and living in than the paved areas with scattered vegetation around the perimeter of the Project Site.

Special Status Species

Information was obtained regarding species of concern in the Project area from numerous previous reports for the Site, as well as a nine-quad search of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) for the Monterey, Seaside, Marina, Spreckels, Soberanes Point, Mount Carmel, Moss Landing, Salinas, and Carmel Valley quadrants (CDFW 2020).

Special status species that have been historically mapped by CNDDB as overlapping the Project Site or the immediate vicinity are discussed below.

Flora

- Hickman's cinquefoil (*Potentilla hickmanii)* is federally and state endangered, and listed as a California Native Plant Society (CNPS) Rare Plant Rank (RPR) 1B.1. Hickman's cinquefoil is seriously threatened by urbanization in California, and requires a habitat with coastal bluff scrub, meadows and seeps, or marshes. This type of habitat is absent from the Project Site.
- Jolon clarkia (*Clarkia jolonens*is) is listed as a CNPS RPR 1B.2. Jolon clarkia is threatened by grazing, foot traffic, and competition with non-native plants, and is found in chaparral, cismontane woodland, coastal scrub, and riparian woodland (CNPS 2020). These types of habitats are absent from the Project Site.
- Woodland Woollythreads (*Monolopia gracilens)*, is listed as a CNPS RPR 1B.2. Woodland woollythreads is threatened by development, and requires habitats with chaparral, woodland, North Coast coniferous forest, or valley and foothill grasslands (CNPS, 2020). This type of habitat is absent from the Project Site.

CNDDB Fauna

- Hoary bat (*Lasiurus cinereus*) is listed as a Western Bat Working Group (WBWG) high priority species. Hoary bat habitat may be found throughout California, with preferred roosting habitat with dense foliage of medium to large trees in woodlands and forests (Harris, 1990). This type of habitat is absent from the Project Site.
- Monterey shrew (*Sorex ornatus salaries*) is listed as an SSC. Monterey shrew inhabits riparian, tidal, and freshwater wetlands in lowlands adjacent to Monterey Bay (Collins, 1998). This type of habitat is absent from the Project Site.
- Yellow rail (*Coturnicops noveboracensis*) is listed as a CDFW species of special concern (SSC). Yellow rail require sedge marshes or meadows with moist soils or shallow standing water (DFG, 2008). The yellow rail could be observed passing by the Project Site, however habitat for foraging and nesting is not present.

Migratory birds protected by the Migratory Bird Treaty Act and California Fish and Game Code are have potential to nest in the vines and shrubs present around the perimeter of the Project Site. Nesting bird season is typically considered to start around February 15th and end around August 31st. As part of the Project, a nesting bird survey will be conducted by a biologist experienced in avian surveys prior to commencement of Project activities involving the removal of vegetation. Any active nests will be flagged and left intact during Project activities. Once the young have fledged the nest, the vegetation supporting the nest may be removed.

Regulatory Setting

The Project Site is covered by several plans and ordinances which contain provisions for biological resource protection including the following: PG&E's Multi-region Operations and Maintenance Habitat Conservation Plan (Multi Region O&M HCP), the City of Monterey General Plan, and the Monterey County General Plan. The City of Monterey Local Costal Program (LCP) does not have jurisdiction over the Project Site as the site is located outside of the LCP boundary (City of Monterey 2016b).

Multi Region O&M HCP

The Project Site is located within the Plan Area of the Multi-region Operations and Maintenance Habitat Conservation Plan (Multi Region O&M HCP). This HCP provides PG&E with federal take authorization for all gas and electric operation and maintenance activities in the Plan Area during the 30-year permit term. The Project Site falls under the HCP activity type *E4. Substation Maintenance*. The HCP has several areas of mapped habitat for

HCP covered species; Modelled Habitat, Hot Zones, and Map Book Zones. None of the mapped habitat areas overlap with the Project Site. There is Modelled habitat for the California red-legged frog (CRLF), California tiger salamander (CTS), and Smith's blue butterfly approximately 0.25-miles to the east of the Project site. Aquatic and riparian habitat necessary for CRLF and CTS is absent from the Project Site. Coastal dune, prairie, and scrub habitat necessary for Smith's blue butterfly is also absent from the Project Site. None of these HCP covered species are anticipated to be encountered at the Project Site.

City of Monterey General Plan

The General Plan for the City of Monterey (City of Monterey, 2016a) has six policies under two goals and two programs relating to biological resources:

- "Policy d.1 *Protect existing native plants and promote the use of locally occurring, native vegetation for public and private landscaping and revegetation efforts"*
- "Policy d.2 *Discourage the use of plant species on the California Exotic Pest Plant Council lists"*
- *"*Policy d.3 *Protect existing sensitive habitats by careful planning to avoid and/or mitigate significant impacts to habitat areas identified as having high and moderate biological values"*
- "Policy d.4 *Protect and manage habitats that support special-status species, are of high biological diversity, or are unusual or regionally restricted. Prepare biotic reports or habitat management plans as needed to ensure protection of habitat values"*
- "Policy d.5 *Reduce biotic impacts to a less-than-significant level on project sites by ensuring that mitigation measures identified in biotic reports are incorporated as conditions of approval for development projects. Compliance with the City Tree Ordinance is the mechanism that will be used to address impacts of tree removals. As mitigation for significant impacts, avoidance, replacement, restoration of habitats on – or off-site, or other measures may be required"* and
- "Policy d.6 *Within identified habitat areas with high biological value, the City will provide for a focused evaluation of areas identified as appropriate habitat for special-status species during the project review and approval process."*

The Project Site does not support areas with native vegetation or habitat for special status species, and is not identified as an area with high biological value or habitat.

Monterey County General Plan

As discussed in the Monterey County General Plan (Monterey County, 2010), the County has created ten long-term planning goals as part of the Conservation and Open Space Element guide portion of the General Plan. Goals OS-5 (Biological (Natural) Resources) outline conservation and preservation policies for areas not within the coastal zone, along with the protection of biological resources. Per the City of Monterey Coastal Zone Boundary map (City of Monterey, 2013), the Project Site is located immediately south of the coastal zone boundary, outside of the boundary limits. The following policies from the General Plan cover the Project Site:

- "OS-5.2 *The extent and acreages of the potentially suitable habitat for listed species shall be inventoried to the extent feasible and mapped in GIS. Conservation of species shall be promoted as provided in the Area Plans.*
- *"*OS-5.16 *A biological study shall be required for any development project requiring a discretionary permit and having the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or natural community, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species."*

Per a review of coastal zone maps, General Plan maps, and the Monterey County GIS Viewer, no priority conservation or protected habitat areas are present at the Project Site.

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Impact Analysis:
As described above, Project activities would be conducted on developed areas with commercial or industrial uses. The only habitat that exists within the Project Site is urban habitat, with sparse ornamental landscaping around the Site perimeter. Candidate, sensitive, or special-status species are not likely to be present at the Project Site and would not be impacted by Project activities including personnel, equipment use, vehicles, excavation and noise. Several special status species have been listed in the vicinity of or overlapping with the Project Site; however, the only potential habitat at the Project Site is for nesting birds.

Potential impacts to nesting birds include destruction of nests if vegetation housing their nest were removed during Project activities (i.e., potentially during driveway construction) or nest abandonment due to potential extended periods of high-levels of noise during Project activities. As part of the Project, a nesting bird survey will be conducted by a biologist experienced in avian surveys prior to commencement of Project activities. Common urban bird species that might nest at the Project Site are accustomed to human disturbance and activity, and it is unlikely that Project activities would cause nest abandonment or egg and nestling neglect while work is in progress. Should an active nest be discovered at the Project Site, a biological monitor will be required on-site during activities which could cause high-noise levels (i.e. demolition). Should a nesting bird(s) display signs of agitation, work will be paused to allow the bird(s) to re-acclimate to ambient urban noise levels. Re-start of Project activities after work is paused will be at the professional discretion of the biological monitor. Implementation of paused work and avoidance of removal of vegetation containing a nesting bird will result in less than significant impact for nesting birds.

In addition, Project controls would be implemented to avoid releases of soil or chemicals offsite into offsite habitats adjacent to the Project Site during cleanup actions so that candidate, sensitive, or special-status species in offsite habitats would not be impacted. For excavation activities, these controls would include BMPs for sediment and erosion control and dust mitigation as necessary. Therefore, the cleanup activities would not be likely to affect candidate, sensitive, or special-status species in offsite habitats.

Transport of materials removed from the Project Site nor imported to the area during Project implementation would occur on existing roadways. There is potential for wildlife species to be struck by moving vehicles associated with the Project, however by following speed limits and vehicle drivers keeping their eyes on the roadways, the chance of this occurring is minimal. Disposal/recycling of materials removed as part of the cleanup activities would occur at existing offsite facilities that are licensed for accepting waste.

As summarized above, cleanup activities, including excavation of outdoor soils, restoration of excavated areas, transportation, and disposal/recycling of contaminated materials would not be likely to affect candidate, sensitive, or special-status species. In consideration of the above, Project-related impacts would be Less Than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Impact Analysis:
The Project Site is paved and therefore not supportive of wetland, riparian, or other sensitive habitats. Project activities would be conducted on developed areas with commercial or industrial uses and no riparian habitat or other sensitive natural communities are present within the Project boundaries (USFWS 2020).

In addition, Project controls would be implemented to avoid releases of soil or chemicals offsite into offsite habitat adjacent to the Project Site during cleanup actions so that candidate, sensitive, or special-status species in offsite habitats would not be impacted. For excavation activities, these controls would include BMPs for sediment and erosion control and dust mitigation as necessary. Therefore, neither removal nor backfilling and restoration treatments would be likely to affect candidate, sensitive, or special-status species in offsite habitats, and there would be No Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.*

Impact Analysis:
Project activities would be conducted on developed areas with commercial and industrial uses. The closest surface water body to the Project area is the Pacific Ocean, immediately north of the municipal beach northeast of the Project Site. Wetlands as defined under Section 404 of the Clean Water Act have not been identified at the Project Site, which is paved and therefore not supportive of wetland habitats. According to the NWI, there are no mapped wetlands overlapping with the Project Site and the closest wetland is approximately 0.25 miles to the north/northeast. Transport of materials removed from the Site or imported to the Site during Project implementation would occur on existing roadways, and disposal/recycling would occur at existing facilities that are licensed for accepting waste (Table PD-2). Project controls, including BMPs for sediment and erosion control and dust mitigation, would be implemented to avoid releases of soil or chemicals offsite into the wetland habitats, 0.25 miles away, during cleanup actions so that no wetland would be affected. Therefore, no impacts to any federally protected wetlands are anticipated or planned and there would be No Impact.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.*

Impact Analysis:
Project activities would be conducted on developed land areas with commercial and industrial uses. No fish or wildlife species are known to reside or migrate within the Project Site. No areas within the Project Site are known to contain any migratory wildlife corridors (CDFW BIOS 2020). Since wildlife corridors are not present at the Project Site, Project activities are not anticipated to interfere substantially with the movement of wildlife and there would be No Impact.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. *Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*

Impact Analysis:
Project activities would be conducted on developed areas with commercial and industrial uses. As summarized below, the Project activities are not in conflict with local policies or ordinances presented in the baseline conditions section that cover the Project Site:

- City of Monterey General Plan – Proposed Project activities would not conflict with the General Plan as the Project would adhere to local policies and procedures as outlined above in regard to biological resources (City of Monterey 2016)
- Monterey County General Plan – Because the Project area is paved and supports only urban habitat, the Project would not conflict with the County goals and policies for the General Plan (Monterey County, 2010)

No notable biological resources exist within the Project Site; therefore, no aspect of the Project would conflict with local policies or ordinances protecting biological resources and there would be No Impact.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Impact Analysis:
The Project would occur within a paved, developed commercial/industrial area classified as Urban Land. No priority conservation or protected habitat areas identified in habitat conservation plans are present at the Project Site. Project activities are more than 100 feet from the Pacific Ocean.

Because the Project Site is not subject to the above-listed conservation plans, there would be No Impact.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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5. Cultural Resources

Project Activities Likely to Create an Impact to Cultural Resources:

Project activities that could potentially impact cultural resources include the following construction activities that could disturb soils containing cultural resources:

- Demolition of surface/subsurface features including compacted gravel, concrete foundations, vaults, slabs, shed with overhang, concrete block wall, and utilities (known and unknown), excavation/removal of contaminated soil, concrete, asphalt, and/or wood using heavy construction equipment (such as an excavator, backhoe, bulldozer, jack hammer, and/or grader)
- Subsurface sample collection involving the use of a drill rig

Description of Baseline Environmental Conditions:

Cultural resources consist entirely of Post-Contact resources as no pre-contact sites have been recorded in downtown Monterey. Historic resources within Monterey consist mainly of buildings dating to several periods of Monterey's history, from 1794 at the earliest to 1978 at the latest. Several of these buildings have been placed on the National Register of Historic Places although the majority are unevaluated. For approximately 86 years prior to the planned remediation activities, the Project Site contained structures associated with an electrical substation (ERM 2020a). Prior to that time, an MGP plant was located on the Project Site and immediate vicinity. Both the City and County of Monterey consider preservation of archaeological and cultural resources a major goal and priority. In keeping with this goal, the City of Monterey conducted a survey of cultural resources within the City; the results of this survey are provided in the *National Historic Landmark District and Downtown Area Context Statement and Reconnaissance Survey* in May of 2012. The goal of the survey was to further support the Downtown Monterey National Register Historic District and improve tourism in the area by documenting Monterey's historic resources and properties. The Project Site was contained within the footprint for this survey, which found that the Project Site is in an area of Monterey that has been used since at least the early 20th Century. The survey report also noted that the Project Site contains a historic Mission Revival style building (northeastern corner of the Project Site) that was constructed in 1905. In its 2012 study, the City of Monterey completed a California DPR 523 form for the building, but recorded it as 7N, which indicates that the building does not have a National Register status, but has been recommended for later evaluation. The cleanup actions at the Project Site have been intentionally designed to avoid this building; no excavation or other cleanup actions would be conducted on the northeastern corner of the Project Site where this building sits. As part of this project a Historical Evaluation (Jacobs 2020) was performed at the Project Site and is included as Attachment B.

Work activities are anticipated to consist of an average of 7 feet of excavation. These excavations will generally be restricted to artificial fill material, a heterogeneous unit consisting of poorly graded sand with silt and clay fines. The artificial fill is underlain by unconsolidated alluvium.

Analysis as to whether or not project activities would:

a. *Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.*

   Impact Analysis:
   A search of restricted records at the Northwest CHRIS Center identified no listed historic resources within the Project Site and the following four listed or eligible historic properties within ¼ mile of the Project Site:

   - The U.S. Customhouse
   - The Robert Louis Stevenson House
   - The Mary C.W. Black Studio House
   - The Spanish Royal Presidio and associated archaeological remains

   Within ¼ mile of the Project Site, the following additional historic resources are either not listed or unevaluated for inclusion on the National Register of Historic Places:

   - A historic building constructed in 1905
   - The Southern Pacific Railroad
   - A historic building constructed in the 1890s

- A historic building constructed in the 1930s
- A historic building constructed in 1949

The proposed Project activities do not involve modifications to significant historic structures; the cleanup actions at the Project Site have been intentionally designed to avoid the building on the northeastern corner of the Project Site that has been identified as a potential cultural resource (pending further evaluation). Project activities would not conflict with the Historic Zoning Ordinance (Chapter 38.15 of the Monterey Municipal Code). Additionally, the proposed cleanup actions would not result in an adverse effect, as defined by the Secretary of the Interior, on a Historical Building.

As noted in the Project Controls section of the Project Description, procedures would be implemented to minimize the potential for impacts to cultural resources during field activities, including notifying the field crew of the potential for encountering items of archaeological interest during drilling and excavation activities, and the appropriate procedures to follow in the event that artifacts or large deposits are encountered (i.e., immediately stop work, notify PG&E of the discovery, and leave the potential artifacts in place). PG&E would consult with DTSC and an archaeological contractor, who would determine if the materials represent protected historical resources under Section 15064.5 and what actions are to be taken before work can resume. Also, as detailed in the Historical Evaluation (Jacobs 2020) performed at the Substation, the shed and overhang (carport) located to the west of building was first observed in the 1956 Sanborn Fire Insurance map and is therefore not considered a significant historical structure. According to the 1962 Sanborn Fire Insurance map, electrical equipment bordered by walls to the north, east, and south (the equipment and walls are presently extant) is first observed. Walls also appear to enclose the site in the aerial (enclosure walls are presently extant).

In the Historical Evaluation, the significance of the former substation at 498 Del Monte Avenue and the PG&E Monterey Substation were determined by applying the procedures and criteria for California Register of Historical Resources (CRHR) eligibility. Notably, the CRHR criteria align with the City of Monterey Criteria for Historic Zoning (City of Monterey 2020). A resource is considered to be historically significant if it meets any of the criteria for listing in the CRHR (defined in Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 4852). In addition to these criteria, a resource must retain sufficient historic integrity to be considered historically significant. Integrity is the authenticity of the physical identity that is evidenced by the survival of characteristics that existed during the resource's period of significance. Based on site investigations and historic research included in the Historical Evaluation, the architectural historian recommended the building at 498 Del Monte Avenue and the PG&E Monterey Substation as not eligible for listing in the CRHR or considered a historical resource in accordance with the City of Monterey Criteria for Historic Zoning. With respect to historic integrity, the architectural historian noted that 498 Del Monte Avenue and the PG&E Monterey Substation do retain some aspects of their historic integrity.

The project's compatibility with the Secretary of the Interior's Standard (SOIS), specifically the Standards for Rehabilitation, were assessed as detailed in 36 CFR Part 68. The Standards for Rehabilitation acknowledge the need to alter a historic property to meet new uses or needs through compatible changes to the property, while also retaining the building's historic character. The SOIS can be used for any property type or use, and are not limited to ones that are considered historically significant. The Historical Evaluation concluded that the exterior walls are not historical and the improvements (i.e., the removal of a portion of the carport, improvements to the exterior walls, and reconstruction or relocation of the northern interior wall) would be considered consistent with the SOIS and Standards for Rehabilitation, since the property's key features, arrangements, form, and character would not be altered, and the changes would be compatible with its historic uses and function as a power-related building with extant elements from as early 1926. The removal of a portion of the carport, improvements to the exterior walls, and reconstruction of a new wall or relocation of the existing northern interior wall would not cause impacts to the property's overall context, appearance and feeling. These alterations would not impact the property's essential form and integrity, and its oldest element, the 1926 building at 498 Del Monte Avenue, would remain intact and unaltered.

While DTSC is providing regulatory oversight for remediation activities associated with this project, the California Public Utilities Commission (CPUC) regulates PG&E's substation upgrade activities. The California Constitution vests in the CPUC sole and exclusive approval jurisdiction over the construction, operation, and maintenance of public utility facilities. The CPUC, in its General Order 131-D Section III C, requires utilities under its jurisdiction to communicate with, and obtain the input of, local authorities regarding land use matters and obtain any non-discretionary local permits required for the construction and operation of these projects to ensure safety and compliance with local building standards. Since all the proposed work is within the existing substation yard and the changes would not result in an increase in capacity at the substation, the work would be subject to the provisions of General Order 131-D, Section C.

Based on the above considerations, because Project activities would not be conducted in or near historic structures and procedures are in place to minimize impacts on unknown buried archaeological resources, Project impacts on historical resources would be Less than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

Impact Analysis:
Based on a search of restricted records at the Northwest CHRIS Center, two sites were identified as known archaeological resources within the Project area or within ¼ mile of the Project Site; however, after further review it is believed that these sites no longer exist or have been destroyed. A summary of the two sites are included here below:

- P-27-000306 - A historic stone house in Old Monterey, constructed of Caramel rock in mud mortar, save for one foot of adobe one foot from top that was initially recorded in 1947. A review of Google Earth indicates that the area where the site is located has been the subject of urban development and the original soil A-Horizon has been destroyed. As such, the potential for P-27-00306 or any other intact cultural deposits to be present is low if not impossible.
- P-27-000398 – A historic house that is likely separate from the nearby Spanish Presidio that was initially recorded in 1953. When the site was first described, the archaeologist noted the possibility of destruction was "little further". A review of Google Earth indicates there was construction as recently as 2020 as well as other buildings built post-1950 indicating the site has likely been destroyed. As such, the potential for P-27-000398, or any other intact cultural deposits to be present is low if not impossible. In addition, there is a very low potential for significant intact archaeological deposits or otherwise unrecorded archaeological remains to be present at the Project Site due to previous ground disturbing activities associated with its historical use. No archaeological resources were encountered during remediation or development of the adjacent MGP properties. While it is possible Project activities could uncover materials greater than 50 years old, it is unlikely they will meet the Secretary of the Interior's standards for significance.

As noted in the Project Controls section of the Project Description, the field crew would be notified prior to the start of work regarding the proper procedures to be undertaken if significant archaeological resources or features were to be identified during Project activities. Specifically, work in the immediate vicinity would stop, the DTSC Project Manager would be notified, and archaeological experts would be consulted for an appropriate course of action. At that point, in consultation with DTSC and the California State Historic Preservation Officer, if potentially significant archaeological resources are identified, the area would be avoided until appropriate treatment of those resources could be conducted under California state guidelines.

Given the low likelihood of undisturbed archaeological resources being present at the Project Site and the procedures that would be undertaken to identify and avoid impacts to unexpected archaeological resources, cleanup activities are not likely to have an adverse effect to significant archaeological resources, and the impact would be Less than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact Analysis:
As discussed in the response to Item b., Project activities involve the disturbance of soils, which could affect paleontological resources, if present. However, the excavation activities would be generally limited to artificial fill, which by its nature would not contain undisturbed paleontological resources. Therefore, there would be No Impact to paleontological resources.

Conclusion:
☐ Potentially Significant Impact

☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis:
No known human burial sites are within the Project Site, and the presence of unrecorded interments is unlikely. As noted in the Project Controls section of the Project Description, the field crew would be notified prior to the start of work regarding the proper procedures to be undertaken in the event that human remains are encountered during Project work. Specifically, work within a 100-foot buffer of the discovery would stop immediately, and in accordance with applicable laws and regulations outlined within the California H&SC Section 7050.5 and Public Resource Code 5097.98, field staff would contact DTSC personnel. The County Coroner would be contacted. Human remains and associated soils would be left untouched until an appropriate course of action could be determined by the County Coroner. Therefore, the impact would be Less than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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6. Energy

Project Activities Likely to Create an Impact:

Project activities that could potentially impact energy consumption are construction and transportation activities that involve the use of fuel or electricity. Those activities include:

- Use of temporary facilities, including an office trailer and separate sanitary and wash facilities, at the Project Site.
- Advancement of soil borings for evaluation of the extent of contamination and waste characterization.
- Demolition of existing surface and subsurface site features, including compacted gravel, concrete foundations, vaults, slabs, shed with overhang, concrete block wall and utilities (known and unknown).
- Construction of a second access point (driveway) along Figueroa Street, pending on approval from the City of Monterey.

- Expansion (widening) of the existing access gate on Figueroa Street, pending on approval from the City of Monterey.
- Destruction of the two existing groundwater monitoring wells.
- Excavation of contaminated soil and other media to a depth of approximately 7 feet bgs on average across the Site using appropriate construction equipment (may include excavator, backhoe, bulldozer, jack hammer, or grader).
- Dewatering for excavation areas extending below the water table.
- Backfill of excavation with clean imported material or excavated material meeting the Site cleanup goals.
- Import of clean fill (up to a maximum of approximately 690 round trips by dump trucks) over the course of approximately 3 months.
- Transportation and disposal/recycling of excavated soil, concrete, asphalt, construction wastewater, and other debris offsite to appropriate facilities (up to approximately 710 round trips by haul trucks) over the course of approximately 3 months.

Description of Baseline Environmental Conditions:
In the recent past, the main function of the Project Site has been for energy transmission and distribution. For approximately 86 years prior to the planned cleanup activities, the Project Site contained structures associated with an electrical substation (ERM 2020a). Prior to that time, an MGP was located on the Project Site and immediate vicinity. In 2021, PG&E will temporarily de-energize the electrical substation and remove the above-grade equipment to prepare for installation of an upgraded electrical substation. The cleanup actions would be performed while the substation is inactive, and the Project Site is vacant; no Site-related operations using electricity or fuel would be occurring immediately prior to the start of Project-related activities. PG&E plans to meet the energy demands fulfilled by the former electrical substation with temporary offsite equipment until the new substation is operational.

Analysis as to whether or not project activities would:

a. *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Impact Analysis*:*
The proposed cleanup activities involve short-term construction activities and do not involve any changes in Site operations. The energy demand associated with cleanup activities would primarily involve fuel usage by construction equipment and waste/backfill transportation vehicles. There would be a limited demand for electrical power for lighting and office trailers; these electrical needs would be supplied by onsite generators. As noted in the Project Controls section of the Project Description presented earlier in this document, the following practices would be implemented by the field crew to reduce unnecessary or wasteful consumption of fuel:

- Minimizing idling time for all equipment, either by shutting off equipment when not in use or limiting the maximum idling time for all equipment to 5 minutes
- Properly maintaining contractor construction equipment and tuning it in accordance with manufacturer specifications
- Where practical, employing the following measures:
  - Substituting electrified equipment for diesel- and gasoline-powered equipment
  - Using alternatively fueled construction equipment onsite, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel
  - Avoiding the use of onsite generators by connecting to grid electricity or utilizing solar-powered equipment
- Conducting routine inspections of Project vehicles that would identify any wasteful leakage of fuel or oil

With implementation of these practices, there would be a Less than Significant impact.

Conclusion:

☐ Potentially Significant Impact

☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis:
The Project involves remediation of a contaminated Site located on private property and does not involve any long-term energy consumption. Therefore, there would be No Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:
ERM. 2020a. *Soil Remediation Feasibility Study and Remedial Action Plan, Former Monterey-1 Manufactured Gas Plant Electrical Substation, 498 Del Monte Avenue, Monterey, California.* 18 December.

7. Geology and Soils

Project Activities Likely to Create an Impact Associated with Geology and Soils:

Project activities that could potentially impact geology and soil conditions are construction activities that could alter the nature of ground surface conditions/topography or subsurface conditions, and thus could affect erosion rates or effects of geologic hazards. Those activities include:

- Excavation/removal and stockpiling of contaminated soil, concrete, asphalt, and/or wood over an approximately 26,130-square-foot area of the Project Site, to an average depth of 7 feet below grade.
- Dewatering of the excavation area, for soils below the water table. Groundwater extracted during dewatering would be containerized and either disposed of offsite or treated and discharged under permit to the City's sanitary sewer collection system, pending approval from Monterey One Water.
- Placement of backfill in all excavated areas to roughly match pre-excavation conditions.

Description of Baseline Environmental Conditions:
The topography of the Project Site is generally flat, with an elevation of about 14 feet above mean sea level (United States Geological Survey [USGS] 2020).

The Project Site is within the Coast Range Geomorphic Province of California, which is generally characterized by relatively low northwest-trending mountain ranges (between 2,000 to 4,000 feet elevation above sea level) and intervening valleys (Fuller et. al 2015, Kleinfelder 2019). They are a reflection of the dominant northwest structural trend of the bedrock in the region, running subparallel to the San Andreas Fault System. They are predominantly composed of thick late Mesozoic and Cenozoic (251 million years ago to present) sedimentary rocks.

The local geology of the Project Site can be characterized as an artificially filled tidal estuary (Parsons 2012) and mapped in an artificial fill unit that is surrounded by Pleistocene-age Ocean View coastal terrace (Clark et. al 1997). Three principal geologic units underlie the Project Site. From top to bottom, stratigraphically, these include (1) fill material, (2) unconsolidated natural deposits, and (3) bedrock. The artificial fill material is a heterogeneous unit consisting of poorly graded sand with silt and clay fines extending to approximately 8 feet bgs. The unconsolidated natural deposits consist primarily of Quaternary Older Alluvium. The bedrock consists of the Monterey Formation and Porphyritic Basement Rock (Parsons 2012). The Monterey Formation consists of three mappable units of very thick bedded and faintly laminated, diatomite with thin interbeds and lenses of chert (upper), underlain by thin-bedded and laminated porcelanite (middle), and underlain by thin-bedded semi-siliceous mudstone with interbedded siltstone (Clark et. al 1997). The porphyritic granodiorite of Monterey is medium-grained with orthoclase phenocrysts ranging from 3 to 10 centimeters long (Clark et. al 1997).

A recent geotechnical study included the advancement of a boring located beyond the southeast corner of the proposed excavation area, to a depth of 51.5 feet. The stratigraphic units observed in that boring consisted of fill,

poorly graded sand with variable amounts of silt, and fat clay (hardpan) (Kleinfelder 2019), consistent with the local geologic units of artificial fill material and unconsolidated natural deposits described above. The subsurface soil profile consists of the units listed below:

TABLE 7-1: Soil Boring Profile

Depth	Unit
0 to 5 inches	Asphalt
5 inches to 1 foot	Aggregate Base Rock
1 to 5.5 feet	Poorly Graded Sand with Gravel
5.5 to 10 feet	Medium Dense Silty Sand
10 to 13 feet	Very Loose Poorly Graded Sand
13 to 16 feet	Medium Dense Poorly Graded Sand with Silt
16 to 20 feet	Loose Poorly Graded Sand
20 to 36.5 feet	Very Stiff Fat Clay
36.5 to 48 feet	Very Dense Poorly Graded Sand with Silt
48 to 51.5 feet	Very Dense Poorly Graded Sand

The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) operates a website containing soil data across the country. Using this national database (USDA 2020), soil surveys for Monterey County indicate that soils at the Project Site are classified as Narlon loamy fine sand, 2 to 9 percent slopes (NcC). This series comprises of gently to moderately sloping soil that consists of loamy fine sand that formed on uplands in soft marine deposits (USDA 1978). Clayey soils in this mixture are not expansive in nature, are somewhat poorly drained, have a slow to medium runoff, and are a moderate erosion hazard (Monterey County 2020; USDA 1978). Two Atterberg Limits tests were run on selected samples from the geotechnical boring. One sample of poorly graded sand was obtained at a depth of 16 feet and determined to be nonplastic. The fat clay sample collected at 20 feet bgs had a liquid limit of 67 and plasticity index of 35, indicating highly expansive soils with a high potential for expansion (Kleinfelder 2019).

The California Geological Survey (CGS) considers the Project Site to have a potential for Moderate Ground Shaking Intensity during an earthquake (California Governor's Office of Emergency Services [Cal OES] 2020; Monterey County 2020b). The CGS and USGS Earthquake Shaking Potential for California anticipates lower levels of shaking during most earthquakes and shear wave velocity of upper 30 meters to be approximately 300 to 400 meters per second (Branum et al. 2016) due to the Site's distance from known active faults.

The Geologic Hazards Map for Monterey County shows the potential for liquefaction in areas across the county; the area containing the Project Site is classified on that map as having a variable potential for liquefaction (Monterey County 2020b). The CGS has not evaluated the Project Site for liquefaction hazards (CGS 2020a). The site-specific geotechnical study concluded that potentially liquefiable soil layers are present at depths between approximately 5 to 20 feet bgs (Kleinfelder 2019).

The area within the Project Site is mapped as having low landslide susceptibility (Monterey County 2020b). Historically, landslides and mudslides have not occurred within the Project Site, and no earthquake-induced or rainfall-induced landslide hazard zones have been identified within the Project Site based on the CGS Landslide Inventory (CGS 2020b). Additionally, the CGS has not evaluated the Project Site for seismic landslide hazards (CGS 2020a).

Under pre-cleanup conditions, the Site is paved and/or covered with gravel; no topsoil is exposed.

Seismic Characteristics

The Project Site is within a seismically active area. Seismically, the area is dominated by the San Andreas Fault system, which is composed of a branched network of generally northwest-trending strike-slip faults. Geologic, seismologic, and geodetic evidence indicate that this fault system partially accommodates the relative motion between the North American and Pacific tectonic plates. Published geologic maps indicate that no known or inferred active fault traces pass through the Project Site; no Alquist-Priolo Fault Zones are defined within the

Project Site (Monterey County 2020b). The Fault Activity Map of California (CGS 2010) illustrates nearby active faults, which are summarized in Table 7-2.

TABLE 7-2: Regional Faults

Fault	Approximate Distance (miles) and Direction from Site
Navy	0.85—northeast
Chupines	2—northeast
Cypress Point	4—southwest
Palo Colorado-San Gregorio	7—southwest
Monterey Bay	8—northeast
San Andreas	26—northeast

These faults are likely to have caused severe ground shaking at the Project Site in the geologic past and may have the potential to do so in the future. The 1906 Earthquake along the San Andreas Fault nearly destroyed the Hotel Del Monte, approximately 1 mile east of the Site (Monterey County OES 2020).

The USGS Fact Sheet (2008-3027) estimates that the probability of a magnitude 6.7 or greater earthquake occurring on any fault within the Bay Area from 2000 to 2030 to be 63 percent (USGS 2008). The USGS estimates the following probabilities of one or more magnitude 6.7 or greater earthquakes by 2037: 21 percent on the San Andreas Fault.

Analysis as to whether or not project activities would:

a. *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

   i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42).*

   Impact Analysis:
   No Alquist-Priolo fault zones have been identified within the Project Site. Therefore, there would be no Project-related impacts due to rupture of a known earthquake fault.

   Conclusion:

   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

   ii. *Strong seismic ground shaking.*

   Impact Analysis:
   Nearby faults are likely to have caused severe ground shaking at the Project Site in the past, which could also occur in the future. If the excavation were to be backfilled with materials more susceptible to seismic ground shaking than existing materials, it could result in increased potential for adverse effects to people or structures in those areas due to seismic shaking. However, restoration activities would include backfilling excavations in a manner consistent with the FS/RAP and RDIP. As noted in the Project Description, backfill materials would meet the requirements for substation construction and the standards and ordinances of the state and local governing authorities. Backfill material would be inert, non-expansive, free of organic matter, debris, rubble and other deleterious substances, and of such quality that it will compact thoroughly without excessive voids when watered and rolled. Because the pre-remediation subsurface soils were not deposited to these rigorous standards, these backfilling requirements should reduce the potential for effects due to seismic ground shaking. In addition, the engineering controls prescribed in the FS/RAP and RDIP would reduce the potential impacts of

seismic ground shaking while the excavations are open, and workers are present. Therefore, the potential Project-related impacts due to strong seismic ground shaking would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

iii. Seismic-related ground failure, including liquefaction.

Impact Analysis:
Seismic-related ground failure, including liquefaction, is potentially an issue in areas with susceptible soils, especially artificial fill material. Seismic-related ground failure, including liquefaction, is the rapid loss of soil cohesion due to substantial ground shaking. As noted in the baseline conditions discussion, the Project Site is likely underlain, at least partially, by such artificial fill material.

If the excavation were to be backfilled with materials more susceptible to seismic-related ground failure/liquefaction than existing materials, it could result in increased potential for adverse effects to people or structures due to ground failure. However, the excavation control measures proposed in the FS/RAP and evaluated in this Initial Study would include backfill with imported materials that comply with the FS/RAP and RDIP. As noted in the Project Description, backfill materials would meet the requirements for substation construction and the standards and ordinances of the state and local governing authorities. Backfill material would be inert; non-expansive; free of organic matter, debris, rubble and other deleterious substances; and of such quality that it will compact thoroughly without excessive voids when watered and rolled. Because the pre-remediation subsurface soils were not deposited to these rigorous standards, the backfill should be less susceptible to seismic-related ground failure. In addition, the engineering controls prescribed in the FS/RAP and RDIP would reduce the potential for ground failure while the excavation is open, and workers are present. Therefore, the potential Project-related impacts due to seismic-related ground failure would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

iv. Landslides.

Impact Analysis:
The Project vicinity is relatively flat; there is no history of landslides, and no known earthquake or rainfall-induced landslide hazard zones have been identified at the Project Site (CGS 2020a, 2020b). The Project would not introduce long-term topographic alterations. Therefore, the Project would have No Impact related to adverse effects due to landslides.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Result in substantial soil erosion or the loss of topsoil.

Impact Analysis:
Exposed topsoil is not present at the Project Site under baseline conditions. Project-related activities involve removal of impacted concrete, asphalt, wood, and/or soil.

Proposed activities involve disturbance and emplacement of soils, which would affect soil conditions. However, the Project area is relatively flat; therefore, there would not be a significant threat of soil erosion during cleanup

activities, even when localized paved surfaces are temporarily removed. BMPs would be applied during the removal actions, stockpiling, and backfill operations in accordance with a Project-specific Waste Management Plan and Erosion and Sediment Control Plan developed by the Contractor to reduce the potential for migration of soil beyond stockpile limits. The BMPs will be implemented in accordance with the City of Monterey's Storm Water Ordinance (Municipal Code Chapter 31.5 Article 2). Standard BMPs anticipated to be employed include:

- Use of silt fences, sandbag berms, hay bales, and grading to eliminate/reduce the movement of silt or sediment from the excavation area into storm water runoff
- Management of stockpiles generated during cleanup work to prevent the movement of silt into storm water runoff through: diversion of drainage from the stockpile areas; placement of sandbags and silt fencing; and sloping of stockpiles to encourage sheet flow
- Management of solid wastes (such as concrete, asphalt, and wood) from cleanup activities in accordance with the Project-specific Waste Management Plan to prevent contamination of storm water runoff
- Use of spill control measures and standard procedures for hazardous materials storage and vehicle fueling in accordance with a Project-specific Spill Prevention and Response Plan to be prepared and implemented by the Contractor to manage hazardous wastes and materials to reduce the potential for spills and offsite discharge via storm water

Construction activities would comply with City permit requirements and other local, state, and federal air quality requirements related to the above issues. After excavation backfilling is completed, there would be a limited potential for soil erosion or loss of topsoil. The excavation area would be improved with installation of an upgraded electrical substation after cleanup activities are completed. Therefore, Project-related impacts would be Less Than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.*

Impact Analysis:
The Project Site has been developed with constructed structures for several decades; no issues related to soil instability have been observed. As noted in the baseline conditions discussion, the Site is in an area underlain by artificial fill material that could be susceptible to liquefaction. However, given the relatively flat current terrain in the Project Site and the fact that the site topography would be returned to original grade after remediation is complete, there would be no risk of offsite landslides associated with the Project.

The excavation would be designed with sloping or shoring as necessary to protect the stability of the adjacent soils. Sidewall sloping and/or shoring would be used in excavations deeper than 4 feet bgs to minimize the risk of cave-ins. As such, the risk of creating soil instability during the proposed work is negligible. Excavations would be backfilled to the original (pre-excavation) relatively flat ground surface with clean imported fill materials in accordance with the FS/RAP and RDIP, and meeting state and local requirements as discussed above. These requirements would result in conditions within the excavated/backfilled area that would likely be more stable than the original conditions. As such, the proposed cleanup actions would have No Impact on the likelihood for landslide, lateral spreading, subsidence, liquefaction, or collapse.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.*

Impact Analysis:
As noted in the baseline conditions discussion, expansive soils are not likely to be present at the Project Site at depths above the water table. If present in the planned excavation area, such expansive soils would be

removed and replaced with engineered fill. The excavations would be backfilled to their original grade with clean imported fill materials in accordance with the FS/RAP and RDIP, and meeting state and local requirements as discussed above. These requirements would result in conditions within the excavated/backfilled area that would be less likely to exhibit shrinking and swelling than the original conditions. Therefore, Project-related impacts associated with expansive soils would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. *Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater.*

Impact Analysis:
No septic tanks or other underground wastewater disposal systems are to be constructed or modified as part of the Project activities. Sewers are available for disposal of water in the Project area. Groundwater extracted for dewatering of deeper excavation areas would be containerized in a storage tank, and either disposed of offsite or treated and discharged under permit to the City's sanitary sewer collection system, pending approval from Monterey One Water. Therefore, the Project would have No Impact related to the use of site soils for septic tanks or other wastewater systems.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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8. Greenhouse Gas Emissions

Project Activities Likely to Create an Impact on Greenhouse Gas (GHG) Emissions:

Project activities that could potentially impact GHG emissions are construction activities involving the use of hydrocarbon-fueled remediation equipment or transport vehicles, and passenger vehicles transporting remediation workers to the site. These activities include:

- Demolition of existing surface and subsurface Site features including compacted gravel, concrete foundations, vaults, slabs, shed with overhang, concrete block wall, and utilities (known and unknown).
- Construction of a second access point (driveway) along Figueroa Street, pending approval from the City of Monterey.
- Expansion (widening) of existing access gate on Figueroa Street, pending approval from the City of Monterey.
- Excavation/removal and stockpiling of contaminated soil, concrete, asphalt, and/or wood using appropriate construction equipment in select areas (excavator, backhoe, bulldozer, jack hammer, or grader); stockpiling as needed, and loading the contaminated media onto dump trucks.
- Offsite transport and disposal/recycling of excavated soil, concrete, asphalt, wood and waste water to appropriate facilities (based on waste characterization), and importation of clean soil. These excavation activities would require up to approximately 1,400 round trips to transport materials offsite and import material onsite; this level of Project-related traffic would occur over the course of approximately 5 months.
- Placement of backfill into excavated areas.

The major category of GHG emissions resulting from human activities is carbon dioxide (CO_2) from fossil fuel combustion. There are several other gases that contribute to global warming, including methane, nitrous oxide, sulfur hexafluoride, perfluorocarbons, and hydrofluorocarbons. However, the majority of GHG emissions associated with the Project would be CO_2 from diesel-fueled heavy equipment and trucks; therefore, this discussion in this section focuses on CO_2.

Description of Baseline Environmental Conditions:
GHGs are pollutants with impacts causing global concern unlike criteria air pollutants or toxic air contaminants that are pollutants of regional and/or local concern. GHGs contribute to climate change by allowing ultraviolet radiation to enter the atmosphere and warm the Earth's surface, but they also prevent some infrared radiation from the Earth from escaping back into space. The largest anthropogenic source of GHGs is the combustion of fossil fuels, which results primarily in emissions of CO_2. Mitigating or reducing GHG emissions is critical to slowing climate change. In 2017, the most recent year for which data are available, GHG emissions in the State of California were about

424,100,000 metric tons of CO_2e[1] (CARB 2019). The transportation sector is the largest contributor, producing 41 percent of the state's total emissions in 2017. Industrial sources are the second largest contributor at 24 percent (CARB 2019).

Analysis as to whether or not project activities would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis:
During construction, the Project would contribute GHG emissions through direct CO_2 emissions from vehicles, heavy equipment, and a generator. Calculations of CO_2 emission estimates for the Project can be found in Attachment C and are summarized in Table 8-1.

Table 8-1. Greenhouse Gas Emissions for Heavy Construction Equipment Use and Haul Truck Travel

Pollutant	Average Annual Construction Emissions	MBARD CEQA Threshold
CO_2 (metric tons/yr)	383	10,000

Note: Emissions calculated using the CalEEMod emissions estimation model.

Based on the CalEEMod modeling discussed in the Air Quality section, total annual CO_2 emissions for the Project's construction phase are estimated to be 383 metric tons. MBARD has not established Thresholds of Significance for construction-related GHG emissions that would apply to this Project.

In the absence of construction-related Thresholds of Significance, the operational-related maximum annual Threshold of Significance for land use projects (10,000 metric tons per year CO_2e) (MBARD 2016) is used as a point of comparison for assessing Project-related impacts in this Initial Study. The Project's calculated annual CO_2 emissions are well below this threshold. Annual CO_2 emissions would be further reduced with implementation of the BMPs described in the Air Quality section. The Project would not create a new permanent stationary or non-stationary source of emission, including GHG emissions as defined by MBARD guidelines. Therefore, Project impacts related to GHG emissions would be Less than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis:
As noted in the Project Control section of the Project Description, activities such as minimizing idling times, proper maintenance of construction equipment, and preferential use of electric or alternate fueled equipment over gasoline/diesel-powered equipment would be employed as possible during Project implementation to reduce GHG emissions.

As discussed in the discussion for Item a., Project-related emissions would be below significance thresholds. As such, this Project would not conflict with the Climate Action Plan (City of Monterey, 2016a), and there would be a Less than Significant Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact

[1] The term CO_2e is used to represent all GHG emissions, expressed as the impact of each different GHG in terms of the amount of CO_2 that would create the same amount of warming.

☐ No Impact

References Used:

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9. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact Associated with Hazards and Hazardous Materials:

Project activities that could potentially create a significant hazard to the public or environment are construction activities, during which the presence and operation of heavy equipment could pose hazards or interfere with emergency response activities, or hazardous materials could be exposed or released. Such activities include:

- Advancement of 123 soil borings for evaluation of the extent of contamination and waste characterization
- Demolition of existing surface and subsurface Site features including compacted gravel, concrete foundations, vaults, slabs, shed with overhang, concrete block wall, and utilities (known and unknown). A hazardous materials survey will be completed pre-demolition to confirm the presence of suspect asbestos-containing material or other hazardous material (lead-based paint, PCB caulking, etc.).
- Excavation/removal of contaminated soil, concrete, asphalt, and/or wood using appropriate construction equipment (may include excavator, backhoe, bulldozer, jack hammer, or grader). Excavated material will be either direct loaded onto dump trucks or stockpiled, if appropriate.
- Because the depth to groundwater ranges from 6.5 to 8 feet bgs, dewatering would likely be required for deeper excavations. Groundwater extracted during dewatering would be containerized and either disposed of offsite or treated and discharged under permit to the City's sanitary sewer collection system, pending approval from Monterey One Water.
- Offsite transport and disposal/recycling of excavated soil, concrete, asphalt, wastewater, and/or wood to an appropriate facility based on waste characterization. Up to approximately 10,000 cubic yards/14,000 tons of soil and demo material would be excavated (exact volume to be determined based on pre-excavation characterization) and up to approximately 100,000 gallons of wastewater generated and transported offsite (up to approximately 710 round trips by haul trucks or vacuum truck) in the event Project Site is not authorized to discharge.
- Backfill of excavation with clean imported material. If excavated material is found to meet the Site cleanup goals, material may be segregated and re-used as backfill. Remediation activities would involve the transportation of up to approximately 10,000 cubic yards/14,000 tons of imported clean fill (up to approximately 690 round trips by dump trucks). The actual number of truck trips would be reduced if excavated materials are found to be suitable for use as backfill.

Description of Baseline Environmental Conditions:
The materials currently present at the Project Site that would be the subject of removal actions are soil, concrete, asphalt, and/or wood. The primary chemical COCs within these materials include PAHs, PCBs, petroleum hydrocarbons, and metals (specifically arsenic and lead) (ERM 2020a).

The California Water Resources Control Board GeoTracker database contains records for sites that impact, or have the potential to impact, water quality in California and DTSC EnviroStor database contains records for sites that have known or potential contamination; as well as facilities permitted to treat, store, or dispose of hazardous waste.

The Project Site is listed as an active voluntary cleanup site on the EnviroStor database due to soil impacts related to the former MGP. Additionally, two open hazardous materials sites currently undergoing investigation and/or remediation are within ¼ mile of the Project Site, as identified by the GeoTracker and EnviroStor databases. An additional seven closed sites are also within ¼ mile of the Project Site. Historical operations at these sites may have resulted in the presence of contaminated soil or groundwater. The location, type, and status of hazardous material sites listed in the GeoTracker and EnviroStor databases in the Project vicinity are summarized in Table 9-1.

Table 9-1: Hazardous Materials Sites in the Project Vicinity

Site Name	Address	Distance from Project Site (miles)	Site Status
Former Russo's Marine Fueling Station	Northeast Corner of Del Monte Avenue and Figueroa Street, Monterey, CA	0.04	Open – RWQCB Cleanup Program Site
Cochran Autoshop	417 Figueroa Street, Monterey, CA	0.04	Closed – LUST Cleanup Site
Unknown site	550 E. Franklin Street, Monterey, CA	0.05	Closed – LUST Cleanup Site
BP #11168 (Former)	312 Del Monte Avenue, Monterey, CA	0.07	Closed – LUST Cleanup Site
Bianchi Site	600 E. Franklin Street, Monterey, CA	0.12	Closed – LUST Cleanup Site
Washington Mutual Bank – Monterey	468 Washington Street, Monterey, CA	0.15	Open – RWQCB Cleanup Program Site
Mission Mortuary	450 Camino El Estero, Monterey, CA	0.16	Closed – LUST Cleanup Site
Dougherty's Auto Paint	288 Pearl Street, Monterey, CA	0.17	Closed – LUST Cleanup Site

LUST = Leaking Underground Storage Tank

The nature and extent of chemical occurrence associated with the two active sites within ¼ mile of the Project Site is summarized below:

- Former Russo's Marine Fueling Station (0.04 mile northeast and downgradient of the Project Site): Fuel-related compound (benzene, diesel, gasoline, toluene) impacts are present in soil and groundwater. Remediation activities consisting of soil excavation, soil vapor extraction, and free product removal have been performed at the site since the mid-1980s. Site groundwater monitoring is performed on a quarterly basis.
- Washington Mutual Bank (0.15 mile southwest and upgradient of the Project Site): VOC impacts are present in soil and groundwater. Soil remediation consisting of excavation and reagent application was performed in 2010. Site groundwater monitoring is performed on a semiannual basis. The site is currently under review for case closure.

The additional seven closed sites located within ¼ mile of the Project Site include LUST cleanup sites where petroleum hydrocarbons (gasoline, waste oil, motor oil, heating oil) were reportedly released into soil and/or groundwater. Cleanup actions, such as tank removal, were completed at several of these sites before case closure.

The San Carlos School at 450 Church Street is the only school within ¼ mile of the Project Site that serves students younger than 18 years old. The Keller Medical Institute at 288 Pearl Street is approximately 0.18 mile from the Project Site; however, this school does not serve students under 18 years of age.

The closest public use airport to the Project Site is Monterey Regional Airport, approximately 1.7 miles southeast of the Site. The Project Site is within the Airport Land Use Compatibility Plan footprint for this airport (Monterey County Airport Land Use Commission 2019). One private airstrip (heliport), Seaside Superbikes Heli Field, is approximately 0.6 mile southwest of the Project Site.

The County of Monterey has prepared an Emergency Operations Plan to establish a framework for managing and coordinating emergency operations in the County (Monterey County Office of Emergency Services [OES] 2014). This Plan outlines the procedures that would be followed in the event of an emergency to save lives and reduce injuries, prevent/minimize property damage, and protect the environment.

Naturally occurring asbestos (NOA) is associated with ultramafic, metamorphic rocks. The soils underlying the Project vicinity are fill material consisting of sands with varying amounts of silts and clays. The geological units underlying the fill material consist of alluvium, sedimentary rocks of the Monterey Formation, and porphyritic

granodiorite basement rock (Parsons 2009); these types of rock do not contain NOA. Consistent with this conclusion, no rocks likely to contain NOA are present in the Project area as illustrated on the map entitled *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California* (USGS 2011).

Analysis as to whether or not project activities would:

a. *Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.*

Impact Analysis:
The Project would involve the excavation/removal, stockpiling, and offsite disposal/recycling of soil, concrete, asphalt, plastic sheeting, groundwater, and/or wood that could contain PAHs, PCBs, petroleum hydrocarbons, metals, and/or asbestos. Excavated material will be either direct loaded onto dump trucks for disposal or stockpiled, as needed pending disposal. Soil to be excavated beneath the water table (present at approximately 6.5 feet bgs) would require construction dewatering; this groundwater, which could contain Site-related contaminants, would be temporarily stored onsite pending disposal. These activities would occur over a period of limited duration (approximately 5 months). Historical operations in the vicinity of the Project Site could have resulted in the migration of chemicals in groundwater beneath the Project Site; however, those impacts are not likely to be significant due to the completion of cleanup actions and/or case closure at those sites by the RWQCB, as further discussed under Item d.

At concentrations in excess of regulatory criteria, materials removed as part of cleanup activities would constitute hazardous waste. Removed materials and any construction-related waste, including wastewater generated during cleanup activities and groundwater extracted during excavation dewatering, would be managed as a potentially hazardous waste in accordance with the Project-specific *Waste Management Plan* (Appendix C of the RDIP) until characterization is completed. If waste characterization results indicate that excavated materials are hazardous waste, these materials would be managed and disposed of as hazardous waste as described below. As noted in the Project Controls section of the Project Description, applicable Site controls would be implemented to protect worker health during these activities in accordance with a site-specific HASP. During cleanup activities onsite, protection of workers (the individuals in most direct contact with the potential hazardous waste) also provides protection to the general public, who would be excluded from the work areas and would therefore not come into direct contact with these materials. Site controls would also be consistent with standard BMPs, hazardous waste regulations, and other applicable regulations and permits.

Excavated/removed materials would be transported by truck to an appropriately licensed landfill for treatment (if required) and disposal/recycling (Table PD-2 in the Project Description). If hazardous materials were to be released from these trucks during transport in the form of dust or spillage, the public or ecological receptors could be exposed to those materials, or contamination could spread to a broader area. As noted in the Project Controls section of the Project Description and specified in the *Waste Management Plan*, soils will be wetted prior to excavation or loading to suppress dust, and all truckloads of excavated/removed materials would be covered. In addition, those trucks would follow a designated route to limit impacts to residents and businesses. Before the trucks exit the Site, they will be required to drive through the truck wash/decontamination area to prevent tracking Site soils onto public roadways. Prior to loading for transport, the excavated/removed materials would be characterized to determine appropriate disposal or treatment requirements. In this way, the waste would be transported directly to an appropriate disposal/recycling facility that is licensed to accept the waste, thus minimizing the amount of time the waste is in transit. Furthermore, by using a properly licensed facility designed for the waste in question, the potential for releases from that facility would be minimized. Potential treatment options, if necessary, would be performed at the disposal facility and may include solidification/stabilization for metals and petroleum hydrocarbon-contaminated soil and incineration for PAH and PCB-contaminated soil.

As also noted in the Project Controls section of the Project Description, BMPs would be implemented to reduce the potential for migration of hazardous materials from the stockpile area (either in air, surface water, or surface soils/pavement), and air monitoring would be performed to detect possible offsite impacts. The *Waste Management Plan* includes additional measures that would be implemented for stockpiled PCB wastes and asbestos-containing materials. Stockpiled wastes would be removed from the Project Site within 90 days, and would be subjected to weekly inspections while onsite. In addition, a Project-specific Erosion and Sediment Control Plan prepared by the Contractor would include the specific procedures to be implemented to reduce the potential for migration of hazardous materials offsite.

Excavated/removed materials from the Site meeting the classification of hazardous wastes would be transported under hazardous waste manifests by registered hazardous waste haulers holding a currently valid registration issued by DTSC and meeting federal requirements imposed by the Department of Transportation (DOT) and USEPA under the Resource Conservation and Recovery Act (RCRA). Haulers are also subject to California hazardous waste law requirements pertaining to hauling of hazardous wastes (H&SC §25100 et seq. and §25163 et seq.; 22 CCR §66263.10 et seq.; 13 CCR §1160 et seq.; California Vehicle Code §12804 et seq. and §31300 et seq.), which are implemented and enforced by DTSC, as well as the California Highway Patrol, Department of Motor Vehicles, local sheriff, and police agencies who have general responsibilities for the transportation of hazardous waste on state and local roadways. Truck inspections will be conducted to confirm: 1) that the vehicle is in safe operating condition; and 2) the material being transported is secured and will not be released from the vehicle during transport.

Groundwater extracted during dewatering would be containerized and either disposed of offsite or treated and discharged under permit to the City's sanitary sewer collection system, pending approval from Monterey One Water. Extracted groundwater would be chemically analyzed to determine appropriate disposal or treatment requirements. Procedures and standards to manage dewatering effluents would be established in a Project-specific Dewatering Plan developed and implemented by the Contractor (ERM 2020a).

Additional hazardous materials associated with the proposed cleanup actions include fuels and lubricants brought on the Site periodically following standard construction practices and safety standards. Transportation of fuel and lubricants would conform to state and federal requirements for hazardous materials transportation. Site activities would be performed consistent with a site-specific HASP.

Project-related transport of hazardous waste would occur during a short time period (approximately 3 months). Furthermore, as noted above, the management of potentially contaminated waste and adherence to Site controls and plans, and regulatory requirements related to transport of hazardous waste reduce the potential for significant hazard to the public or the environment to result from the Project. Therefore, the potential hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact Analysis:
Project activities would be conducted in accordance with the Site-specific HASP and Project Plans to minimize the potential for accidental releases of hazardous materials during cleanup activities. With the correct implementation of these plans, in the event that a hazardous release occurs, potential impacts to the public or environment should be minimized. All trucks would be registered hazardous waste haulers licensed by the State of California and trained to deal with emergencies. The potential for releases during transport would also be reduced by the performance of truck inspections, which would be conducted to confirm: 1) that the vehicle is in safe operating condition; and 2) the material being transported is adequately secured by a cover, and will not be released from the vehicle during transport. Asbestos-containing waste, scrap, debris, bags, containers, equipment, and contaminated clothing consigned for disposal would be collected and disposed of in sealed, labeled, impermeable bags/sheeting or other closed, labeled, impermeable containers.

Potential upset conditions that could occur during cleanup activities and could involve the release of hazardous materials (fuel or excavated/removed materials from the Site) include fire, fuel spills, hydraulic fluid leaks, and accidents and incidents commonly associated with construction-related activities. The hazards due to these conditions or situations would be managed in accordance with a Project-specific Spill Prevention and Response Plan prepared by the Contractor, through BMPs such as:

- Proper maintenance and operation of the machinery and vehicles, to reduce the potential for fuel releases, or malfunctions that could result in spillage of hazardous materials excavated/removed from the Site
- Proper storage of fuels with secondary containment in the equipment storage area or adjacent to a spill kit utilizing drip pans, to reduce the potential for releases

- Storage of wastewater with extracted groundwater in a storage tank or in labeled drums placed on pallets, within secondary containment
- Calling 811 prior to ground disturbance activities as required by law, and marking of underground utilities to avoid unexpected encounters with utilities that could release contaminants such as oil pipelines and sewer lines
- Enforcement of safe work practices and other safety provisions as specified in the HASP

Therefore, by employing the practices noted above and by following local, state and federal requirements related to hazardous waste management, the potential hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.*

Impact Analysis:
The presence of schools in a project area is typically given special consideration because children, which are sensitive receptors, congregate in schools for an extended duration on weekdays, when project work is typically conducted. The nearest school (students under 18 years of age) to the Project Site is a TK-8 school (San Carlos School) at 450 Church Street, approximately 0.25 miles away.

The Project cleanup activities would involve the excavation/removal, stockpiling, and offsite disposal of concrete, asphalt, and/or wood containing PAHs, PCBs, metals, and/or petroleum hydrocarbons. Groundwater extracted during dewatering would be containerized and either disposed of offsite or treated and discharged under permit to the City's sanitary sewer collection system, pending approval from Monterey One Water. At concentrations in excess of regulatory criteria, materials removed as part of cleanup activities would constitute hazardous waste.

Excavated/removed materials would be transported by truck to an appropriately licensed waste disposal facility for treatment (if required) and disposal/recycling. If hazardous materials were to be released from these trucks during transport in the form of dust or spillage, the public could be exposed to those materials. To reduce this potential, all trucks would be covered, and truck exteriors/tires will be cleaned as needed to avoid soil tracking off the Site onto public roadways. Truck inspections will be conducted to confirm: 1) that the vehicle is in safe operating condition; and 2) the material being transported is secured and will not be released from the vehicle during transport. Excavated material will be either direct loaded onto dump trucks for disposal or stockpiled, as needed pending disposal. Stockpiled materials would be managed in accordance with the Project-specific Waste Management Plan and Erosion and Sediment Control Plan developed by the Contractor to reduce the potential for migration of hazardous materials from the stockpile area (either in air, surface water, or surface soils/pavement), and air monitoring would be performed to detect possible offsite impacts.

Additional hazardous materials involved in the Project include fuels and lubricants brought on the Site periodically following standard construction practices and safety standards. Transportation of fuel and lubricants would conform to state and federal requirements for hazardous materials transportation. Site activities would be performed consistent with a Site-specific HASP.

Adherence to these plans should minimize the potential for hazardous emissions from the Project Site to affect workers or students at the nearby school. Waste transport is also unlikely to emit hazardous emissions or to result in releases of hazardous materials that would affect workers or students at the school because regulatory requirements related to transport of hazardous waste and best practices (covering the load) reduce the potential for releases during transport.

Therefore, the potential for the Project to result in impacts related to hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

Impact Analysis:
The Project Site is identified as an active site on the above-referenced list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List). In the long term, the proposed cleanup activities would reduce hazards by removing contaminated material from the Site. In the short term, during cleanup activities, the potential for related hazards would increase because impacted materials are being disturbed. As noted in the prior items, the management of potentially contaminated waste generated during cleanup activities, and adherence to site controls/plans and regulatory requirements related to transport of hazardous waste reduce the potential for significant hazard to the public or the environment to result from the Project.

As is often the case in urban settings, historical operations in the vicinity of the Project Site may have resulted in the presence of contaminated sediments, soil, soil vapor, or groundwater. If such contamination were to be encountered during excavation activities, it could result in exposures of workers or the general public to contaminants. As summarized above, the GeoTracker and EnviroStor databases identified nine hazardous material sites within ¼ mile of the Project Site. Two of these sites currently have an “open” status and involve VOC and fuel-related compound impacts in soil and groundwater. Remediation activities have been completed at these two sites and site groundwater monitoring is currently being performed. The remaining seven hazardous material sites within ¼ mile of the Project Site have a closed status and involve releases of petroleum hydrocarbons (gasoline, waste oil, motor oil, heating oil) to soil and/or groundwater. Cleanup and remediation actions, such as tank removal, were completed at several of these closed sites before case closure. Based on data available on GeoTracker and EnviroStor, soil contamination associated with the identified hazardous material sites in the Project vicinity would be localized and would not be encountered beyond the footprints of those respective sites. Groundwater impacts associated with these sites may be possible, but are not likely to be significant, due to completion of cleanup and remediation actions and/or case closure by the RWQCB. Project activities could potentially encounter contaminated groundwater, if present, based on excavation depths (to be determined based on additional site characterization, with clean base samples extending to an average of 7 feet bgs). In the event that shallow groundwater is encountered during excavation activities, dewatering of the excavation site would be required. Extracted groundwater would be chemically analyzed to determine appropriate disposal or treatment requirements. Procedures and standards to manage dewatering effluents would be followed in accordance with a Project-specific Dewatering Plan.

Adherence to the Site-specific Project Plans referenced in this section should minimize the potential for a significant hazard to be posed to the public or the environment from the proposed cleanup actions. The potential for Project activities to result in an increased human health risk due to hazardous materials is therefore expected to be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Impact Analysis:
The Project Site is within the Airport Land Use Compatibility Plan footprint for Monterey Regional Airport, which is approximately 1.7 miles southeast of the Site (Monterey County Airport Land Use Commission 2019). The Federal Aviation Administration (FAA) requires notice of construction for developments over 200 feet tall within Airport Land Use Plan footprints. Equipment used during Project activities would not exceed the 200-foot height limit when extended to the heights needed during cleanup activities, and would not extend above the walls

surrounding the Project Site. Project-related equipment would be comparable in size and height to other construction equipment commonly operating in the Project area. Project cleanup activities include excavation/removal, stockpiling, and offsite disposal/recycling of soil, concrete, asphalt, brick, plastic sheeting, and/or wood, which would occur close to or below ground surface. Therefore, potential impacts related to aviation-related safety hazards as a result of Project activities would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Impact Analysis:
The FAA has specific requirements for notification of construction in the vicinity of heliports available for public use. One private airstrip (heliport), Seaside Superbikes Heli Field, is approximately 0.6 mile southwest of the Project Site. As described above, equipment used during Project activities would be comparable in size and height to other construction equipment commonly operating in the Project area and would pose no greater risk than current conditions. Therefore, potential impacts related to aviation-related safety hazards as a result of Project activities would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

g. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact Analysis:
Emergency actions in the vicinity of the Project would be managed by the County of Monterey in accordance with the *Emergency Operations Plan* prepared to establish a framework for managing and coordinating emergency operations in the County (Monterey County OES 2014). The Project Site is adjacent to Del Monte Avenue, Figueroa Street, and E. Franklin Street, which are not identified as emergency evacuation routes by the Safety Element of the Monterey County General Plan (Monterey County 2010a). The Project activities could temporarily affect vehicular traffic along Figueroa Street, where trucks and equipment would enter and exit the Site; however, the amount of vehicular traffic that would be added to this street and other main roadways in the Project vicinity at any given time would be relatively minor (an average of three to four truckloads leaving/entering the Project Site per hour).

Based on the above considerations, Project activities would not affect: 1) the ability of emergency response personnel to access areas in the vicinity of the cleanup sites, or 2) the accessibility of evacuation routes. Therefore, Project activities would have No Impact on the implementation of emergency response procedures or emergency evacuation measures.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

h. Result in human exposure to Naturally Occurring Asbestos?

Impact Analysis:
No rocks likely to contain NOA are present in the Project area. The subsurface material in the depths being targeted for excavation is fill material (see Section 6.0 Geology and Soils), and soils/rocks that may contain NOA have not been observed.

As part of the proposed activities, an asbestos inspection of the onsite shed and block wall would be performed, prior to their demolition. If the shed and block wall are found to have asbestos-containing materials, asbestos abatement and removal would be performed prior to demolition activities. BMPs would be implemented to suppress dust arising from these activities (such as the use of water application). In addition, asbestos-containing waste, scrap, debris, bags, containers, equipment, and contaminated clothing consigned for disposal will be collected and disposed of in sealed, labeled, impermeable bags/sheeting or other closed, labeled, impermeable containers. Implementation of these procedures should reduce the potential for asbestos-containing material to become airborne and result in human exposure to asbestos.

For these reasons, exposure of Site workers or the surrounding community to NOA is not considered to be a hazard, and the potential for impacts related to human exposure to NOA would be Less than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used:

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Parsons. 2009. *Final Remedial Investigation Report for the Former Monterey Manufactured Gas Plant, PG&E Substation Site, Monterey, California*. April.

United States Geological Survey (USGS). 2011. "Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California." Open File Report 2011-1188. Accessed online 2/21/20 at: https://pubs.usgs.gov/of/2011/1188/pdf/Plate.pdf

10. Hydrology and Water Quality

Project Activities Likely to Create an Impact on Hydrology or Water Quality:

Project activities that could potentially impact hydrology or water quality are construction activities that could result in releases of contaminated materials, introduce silt into surface waters, or alter ground surface topography such that surface water flow would be redirected. These activities include:

- Excavation/removal and stockpiling of contaminated soil, concrete, asphalt, and/or wood over an approximately 26,130-square-foot area of the Project Site.

- Dewatering of the excavation area, for soils below the water table. Groundwater extracted during dewatering would be containerized and either disposed of offsite or treated and discharged under permit to the City's sanitary sewer collection system, pending approval from Monterey One Water.
- Offsite transport and disposal/recycling of excavated soil, concrete, asphalt, wastewater, and/or wood to an appropriate facility based on waste characterization, and importation of clean soil.
- Backfill of all excavated areas to roughly match pre-excavation conditions.

Description of Baseline Environmental Conditions:
The Project Site is approximately 600 feet from the shoreline of Monterey Bay, within the Seaside Area subbasin of the Salinas Valley Groundwater Basin in the Salinas River Hydrologic Unit. The Salinas River drains an approximately 3,950-square-mile area and is the largest water system in Monterey County (ICF Jones & Stokes 2008). The Salinas River originates in San Luis Obispo County, flows northwestward into Monterey County, and empties into Monterey Bay.

Under pre-cleanup conditions, the Site is paved and/or covered with gravel. Surface water drainage at the Site is controlled primarily by an existing storm water system. Most rainwater runoff flows locally to a sump at the northern property boundary. Water from this sump and water in the street catch basins is conveyed to the storm water collection system. The storm water collection system funnels water in a northerly direction to Monterey Bay where there is a storm drain outlet under the municipal wharf (Parsons 2009). Precipitation also creates ponding, evaporates, or seeps underground through the asphalt.

No natural or man-made surface water bodies (lakes, creeks, streams, or rivers) are present within the Project Site. The closest surface water bodies to the Project Site are Monterey Bay, approximately 600 feet north of the Project Site; and Lake El Estero, approximately 1,000 feet east of the Project Site.

Agencies with primary regulatory jurisdiction over water quality and/or waste discharge requirements include the California State Water Resources Control Board (SWRCB)/San Francisco Bay Regional Water Quality Control Board (Regional Water Board), DTSC, USEPA, California Department of Public Health, and Monterey Peninsula Water Management District. Key water quality standards and waste discharge requirements applicable to the Project and the associated agencies that govern them are summarized below:

- Clean Water Act California Toxics Rule, Title 40 Code of Federal Regulations (CFR) Section 131.38
- Clean Water Act Water Quality Criteria, Title 33 United States Code (USC) Section 1314 Quality Criteria for Water, 1986 USEPA 44/5-86-001, May 1
- Regional Water Board, Water Quality Control Plan for the Central Coast Basin, Water quality objectives
- Clean Water Act (NPDES Industrial Storm Water Permit Program), 40 CFR 122.26
- Clean Water Act (NPDES Construction Storm Water Permit Program), 40 CFR 122.26
- SWRCB and Regional Water Board, California Porter Cologne Water Quality Act (Design, construction, monitoring, and closure requirements for classified waste management units), Calif. Water Code Section 13020 et seq. Title 23, CCR, Division 3, Chapter 15, (Section 2510 et seq.)
- SWRCB and Regional Water Board, California Porter Cologne Water Quality Act (State Water Resources Control Board "Anti-degradation Policy"), Resolution No. 68-16
- SWRCB and Regional Water Board, California Porter Cologne Water Quality Act (State Water Resources Control Board Policy on Investigation and Remediation of Contaminated Sites), Resolution No. 92-49
- Regional Water Board, California Porter Cologne Water Quality Act (Central Coast Regional Water Quality Control Board Basin Plan), Water Quality Control Plan for the Central Coast Basin (2019 update)
- SWRCB and Regional Water Board, General Permit for Storm Water Discharges from Construction Activities, 40 CFR Parts 122, 123, 124, NPDES, implemented by SWRCB Order No. 99-08 DWQ
- SWRCB and Regional Water Board, General Permit for Storm Water Discharges from Industrial Activities, 40 CFR Parts 122, 123, 124, NPDES, implemented by SWRCB Order No. 97-03 DWQ
- CDFG, California Fish and Game Code (Discharge of Pollutants to Waters of the State), Calif. Fish and Game Code Section 5650

- OES CUPA, California H&SC (Hazardous Materials Release Response Plans and Inventory), H&SC Division 20, Chapter 6.95 19 (CCR Division 2, Chapter 4, Article 4)

The Monterey Bay is 600 feet north of the Project Site. Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) indicate that the Project Site lies within a FEMA 500-year flood zone (0.2 percent annual chance flood hazard), but outside of a 100-year flood zone (FEMA 2020). No dams or levees are present in the Project vicinity and the Project Site is not located in any dam inundation areas (Monterey County 2010a). The closest dam inundation area is associated with Forest Lake, approximately 3 miles to the southwest of the Project Site. Given its proximity to Monterey Bay, there is a possibility of flooding at the Project Site due to tsunamis. As determined by the CGS and California Emergency Management Agency (CEMA), the Project Site is within a tsunami inundation area (CGS and CEMA 2009). Seiches (large standing waves) occur in large inland bodies of water and can be triggered by meteorological disturbances, seismic activity, or tsunamis. The closest inland water body is Lake El Estero, 1,000 feet east of the Project Site. As discussed in the Geology and Soils section, there is no history of landslides and no known earthquake or rainfall-induced landslide hazard zones have been identified at the Project Site (CGS 2020).

Depth to groundwater beneath the Project Site ranges from 6.5 to 8 feet bgs and fluctuates up to 1 foot with the tides (ERM 2020a). Groundwater is present within heterogeneous, generally high permeability materials consisting of sand with coarse to fine gravel. Several 1- to 2-foot-thick layers of silt with clay (ETIC 2020), and at least one 6-inch-thick layer of clay (Parsons 2009) were encountered within 6 feet of the ground surface, indicating that less-permeable layers are present in the shallow subsurface. Groundwater beneath the Site flows north toward Monterey Bay with an average gradient of approximately 0.004 foot per foot (ERM 2020a).

Groundwater at the Project Site is not known to have ever been used for domestic, agricultural, or industrial water supply. Section 2.1 of the Central Coast Regional Water Quality Control Board, Central Coast Region (CCRWQCB) Water Quality Control Plan (Basin Plan) cites beneficial uses of groundwater throughout most of the Central Coast Basin (including the Seaside Area subbasin) as agricultural water supply, municipal and domestic water supply, and industrial use (CCRWQCB 2019). The City of Monterey obtains water from surface water and wells in the Carmel Valley alluvial aquifer and the Seaside coastal groundwater subbasin (EMC Planning Group, Inc. 2004b).

Analysis as to whether or not project activities would:

a. Violate any water quality standards or waste discharge requirements.

Impact Analysis:
Increased erosion and contaminated runoff as a result of Project activities could potentially impact water quality in the Project area. Construction vehicles and equipment could accidentally release fuels, lubricants, oils, or other maintenance materials onto the ground during Project activities. These materials could enter the storm drain system or migrate in surface water overflow, which would degrade the water quality of nearby surface water features. Excavated materials that are temporarily exposed during excavation activities or stockpiled could be entrained in surface water runoff if a significant rain event occurred during construction.

No natural or man-made surface water bodies (lakes, creeks, streams, or rivers) are present within the Project Site. The closest surface water bodies to the Project Site are Monterey Bay, approximately 600 feet north; and Lake El Estero, approximately 1,000 feet east. BMPs would be applied during the removal actions, stockpiling, and backfill operations in accordance with a Project-specific Waste Management Plan and Erosion and Sediment Control Plan developed by the Contractor to reduce the possibility of violating applicable water quality standards (as described in the section above) and waste discharge requirements. Standard BMPs anticipated to be employed include:

- Use of silt fences, sandbag berms, hay bales, and grading to eliminate/reduce the movement of silt or sediment from the excavation area into storm water runoff
- Management of stockpiles generated during cleanup work to prevent the movement of silt into storm water runoff through: diversion of drainage from the stockpile areas; placement of sandbags and silt fencing; and sloping of stockpiles to encourage sheet flow
- Management of solid wastes (such as concrete, asphalt, and wood) from cleanup activities in accordance with the Project-specific Waste Management Plan to prevent contamination of storm water runoff
- Use of spill control measures and standard procedures for hazardous materials storage and vehicle fueling in accordance with a Project-specific Spill Prevention and Response Plan to be prepared and implemented by the Contractor to manage hazardous wastes and materials to reduce the potential for spills and offsite discharge via storm water

These and other BMPs, as necessary, would be implemented and inspected regularly to maintain storm water quality at the Site. If new hazards are introduced to the Site, the BMPs would be reviewed and updated; therefore, it is anticipated that no water quality standards or waste discharge requirements would be violated. Furthermore, other than the application of clean water as dust suppression during active remediation, for which there should be limited to no runoff, no other surface water discharges are anticipated. As such, Project impacts related to water quality standards or waste discharge requirements would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).*

Impact Analysis:
Remediation activities involve removal of impacted solid media from shallow soil intervals. The only activity associated with remediation activities that could result in extraction of groundwater would be excavation dewatering, if needed. Soil to be excavated beneath the water table (present at approximately 6.5 feet bgs) would require construction dewatering. Dewatering activities would involve temporarily extracting groundwater from the excavation site. Dewatering would be performed in accordance with a Dewatering Plan prepared by the Contractor; this plan would be designed to remove only the amount of groundwater necessary to clear the Site of standing water during excavation (by approximately 1 foot). The Project Team estimates that this volume would be approximately 100,000 gallons over the excavation period. This volume of water would not substantially deplete groundwater supplies. In addition, given the limited required lowering of the groundwater table level, dewatering would result in only localized effects on the water table within or immediately adjacent to the dewatering site.

The Project Site is currently paved and/or covered with gravel, which does not allow for significant recharge from rainfall; after completion of cleanup activities the excavation area would be unpaved with backfill materials present at the ground surface until PG&E transitions the Site back to use as an upgraded substation. Therefore, the Project would not decrease the amount of recharge to the Project Site through percolation of surface water. For these reasons, the Project would not create a net deficit in aquifer volume or cause the water table to drop, and the impact would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.*

Impact Analysis:
No streams or rivers are present in the Project vicinity. Surface drainage within the Site consists of rainfall or other surface water runoff, which is directed to the City of Monterey storm water collection system. Proposed excavation activities would affect local Site topography/drainage patterns while the excavation remains open. However, the excavation area would remain open for a relatively short term, and excavation activities are planned for a time of the year when rainfall is unlikely. Furthermore, following excavation activities, the Site would be backfilled to roughly match the pre-existing grade and the drainage system (inlet and ditch) would be restored to match pre-excavation conditions; therefore, the existing drainage pattern in the area (surface runoff to the storm water system) would not be significantly altered. BMPs would be employed during cleanup activities to reduce the potential for migration of sediments from the work area. In addition, the topography around the Project Site is relatively flat and the excavation area would also be relatively flat following completion of cleanup activities; therefore, post-cleanup conditions would not result in substantial erosion or siltation. In consideration of the above, Project-related impacts to erosion or siltation due to altered Site drainage patterns would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.*

Impact Analysis:
No streams or rivers are present in the Project vicinity. Surface drainage within the Site consists of rainfall or other surface water runoff, which is directed to the City of Monterey storm water collection system. Proposed excavation activities would affect local Site topography/drainage patterns while the excavation remains open. However, the excavation area would remain open for a relatively short term. BMPs installed to prevent siltation migration to sewers and waterways could affect surface drainage patterns, but these BMPs would be removed after completion of cleanup activities. Cleanup activities are planned for a time of the year when rainfall is unlikely; thus, flooding due to Project activities is also unlikely. Furthermore, following excavation activities, Site restoration would be completed, and the Site would be backfilled to roughly match the pre-existing grade and the drainage system (inlet and ditch) would be restored to match pre-excavation conditions. No impervious surfaces would be installed as part of the Project. Therefore, the existing drainage pattern in the area (surface runoff to the storm water system) would not be altered. In consideration of the above, Project-related impacts to flooding due to altered Site drainage patterns would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. *Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.*

Impact Analysis:
A limited amount of runoff water could be generated during Project activities as part of equipment or vehicle rinsing/washing, or applying water for dust suppression (estimated at approximately 8,000 gallons per day). As described above, BMPs would be employed to reduce or eliminate the amount of runoff associated with these activities. As is standard practice, to the extent practical, rinse water would be captured using standard BMPs and containerized. Dust suppression would be controlled such that the targeted soils would be moistened, but not soaked, with water applied for that purpose; the majority of this volume would soak into and remain in the soil. As noted above, dewatering would be required for soil excavated beneath the water table (present at approximately 6.5 feet bgs); an accidental release of this groundwater could contribute runoff water.

As noted above in Item a, cleanup activities would employ BMPs to eliminate/reduce the movement of silt or sediment from excavation areas and manage stockpiles generated during construction to prevent the movement of silt from those stockpiles. Construction activities would comply with Monterey County permit requirements and other local, state, and federal water quality requirements related to the above issues.

Rinse water and groundwater extracted during dewatering (up to approximately 100,000 gallons) would be containerized in a storage tank within secondary containment, and either disposed of offsite or treated and discharged under permit to the City's sanitary sewer collection system, pending approval from Monterey One Water. The containerized rinse water and extracted groundwater would be sampled and analyzed to confirm that the disposal approach is compliant with permit conditions and applicable regulations.

The volume of runoff expected from remediation activities would be limited as noted above. Discharge to the storm sewer system would be controlled so as not to exceed the capacity of the storm sewers, which are designed for high flow volume storm conditions. Wastewater disposed of offsite would be transported to a disposal facility that: 1) is licensed to accept the waste; and 2) could accommodate the volume of wastewater generated.

In summary, the following practices reduce the potential Project-related impacts: 1) the use of water during remediation activities would be limited; 2) standard practices would be employed to reduce generation of runoff;

and 3) BMPs would be put in place to reduce the volume of runoff and the potential for migration of impacted sediments into runoff. Therefore, capacity of the storm water drainage system would not likely be exceeded as a result of Project activities, and the Project would not result in substantial additional sources of polluted runoff. Therefore, the Project-related impacts would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

f. Otherwise substantially degrade water quality.

Impact Analysis:
Project activities are being proposed to address potential sources of contamination in soils, the removal of which would ultimately have the potential to improve groundwater quality. Excavation and contaminated media removal activities are not expected to substantially degrade surface or groundwater quality because BMPs would be employed to reduce the volume of runoff and the potential for impacted sediments to migrate into surface water, and waste handling and spill prevention procedures would be conducted in accordance with local, state, and federal regulations developed for protection of the environment, including water quality. Therefore, the Project-related impacts would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance rate Map, or other flood hazard delineation map.

Impact Analysis:
The Project Site is not within a 100-year flood hazard area, and the Project does not include the construction of housing. Therefore, there would be No Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Impact Analysis:
The Project Site is not within a 100-year flood hazard area, and the Project does not include the construction of any aboveground structures. Heavy equipment, such as a paver, excavator, drill rig, backhoe, bulldozer, jack hammer, or grader, would be at the Site during Project implementation, but only temporarily. This equipment would not significantly impede or redirect flood flows. Therefore, there would be No Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact Analysis:
The Project Site is not within a 100-year flood hazard area or a dam inundation area, and the Project does not include construction of levees or dams. The closest dam inundation area to the Project Site is associated with Forest Lake, approximately 3 miles to the southwest, and floodwaters associated with failure of this dam would

flow north and west toward the Pacific Ocean. Therefore, there would be No Impact related to flooding as a result of levee or dam failure.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

j. Inundation by seiche, tsunami, or mudflow.

Impact Analysis:
Given its proximity to Monterey Bay, there is a possibility of flooding at the Project Site due to tsunamis, and the Project Site is within an identified tsunami inundation area. However, Project activities would not increase the potential for or risks associated with a tsunami. The closest inland water body is Lake El Estero, 1,000 feet east of the Project Site. Due to the distance between the Project Site and Lake El Estero, it is unlikely that the Project Site would be impacted by a seiche. As discussed in the Geology and Soils section, there is no history of landslides and no known earthquake or rainfall-induced landslide hazard zones have been identified at the Project Site. Given the flat topography of the Project Site and vicinity, there is no anticipated risk related to inundation by mudflow. Therefore, the Project-related impacts related to seiche, tsunami, or mudflow inundation would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used:

Central Coast Regional Water Quality Control Board (CCRWQCB). 2019. Water Quality Control Plan for the Central Coast Basin. June 2019. Accessed online 02/24/20 at: https://www.waterboards.ca.gov/centralcoast/publications_forms/publications/basin_plan/docs/2019_basin_plan_r3_complete.pdf

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11. Land Use and Planning

Project Activities with Potential to Create an Impact on Land Use and Planning: None

Description of Baseline Environmental Conditions/Explanation for No Impact Finding:

The Project Site has been used for industrial purposes for over 100 years. In the early 1900s, an MGP was on and adjacent to the Project Site (ETIC 2020). In 1934, PG&E converted the Project Site into a service center and electrical substation (Parsons 2011), which has been active until 2020. Upon completion of the proposed remediation activities, PG&E plans to install upgraded electrical equipment and return the Project Site to use as an electrical substation (ERM 2020a), resulting in no net change in land use at the Project Site. As part of the Project, a land use covenant would be recorded to restrict future land uses to industrial/commercial, consistent with the property's past and proposed future use as an electrical substation.

The City of Monterey General Plan, Land Use Plan Map classifies the Project Site as a "Public/Semi-Public" area which is defined as "…*publicly owned facilities and those private facilities operated to serve the general public*…" (City of Monterey 2019a). There are no goals or policies in the City of Monterey General Plan that provide specific guidelines for electric utilities within the City. The Land Use Element of the City of Monterey General Plan has one goal and subsequent policy that generally apply to the Project Site:

- **Goal a.** Maintain a Land Use Plan Map to guide future development and land use.
    - **Policy a.1.** Implement the Land Use Plan using the Land Use Plan Map and the following land use categories:
        - Public/Semi-Public. This category applies to all publicly owned facilities and those private facilities operated to serve the general public except for parks and recreation facilities, which are a separate category. Included in this category are: public schools, military facilities, the airport, cemetery, large public parking facilities, hospitals, museums, conference center, and some publicly-owned historic buildings.

Project activities would not conflict with the applicable City of Monterey goal and policy because no land use changes are proposed as a result of Project implementation. The proposed cleanup actions would be consistent with the current and planned use of the Project Site as "Public/Semi-Public." Consequently, there would be No Impact from the Project, and no further analysis of impacts is deemed necessary.

Analysis as to whether or not project activities would:

a. *Physically divide an established community?*

Impact Analysis:
Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. *Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.*

Impact Analysis:
Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact Analysis:
Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

City of Monterey. 2019a. *City of Monterey General Plan*. Adopted 2005, last amended June 2019. Accessed on 4/2/2020. https://monterey.org/Portals/0/Reports/CommDev/19_0604%20General%20Plan.pdf

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12. Mineral Resources

Project Activities Likely to Create an Impact on Mineral Resources: None

Description of Baseline Environmental Conditions/Explanation for No Impact Finding:
The primary mineral resources currently mined in Monterey County are sand, gravel, and petroleum (Monterey County 2008). The following historical mineral resource production has occurred within the county: sand and gravel mining for construction materials; mining for industrial materials (diatomite, clay, quartz, and dimension stone); and metallic minerals (chromite, placer gold, manganese, mercury, platinum, and silver) (Monterey County 2008). The California Department of Conservation, Division of Mines and Geology mapped the Project Site as being within Mineral Resource Zone 2, which includes areas where there is adequate information that indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence (Kohler-Antablin 1999). There are no commercial mineral resources of economic value classified under the Surface Mining and Geology Act within City boundaries (City of Monterey 2019c).

For approximately 86 years prior to the planned cleanup activities, the Project Site contained structures associated with an electrical substation (ERM 2020a). Prior to that time, an MGP plant was on the Project Site and immediate vicinity. In 2021, PG&E will temporarily de-energize the electrical substation and remove the above-grade equipment to prepare for installation of an upgraded electrical substation. The cleanup actions would be performed while the substation is inactive, and the Project Site is vacant. In the unlikely event that mineral resources are present at the Project Site, access to those resources would be unchanged as a result of the Project. Furthermore, the proposed cleanup activities would have temporary effects restricted to the immediate Project Site and would not affect recovery of mineral resources at other locations outside the Project Site. Therefore, the Project would result in No Impact to the availability of known mineral resources or mineral resource recovery sites, and no further analysis of mineral resources is necessary.

Analysis as to whether or not project activities would:

a. *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.*

Impact Analysis:
Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.*

Impact Analysis:
Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

City of Monterey. 2019c. City of Monterey General Plan. Conservation Element. Accessed online at: https://monterey.org/Portals/0/Reports/CommDev/19_0604%20General%20Plan.pdf

ERM. 2020a. *Soil Remediation Feasibility Study and Remedial Action Plan, Former Monterey-1 Manufactured Gas Plant Electrical Substation, 498 Del Monte Avenue, Monterey, California.* 18 December.

Kohler-Antablin, Susan. 1999. *Generalized Mineral Classification Map of the Monterey Bay Production Consumption Regions South Half*. California Department of Conservation Division of Mines and Geology. Accessed online 02/20/20 at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_99-01/OFR_99-01_Plate-2.pdf

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13. Noise

Project Activities Likely to Create Noise Impacts:

Project activities that are likely to increase noise levels are construction activities involving the use of heavy equipment, including:

- Sampling and geotechnical testing using drill rigs
- Construction of driveways to facilitate ingress/egress
- Excavation/removal of contaminated soil, concrete, asphalt, and/or wood using appropriate construction equipment from the excavation area (expected to include excavator, loader, skid steer, concrete breaker, bulldozer, and water truck); loading the contaminated media directly onto transport trucks or placement into temporary stockpiles until excavated materials can be removed from the Project Site
- If dewatering is needed during the excavation phase, operation of pumps to accomplish that dewatering and transfer the extracted water into storage tanks
- Offsite transportation and disposal/recycling of excavated soil, concrete, asphalt, wood, and/or wastewater to appropriate facilities based on waste characterization, and importation of clean soil
- Site restoration including backfill of the excavated area and replacement of monitoring wells

Description of Baseline Environmental Conditions:
The existing primary noise sources near the Project Site include vehicular traffic, and activities and events at the adjacent Monterey Sports Center, the nearby baseball field, and recreational areas. The Project Site is zoned for

public/semi-public use, and is surrounded by public streets on the north, east, and south sides, and by the Monterey Sports Center to the west. Land use zoning for nearby sites varies. The Monterey Sports Center site to the west is zoned for public/semi-public use, while to the north and south are parks and open spaces. Other nearby sites are zoned for commercial use. The City of Monterey General Plan noise contours show that baseline noise levels at the Site and along the adjacent Figueroa Street range from 60 dB along E. Franklin Street to 70 dB along Del Monte Avenue (City of Monterey, 2019e).

The distances to the nearest sensitive receptors are as follows:

- Public Park: Jacks Park includes a baseball field. The baseball field is approximately 175 feet south of the Project Site boundary.
- Child care: The Monterey Sports Center offers short-term babysitting at an indoor location (up to 2 hours per visit, and up to two visits per child per day) as a service for parents visiting the Sports Center. The child care area is approximately 300 feet west of the Project Site boundary.
- School: 1,250 feet southeast of the boundary of the Project Site (San Carlos School at 450 Church Street)
- Residential housing: 2,000 feet west of the Project Site boundary, along Van Buren Street. The area is zoned for medium density housing (City of Monterey 2019e).

The Site is at a distance of approximately 1.7 miles to the west of the Monterey Regional Airport, and therefore lies within the Airport Influence Area defined in the Monterey Regional Airport Land Use Compatibility Plan (Monterey County Airport Land Use Commission, 2019).

In response to the requirements of the federal Noise Control Act of 1974, the USEPA identified indoor and outdoor noise limits to protect public health and welfare (e.g., prevent hearing damage, sleep disturbance, and communication disruption). Day-night average outdoor sound values of 55 dBA, and indoor sound values of 45 dBA are identified as desirable to protect against speech interference and sleep disturbance for residential, educational, and health-care areas (USEPA1974).

While these noise thresholds have been identified by the USEPA, the state and local governments generally have responsibility for regulating noise, and have established noise-related regulations and standards. Typically, noise regulations correspond with zoning ordinances for a locality. This can include not only residential areas but also office, light industrial, and heavy use/manufacturing activities.

The federal OSHA and the Division of Occupational Safety and Health of the State of California Department of Industrial Relations (known as Cal/OSHA) both specify regulations for permissible noise exposures for employees, dependent on the duration per day of noise exposure. For example, over an 8-hour workday, the allowable sound level is 90 dBA, but for 4 hours, the allowable sound level is 95 dBA. If noise levels exceed these allowable thresholds, both OSHA and Cal/OSHA regulations (Title 8 Subchapter 7, Group 15, Article 105 Section 5097) require a hearing conservation program to reduce noise levels experienced by a worker (OSHA 2008).

As required by state law, the City of Monterey General Plan uses defined noise levels to establish the City's land use compatibility standards for noise (City of Monterey 2019). The Plan specifies that Community Noise Equivalent Levels (CNELs) for sites zoned as utilities should not exceed 75 dBA day-night average sound level (CNEL); exterior noise levels up to 80 dBA may be conditionally acceptable. Normally acceptable noise levels for residential areas range from 60 dB CNEL for low-density housing to 65 dB for multi-family housing. For land use involving water recreation, noise levels up to 75 dB CNEL are normally acceptable. With regard to new developments, the City General Plan establishes a goal to allow new construction only where existing or projected noise levels are acceptable or can be mitigated, by requiring noise mitigation to reduce interior noise to acceptable levels, and by limiting the hours of noise-generating construction activities.

The Monterey City Code specifies noise performance standards and limitations on construction hours. The noise performance standards specify the maximum noise level allowed by zoning district at the property receiving noise. The maximum noise level allowed is 60 dB in residential, open space, and public/semipublic districts; 65 dB in commercial districts; and 70 dB in industrial districts (City of Monterey 2020). Hours of construction are generally limited to 7 a.m. to 7 p.m., Monday to Friday; 8 a.m. to 6 p.m. on Saturday; and 10 a.m. to 5 p.m. on Sunday; although the Zoning Administrator may permit an exception for a limited duration, subject to renewal after 3 months.

The County of Monterey Noise Control Ordinance included in Chapter 10.60 of the County's Code of Ordinances. establishes a maximum noise level standard of 85 decibels on the A-weighted scale (dB[A]) at 50 feet for non-transportation noise sources.

The FTA Transit Noise and Vibration Impact Assessment (FTA 2006) specifies an acceptable vibration threshold of 72 VdB (vibration decibels) for residential areas. However, the City of Vallejo Municipal Code states that "No use, activity, or process shall produce vibrations that are perceptible without instruments by a reasonable person at the property lines of a site" (Section 38-111.B of the Monterey City Code). Table 7-1 of the FTA manual states that the approximate threshold of perception for many humans is 65 VdB.

Analysis as to whether or not project activities would result in:

a. *Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.*

Impact Analysis:
The proposed Project would involve excavation and backfill-related construction activities for a period of 5 months. The primary sources of noise during construction at the Site would be from the operation of equipment such as an excavator, loader, skid steer, concrete breaker, and bulldozer. Sound attenuates rapidly with distance from the source. Table 13-1 below summarizes the sound levels expected to be associated with these sources, at distances of 50 and 300 feet. The nearest area where children (sensitive receptors) would routinely be present (at 300 feet) is within the Monterey Sports Center, for which the General Plan land use category of water recreation is presumed to apply. As seen in Table 13-1, sound levels at 300 feet would not exceed the 75 dBA threshold established in the City of Monterey General Plan.

Table 13-1. Typical Sound Levels for Heavy Construction Equipment

Equipment	Percentage of Time Utilized (%)	Sound Level at 50 feet (dBA)*	Sound Level at 300 feet (dBA)***
Excavator**	80	79	62
Loader	60	80	62
Skid steer	50	85	66
Concrete breaker	5	92	63
Bulldozer	50	85	66
Compactor	80	82	65
Water truck	100	88	72
Diesel generator	100	81	65
Drill rig****	20	85	62
Concrete mixer truck****	40	85	65

* From: Federal Transit Administration Transit Noise and Vibration Impact Assessment (2006) unless otherwise indicated

** From: UK DEFRA Database (2006)

*** Calculated using the following formula: Sound Pressure Level at 300 feet = Sound Pressure Level at 50 feet + 20 log (50/300)

**** From: Federal Highway Administration Construction Noise Handbook (2006)

Furthermore, sound from construction equipment would be further attenuated by conditions at the Project Site; specifically:

- Walls within the Project Site: Sound would be attenuated by walls surrounding the excavation area. Thirty-foot walls are situated along the southern portion of Figueroa, southern portion of the western property boundary, and along the southern perimeter of the Site. In addition, the approximately 10- to 15-foot block wall along Del Monte Avenue and a portion of Figueroa Street would reduce noise levels on the streets from Project activities.
- The level of noise that is perceptible at the Sports Center babysitting facility would be attenuated by the building walls situated between the work area and the babysitting area.

Project work would not occur during restricted hours between 7:00 p.m. and 7:00 a.m. For onsite cleanup workers, hearing protection would be used, consistent with the Site-specific HASP, to reduce the potential that appropriate noise criteria would be exceeded while working at the Project Site. Workers would wear earplugs while working on and around heavy equipment. If necessary, engineering controls could be implemented, including replacing defective equipment parts, tightening loose or vibrating equipment parts, and placing "noisy" equipment as far away as possible from Site workers and sensitive receptors. Should engineering controls be infeasible, administrative controls would be implemented, including adjusting employee work assignments to limit their noise exposure. With appropriate hearing protection, operation of the equipment is not expected to result in noise exposure to employees exceeding the OSHA level of 90 dBA (8-hour time weighted average).

As discussed previously, the County of Monterey Noise Control Ordinance and City of Monterey General Plan and Monterey City Code specify policies and standards related to exposure to offsite noise sensitive receptors such as residences. However, the quantitative exposure thresholds specified in the General Plan and City code are generally not applicable to short-term construction activities. Regardless, selecting the more restrictive of the General Plan and Municipal Code standards, operation of construction-related equipment is to be prohibited between 7:00 p.m. and 7:00 a.m. The proposed Project would prohibit construction activities during this period of the day and thus would be consistent with both the General Plan and Municipal Code.

Based on the above considerations, Project-related noise impacts would be Less Than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels.

Impact Analysis:
Some equipment used during Project activities, such as the bulldozer and trucks, could contribute to groundborne vibration or noise levels. Table 13-2 below summarizes the vibration levels expected to be associated with these sources where data are available, at distances of 25 and 300 feet (distance to nearest sensitive receptor). Construction workers would wear appropriate hearing protection, and engineering controls would be used to reduce groundborne vibration or noise levels (USEPA 1971, 1980). Noise monitoring may be conducted, as needed, to confirm that workers are not exposed to hazardous noise levels.

Table 13-2. Typical Vibration Levels for Heavy Construction Equipment

Equipment	Vibration Level at 25 feet (VdB)*	Vibration Level at 300 feet (VdB)**	Distance from source at which vibration would reduce to 65 VdB *** (in feet)
Large bulldozer	87	55	135
Loaded truck	86	45	125

* From: Federal Transit Administration Transit Noise and Vibration Impact Assessment (2006)

** Calculated using the following formula: Vibration Level at 300 feet = Vibration Level at 25 feet + 30 log (25/300)

*** Calculated using the following formula: $x \text{ (feet)} = 10^{[\log_{10}(25) - (65 - \text{Vibration Level at 25 VdB})/30]}$
where x is the distance at which the vibration level attenuates to 65 VdB

Vibration levels expressed as root mean square (RMS) velocity in decibels (VdB)

Given the type of equipment to be used and the distances to sensitive receptors, the nearest offsite noise sensitive receptors are not expected to be exposed to excessive groundborne vibration or groundborne noise levels. As shown in Table 13-2, vibration levels are not expected to reach 65 VdB within 300 feet of the source; therefore, vibration would be imperceptible.

Table 13-2 also shows the distance from each type of equipment at which vibration would be imperceptible. In order to remain in compliance with the Monterey City Code, vibration should not be perceptible at the property line. The exact locations of equipment use will depend on the requirements of the remediation program. As seen in Table 13-2, the use of vibration-causing equipment will cause perceptible vibration at the property line. However, any such activities will be intermittent and short term.

Work zone delineation would be set to protect the public from heavy construction equipment, as discussed in Section 8 (Hazards and Hazardous Materials). This delineation will also reduce the potential for passers-by to be exposed to vibration associated with this equipment.

In summary, cleanup activities associated with the Project are unlikely to expose sensitive receptors to excessive groundborne vibration or groundborne noise levels for the following reasons:

- At the nearest residences and sensitive receptors to the work areas, vibrations associated with construction equipment would be imperceptible
- Work zone delineation will reduce the potential for passers-by to be exposed to vibration associated with construction equipment use
- Vibration-causing remediation activities would be intermittent and short-term

Therefore, the potential for the Project to result to expose sensitive receptors to excessive groundborne vibration or groundborne noise levels would be Less Than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. *A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.*

Impact Analysis:
The Project activities would be short term in nature (approximately 5 months in duration). The Project does not include the permanent installation of any noise-generating equipment, and once construction is complete, noise levels would return to pre-Project levels. Therefore, no permanent increase in ambient noise levels is expected, and there would be No Impact.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.*

Impact Analysis:
Project activities would cause a temporary increase in noise levels in the vicinity of the Project Site. However, the distances to the nearest sensitive receptors are great enough (at least 175 feet) that additional mitigation to protect the sensitive receptors from noise caused by the site work is not necessary. Baseline noise levels in the areas around the Project Site are already subject to traffic noise. The proposed activity would not result in a significant change in noise levels. Short-term construction activities would be performed consistent with the noise elements specified in the General Plan and the City Code. For example, construction activities would be prohibited between the hours of 7:00 p.m. and 7:00 a.m. Thus, the potential for the Project to result in a substantial temporary or periodic increase in ambient noise levels is Less Than Significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

Impact Analysis:
The Project is at a distance of approximately 1.7 miles from the property line of the Monterey Regional Airport, and is within the Airport Influence Area defined in the Monterey Regional Airport Land Use Compatibility Plan

(Monterey County Airport Land Use Commission, 2019). The Land Use Compatibility Plan identifies utilities as being a compatible land use within the noise contours for CNEL 65 and above. The Project Site is approximately 1.8 miles from the nearest portion of the existing and 20-year forecast CNEL 65 contours. The proposed Project therefore will not increase noise exposure of residents or workers who are exposed to noise from the Monterey Regional Airport.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. *For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels*?

Impact Analysis:
The Project is not within the vicinity of a private airstrip. Therefore, there would be No Impact.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

City of Monterey. 2019e. *City of Monterey General Plan.* Noise Element. Adopted 2005, last amended June 2019. Accessed March 2020 at: https://monterey.org/Portals/0/Reports/CommDev/19_0604%20General%20Plan.pdf

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Federal Transit Administration (FTA). May 2006. *Transit Noise and Vibration Impact Assessment*. Accessed online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf

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USEPA. 1974. *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety.* Accessed online at: https://nepis.epa.gov/Exe/ZyPDF.cgi/2000L3LN.PDF?Dockey=2000L3LN.PDF

USEPA. 1980. *Construction Noise Control Technology Initiatives.* Office of Noise Abatement and Control.

14. Population and Housing

Project Activities Likely to Create an Impact on Population and Housing: None

Description of Baseline Environmental Conditions/ Explanation for No Impact Finding:

For approximately 86 years prior to the proposed remediation activities, the Project Site has been used as an electrical substation, which currently operates remotely and is unstaffed (ERM 2020a). There is no housing within the Project Site; the current residential population is zero. PG&E plans to install new electrical equipment at the Project Site after remediation activities are completed, and to reinstitute its use as an electrical substation; there would be no housing within the Project Site with that use.

The Project involves temporary construction activities (ERM 2020a), and does not propose any new businesses, or new infrastructure that could result in substantial population growth. Replacement housing would not be needed as a result of the Project because the Site does not contain any housing from which residents could be displaced. The electrical equipment at the substation would be deactivated and removed before the proposed Project activities begin, and electrical needs in the service area would be met with temporary equipment located elsewhere within the service area; as such PG&E workers servicing the substation equipment would not be displaced. Project activities would be performed by a small temporary labor pool (approximately 18 fulltime site workers), and would not induce growth in the Project vicinity, nor would the Project affect existing housing or necessitate any construction of new or replacement housing in the Project vicinity.

For these reasons, the Project would have No Impact on population and housing, and no further analysis of population and housing impacts is deemed necessary.

Analysis as to whether or not project activities would:

a. *Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).*

   Impact Analysis:
   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

b. *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.*

   Impact Analysis:
   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

c. *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.*

   Impact Analysis:
   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

References Used:

ERM. 2020a. *Soil Remediation Feasibility Study and Remedial Action Plan, Former Monterey-1 Manufactured Gas Plant Electrical Substation, 498 Del Monte Avenue, Monterey, California.* 18 December.

15. Public Services

Project Activities Likely to Create an Impact on Public Services:

Project activities could potentially impact public services by increasing the number of workers and equipment present onsite. These activities could increase the need for law enforcement to: 1) protect these additional workers, 2) respond to accident situations, or 3) avoid or respond to willful damage or theft of construction supplies or equipment. Project-related activities could also increase the demand for fire protection. These activities include the following:

- Sampling and geotechnical testing using drill rigs, to be performed in advance of excavation work to characterize the extent of soils requiring excavation, and determine appropriate backfill requirements
- Construction of driveways to facilitate ingress/egress
- Excavation/removal of contaminated soil, concrete, asphalt, and/or wood using appropriate construction equipment from the excavation area (expected to include excavator, loader, skid steer, concrete breaker, bulldozer, and water truck); loading the contaminated media directly onto transport trucks; and/or stockpiling the excavated materials for temporary storage until they can be removed from the Project Site
- As needed, dewatering of the excavation during the excavation phase, temporary storage of extracted groundwater, treatment and discharge in accordance with permit requirements
- Offsite transportation and disposal/recycling of excavated soil, concrete, asphalt, wood, and/or wastewater to appropriate facilities based on waste characterization; and importation of clean soil
- Site restoration including backfill of the excavated area and replacement of monitoring wells

Description of Baseline Environmental Conditions:

The Monterey Police Department (MPD), the Monterey County Sheriff's Office, and the California Highway Patrol service the City of Monterey. However, the MPD has the primary responsibility for law enforcement within the City; its office is at 351 Madison Street in the City of Monterey (EMC Planning Group Inc. 2004b). The response time for MPD to deploy to the Project Site is dependent on time of day, street traffic, police or fire response activity, and other factors. According to online resources, it takes approximately 4 minutes to drive the 0.6 mile from MPD's office to the Project Site (Google Maps 2020).

The Monterey Fire Department (MFD) provides fire protection to the City of Monterey, Pacific Grove, and Carmel-by-the-Sea. The MFD has six stations total; the following three are within the boundaries of the City of Monterey (MFD 2020):

- Station 11: 600 Pacific Street
- Station 12:582 Hawthorne Street
- Station 13: 401 Dela Vina Avenue (MFD 2020)

The response time for MFD to the Site is dependent on time of day, street traffic, fire response or police activity, and other factors. The MFD Station nearest to the Project Site is Station 11; it takes approximately 4 minutes to drive the 0.7 mile to the Project Site (Google Maps 2020).

The Monterey Peninsula Unified School District (MPUSD) provides public education for kindergarten through twelfth grade and services the communities of Monterey, Seaside, Del Rey Oaks, Sand City, Fort Ord, Marina, and some unincorporated areas (EMC Planning Group Inc. 2004d). The MPUSD addresses the educational needs of Monterey residents with five public schools: two elementary schools (kindergarten through fifth grade), one charter school for kindergarten through eighth grade (Bayview Academy 2020), one middle school (sixth through eighth grade) and one high school (ninth through twelfth grade) (EMC Planning Group Inc. 2004a, Walter Colton Middle School 2020). MPUSD services approximately 10,000 students and employs approximately 1,250 employees (Monterey Peninsula Unified School District 2015-2016). Private schools are also within the boundaries of the City of Monterey.

The City of Monterey has 37 parks, four of which are in close proximity to the Site (City of Monterey 2020a, 2020b). The following parks are within 0.5 mile of the Project Site:

- El Estero Park Complex – This 45-acre special recreation area, centered around Lake El Estero, is on Del Monte Avenue and contains the Dennis the Menace Playground (EMC Planning Group Inc. 2004b). This park is approximately ½ mile from the Project Site at its closest point (Google Maps 2020).

- Jacks Park – This 3.7-acre special recreation area, containing a baseball/softball field and grand stands (EMC Planning Group Inc. 2004e, City of Monterey 2016b), is across E. Franklin Street immediately south of the Project Site on E. Franklin and Figueroa Street.
- Monterey Tennis Center (MTC) – This special recreation area, containing six lighted tennis courts and a pro shop, is at 401 Pearl Street and is immediately south of Jacks Ballpark (City of Monterey 2016e), approximately 0.2 mile from the Project Site (Google Map 2020). The MTC is open daily, weather permitting; it has a membership program, but is also open to the public (City of Monterey 2020).
- Monterey Bay Waterfront Park/Window on the Bay – This 9.3-acre community park is on Del Monte Avenue (EMC Planning Group Inc. 2004e), approximately 0.1-mile northeast of the Site (Google Maps 2020).
- Monterey Bay Coastal Recreational Trail – This special park is a 4.75-mile trail that is a portion of an 18-mile regional trail that runs along the Monterey Coast (City of Monterey 2016c). The trail is north of the Site and adjacent to Municipal Beach.
- Monterey Municipal Beach – This 0.75-acre special park is north of the Site past Del Monte Avenue along the coast (City of Monterey 2016d).

Health services are provided to Monterey residents at the Community Hospital of Monterey Peninsula (CHOMP), which is the only hospital on the peninsula (City of Monterey 2019f). The hospital is approximately 2.7 miles from the Project Site at 23625 Holman Highway (Montage Health 2020b), an approximate 8-minute drive (Google Maps 2020). CHOMP also provides a 24-hour emergency room (Montage Health 2020a). Ambulance service within the City of Monterey is typically provided by private ambulance services and may also be provided by MFD (County of Monterey 2020c)

An Urgent Care facility, MoGo Urgent Care, is scheduled to open in 2020 and will be at 2020 Del Monte Avenue (Montage Health 2020c), approximately 1.2 miles from the Project Site (Google Maps 2020).

Analysis as to whether or not project activities would:

a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

   i. *Fire protection*

   ii. *Police protection*

   iii. *Schools*

   iv. *Parks*

   v. *Other public facilities*

   Impact Analysis:
   Project activities would be short term (approximately 5 months) and would employ a relatively small temporary workforce (an estimated 18 fulltime site workers) from Bay area locations.

   Fire and police protection could be needed in the event of upset conditions, but would not represent a planned service demand for the Project. Project-related activities could increase the demand for fire protection if they resulted in accidental fires. However, the proposed activities would be conducted in accordance with the Site-specific HASP and Emergency Action Plan. Successful implementation of the Emergency Action Plan would minimize potential impacts related to fires. Further, the potential for fire hazards would be reduced through proper maintenance and operation of the machinery and vehicles, proper storage of fuels, and enforcement of safe work practices and other safety provisions as specified in the HASP. Cleanup activities could increase the need for law enforcement to: 1) protect cleanup workers, 2) respond to accident situations, or 3) avoid or respond to willful damage or theft of construction supplies or equipment.

   Given the short duration of the cleanup activities, Project workers would not be likely to relocate into homes in the City of Monterey, or to enroll their children in Monterey District schools unless they already lived in the district. This small number of Project workers would also not significantly impact park usage in the Project area.

   The Project involves cleanup activities, and would not create new structures or housing that would increase the number of people working in or residing at the Project Site. Accordingly, post-cleanup conditions would have the same demand for public services as under current conditions.

Based on the small number of cleanup workers and the short duration of the Project, there would not be a significant demand for public services during construction. Demand for public services after Project completion would be the same as under current conditions. Therefore, alteration to existing or new public facilities would not be required, and Project needs could be accommodated by the existing public services. Therefore, Project-related impacts would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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16. Recreation

Project Activities Likely to Create an Impact on Recreation Resources:

Project activities that could potentially impact recreational resources include the following construction activities, which would increase the number of workers at the Project Site, and could result in an increase in usage of recreational facilities:

- Sampling and geotechnical testing using drill rigs, to be performed in advance of excavation work to characterize the extent of soils requiring excavation, and determine appropriate backfill requirements
- Construction of driveways to facilitate ingress/egress
- Excavation/removal of contaminated soil, concrete, asphalt, and/or wood using appropriate construction equipment from the excavation area (expected to include excavator, loader, skid steer, concrete breaker, bulldozer, and water truck); loading the contaminated media directly onto transport trucks; and/or stockpiling the excavated materials for temporary storage until they can be removed from the Project Site
- As needed, dewatering of the excavation during the excavation phase, temporary storage of extracted groundwater; treatment and discharge in accordance with permit requirements
- Offsite transportation and disposal/recycling of excavated soil, concrete, asphalt, wood and/or wastewater to appropriate facilities based on waste characterization; and importation of clean soil
- Site restoration including backfill of the excavated area and replacement of monitoring wells

Description of Baseline Environmental Conditions:

The City of Monterey draws over 8 million visitors annually (City of Monterey 2016c). Located on the coast, the City of Monterey has many recreational opportunities outdoors such as scuba diving and kayaking, as well as trail and beach activities. Other recreation programs take advantage of the City's rich history with several museums, including the Presidio of Monterey Museum in Lower Presidio Historic Park (City of Monterey 2016c, 2020c). Currently the Parks Department oversees 256 acres of parks and 37 acres of beaches. The City of Monterey has prepared a Parks and Recreation Master Plan, which provides a general approach for recreational elements of the City's General Plan into 2030; this plan envisioned approximately 22.8 acres of parks and public open space per 1,000 residents (City of Monterey 2016d).

The City of Monterey offers over 300 programs, camps, and events run by the City Parks and Recreation Department (Monterey Recreation 2019). Along with 37 parks and athletic fields, the City of Monterey also contains several museums and a Sports Center (City of Monterey 2020a). The City of Monterey General Plan zones the Project Site as "Public / Semi-Public", and surrounding areas as "Commercial" or "Parks and Open Space" (City of Monterey 2010).

Recreational resources in the City of Monterey include a world-renowned aquarium that draws 1.8 million visitors annually (City of Monterey 2016c), multiple museums and historical locations, including the location where the first

California Constitution was written, and a 4.75-mile coastal trail that connects to an 18-mile regional trail along the Monterey Coast (City of Monterey 2016d). The following recreational facilities are within 0.5 mile of the Project Site:

- The Monterey Sports Center is a full-service sports facility at 301 East Franklin Street, directly west of the Project Site. This facility contains a gymnasium, two studios, two indoor pools, a sundeck, a cardio fitness center, and a weight training center (Monterey Sports Center 2020).
- The Monterey County Youth Museum (MY Museum), at 425 Washington Street, is a community-based museum for hands-on learning for children and has nine gallery areas and over 50 exhibits (MY Museum 2018).
- Fisherman's Wharf hosts a collection of restaurants, shops, and whale watching cruises (Old Fisherman's Wharf 2020).

As discussed in the Public Services section above, the City of Monterey maintains 37 parks for public use; categorized as neighborhood, pocket, community, open space, and special parks (City of Monterey 2016d). The following parks are within 0.5 mile of the Project Site:

- El Estero Park Complex, a 45-acre community park along Del Monte Avenue (City of Monterey 2016f, 2016g)
- Jacks Park, a 3.7-acre community park across E. Franklin Street, immediately south of the Project Site, on E. Franklin and Figueroa (City of Monterey 2016c, 2016d)
- Monterey Tennis Center, a six-court special park immediately south of Jack's Ball Park, on Pearl Street (City of Monterey 2016c, 2016d)
- Monterey Bay Waterfront Park Center, a 4.8-acre community park north of the Site, between Del Monte Avenue and the beach (City of Monterey 2016c, 2016d)
- Monterey Bay Coastal Recreational Trail, a special park, is a 4.75-mile trail that is a portion of an 18-mile regional trail that runs along the Monterey Coast (City of Monterey 2016d). The trail is north of the Site and adjacent to Municipal Beach and the Municipal Wharf.
- Monterey Municipal Beach is a 0.75-acre special park that is north of the Site past Del Monte Avenue, along the coast (City of Monterey 2016f).

Analysis as to whether or not project activities would:

a. *Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.*

   During cleanup activities, cleanup workers could make use of nearby parks or trails during breaks, but their use would be temporary, and the relatively small number of workers using these facilities would not place a significant demand on these resources. For these reasons, the Project-related impacts would be Less Than Significant.

   Impact Analysis:
   Conclusion:

   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☒ Less Than Significant Impact
   ☐ No Impact

b. *Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*

   The Project involves short-term cleanup activities, and would not create new structures or housing that would increase the number of people working in or residing in the vicinity of the Project Site. Therefore, there would be no Project-related demand for construction or expansion of recreational facilities. The Project does not include the construction or expansion of recreational facilities. Therefore, the Project would have No Impact on recreational resources.

Impact Analysis:
Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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17. Transportation and Traffic

Project Activities Likely to Create an Impact:
Project activities that could impact traffic around the Project Site are those that would increase vehicle traffic to and from the Site, including:

- Construction of a second access point (driveway) along Figueroa Street, pending approval from the City of Monterey.
- Expansion (widening) of the existing access gate along Figueroa Street, pending approval from the City of Monterey.
- Offsite transport and disposal/recycling of excavated soil, concrete, asphalt, wood, and wastewater to appropriate facilities (based on waste characterization), and importation of clean soil. These excavation activities would require up to approximately 1,400 round trips by haul trucks or vacuum trucks to transport materials offsite and import material onsite; this level of Project-related traffic would occur over the course of approximately 5 months.

- Emplacement of temporary traffic and engineering controls (i.e., fences, barricades, signs, caution marking, and/or, traffic control staff/flaggers) to protect the public from cleanup activities and equipment. Traffic controls may apply to vehicles, bicycles, and/or pedestrians. The traffic and engineering controls would be removed following cleanup activities, and no permanent alterations to pathways are anticipated.

Description of Baseline Environmental Conditions:

The Monterey County roadway system includes thousands of miles of highways, regional arterial roads, and collector and local streets. These roadways serve vehicle traffic for all trip lengths and trip purposes, ranging from regional (e.g. from San Francisco to Los Angeles on State Route 1[SR-1]) to local (e.g. Monterey to Seaside).

The Project Site is at the southwest corner of Del Monte Avenue and Figueroa Street. Regional traffic from the north or south arrives on SR-1, which is roughly 1 mile south, and 2 miles east of the Site. Traffic from the west travels along SR-68, which merges with SR-1, and SR-218 which exits on Del Monte Avenue. From SR-1, traffic to the Project Site vicinity travels along the following main roads: Fremont Street, Munras Avenue and Del Monte Avenue. Local roads in the immediate Project Site area are E. Franklin Street and Figueroa Street. Truck routes in the vicinity of the Project Site are shown on Figure 6.

Fixed-route transit service in Monterey is provided by Monterey-Salinas Transit (MST) and includes more than 60 fixed bus routes (MST 2018a). The fixed-route transit system accommodated approximately 4.64 million passenger trips in Fiscal Year 2018 (MST 2018b). The nearest fixed-route transit station to the Project Site is on Del Monte Avenue, approximately 0.25 mile from the Site. This station can be accessed via 10 local bus lines that connect with regional lines to Big Sur, Paso Robles, and Los Angeles to the south; San Jose and Santa Cruz to the north; Salinas to the east; and Pebble Beach to the west.

The rail network within Monterey County includes facilities for passenger or freight movement and is limited to one service provided by Amtrak. There are no Amtrak train stations near the Project Site. The nearest station is in Salinas.

Bikeways provide primarily for, and promote, bicycle travel. There are four types of bikeway classifications identified by the California Department of Transportation (Caltrans) (Caltrans 2017). These classes are as follows:

- Class I. Paths or trails, separated from roadways, for the exclusive use of bicycle and pedestrian modes of travel
- Class II. Designated lanes for bicycles on roadways
- Class III. Roads where bicycles and vehicles share the travel lanes of the roadway
- Class IV. Designated lanes for bicycles on roadways that are separated from the vehicular lanes by barricades, such as bollards, raised curbing, or parking lanes

Monterey County has 887 miles of bicycle pathways (AMBAG 2014). The major continuous pathway in the county is the Monterey Bay Coastal Recreation Trail, which extends from Castroville in the north, to the Monterey Peninsula and parts of Pebble Beach to the south. The Trail runs adjacent to the Fort Ord Dunes State Park, between the cities of Seaside and Marina. Most of the Trail sections are Class I bikeways, but short sections are Class II and Class III (TAMC 2008). Another notable bicycle pathway in Monterey is a protected bicycle lane adjacent to the medians of North Fremont Street. A bicycle lane is present along Figueroa Street adjacent to the Project Site.

In addition to bikeways, pedestrian sidewalks are provided along many roadways in Monterey near the Project Site. Pedestrian crosswalks are provided at major intersections. Pedestrian pathways occur along the streets that bound the Site (E. Franklin Street, Figueroa Street, and Del Monte Avenue). Due to the City's popularity and the Site's proximity to the shores of Monterey Bay, the pathways around the Project Site may experience substantial traffic.

Analysis as to whether or not project activities would:

a. *Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.*

   Impact Analysis:

   The Project work will result in an increase in vehicular traffic entering and exiting the Project Site, including trucks delivering equipment and materials, trucks transporting materials out of Monterey, and personnel and support vehicles. The Project Site is along designated truck routes, and therefore Project-related vehicles

would not drive on residential streets or on streets adjacent to schools, and would travel only on designated truck routes (Figure 6) already being used by commercial vehicles. Incoming trucks would drive westbound on Del Monte Avenue, turn left onto Figueroa Street, and then turn right onto the Project Site at the new driveway; outgoing trucks would exit the Project Site onto Figueroa Street from the existing driveway (Figure 5).

The cleanup actions expected to generate the largest number of truck trips will be the excavation and backfilling of the impacted soil. The cleanup would require approximately 710 round trips for export and approximately 690 total round trips for import for restoration over the course of up to 5 months. These export and import activities would occur over a short period of time (an estimated average 30 daily round trips and maximum 50 daily round trips on days when both import and export are occurring).

Caltrans-licensed transporters would transport the soil offsite in trucks. The Project would involve stockpiling and transporting the excavated/removed materials (including soil, wood, concrete, asphalt, and/or wastewater); however, the Project Site has ample support area such that no stockpiling would occur in public streets.

The addition of the second driveway would increase the efficiency of the Project-related traffic flow, and reduce the potential for blockage of the nearby streets. The use of traffic controls at the Site's access gates should further reduce impacts to traffic circulation patterns. The vehicles that would be used at the Project Site are compatible with the current street designs. Therefore, Project-related impacts to traffic circulation, including pedestrian and bicycle circulation, would be limited, involving short-term blockage 1) during the construction of the access gates and driveway, and 2) as trucks enter/exit the work area. Traffic controls would be implemented to reduce impacts to the use of designated bicycle paths or pedestrian routes. Any encroachment or closure of sidewalks, travel lanes and bike lanes will have a Temporary Traffic Control Plan submitted to the City of Monterey. The second driveway shall not have obstructions that prevent truck drivers from having adequate visibility of pedestrians utilizing the sidewalk.

In summary, cleanup activities associated with the Project are unlikely to significantly affect circulation patterns for the following reasons:

- The associated traffic increase would be relatively small, and of short duration
- Project-related traffic is compatible with the existing roadways, and would travel on existing truck routes
- If needed, Project-related traffic would be restricted to hours after the morning commute peak (after 9:00 a.m.) and before the afternoon commute peak (before 3:00 p.m.), and traffic control would reduce the potential for impacts to vehicular traffic
- Traffic control would reduce the potential for impacts to pedestrian or bicycle traffic
- Project activities would not affect mass transit, as activities will not interfere with Del Monte Avenue

Therefore, the Project would not conflict with applicable plans, ordinances, or policies related to the pedestrian and bicycle performance of the circulation system and would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

Impact Analysis:
The Project would result in an estimated maximum of approximately 710 total round trips by haul trucks or vacuum trucks during excavated material export and approximately 690 total round trips by dump trucks during backfilling of the excavation (less if excavated material is determined to be suitable for that purpose) over the course of approximately 5 months. The remaining cleanup actions would require fewer truck trips and would involve smaller vehicles in general. Project-related vehicles would travel on designated truck routes (Figure 6) already being used by commercial vehicles, and would not drive on residential streets or on streets adjacent to schools. In addition, the Project includes the use of temporary traffic and engineering controls (i.e., fences, barricades, signs, caution marking, and/or traffic control staff/flaggers) as necessary; these traffic controls may apply to vehicles, bicycles, and/or pedestrians.

There is a high existing traffic volume on main roadways in the Project Site vicinity; for example, daily traffic on Del Monte Avenue, one of the main truck routes, is estimated at 25,700 vehicles (TAMC 2020). Project-related traffic would represent a small incremental increase (typically 30 vehicles per day, or less than 1 percent of the current traffic load observed for Del Monte Avenue). In addition, the Project-related vehicles are consistent with the types of vehicles currently using the roads in the Project area, and the construction activities are short term.

Traffic circulation improvements envisioned in the Monterey General Plan would be implemented after the Project activities are completed. With the traffic controls noted above, Project-related traffic would not impede the use of bicycle path facilities. Impact to pedestrian walkways along Del Monte Avenue and Figueroa Street around the Project Site would be minimized because the majority of the Project activities would occur within the perimeter walls. Furthermore, the Project does not include the construction of any structures that would impede the circulation improvements in the General Plan.

In consideration of the above, the Project would not conflict with an applicable congestion management plan, and the impact would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. Result in a change in air traffic patterns, including an increase in traffic levels or a change in location that results in substantial safety risks.

Impact Analysis:
The Project activities would not require air travel or transport; Project workers, supplies, and equipment would travel to the Project Site using ground transportation. In addition, the Project does not involve the construction or alteration of any structures (e.g., tall buildings or antennae) that could affect air traffic patterns. Traffic control activities would conform to the applicable specifications of the *Manual of Traffic Controls for Construction and Maintenance Work Zones* (Caltrans 1996). Based on the above considerations, the Project would have No Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis:
The Project does not involve any modifications to existing roadways other than the addition of a second driveway onto Figueroa Street. The addition of this second driveway would increase the efficiency of the Project-related traffic flow, and reduce the potential for blockage of the nearby streets that could present hazardous conditions.

If the construction operations temporarily create potentially hazardous conditions to traffic, traffic control measures such as fences, signs, and other devices would be used to direct traffic and prevent vehicle accidents or injury to people. No materials or equipment would be stored where it would interfere with the free and safe passage of facility personnel. Vehicles associated with the work would be required to follow all applicable speed limits and traffic laws. Construction vehicles not intended for roadway use (such as excavators, backhoe, bulldozer, or grader), would not be present on roadways except as loaded on suitable transport vehicles; therefore, the Project would introduce no incompatible road uses. At the end of each day's work and at other times when construction operations are suspended for any reason, obstructions would be removed from roadways to allow unrestricted use.

An appropriate traffic control plan would be provided to the City of Monterey for informational purposes. An appropriate temporary traffic control plan shall be submitted to the City of Monterey prior to any encroachment of sidewalk, bike lanes and/or travel lanes, and would adhere to all rules and regulations to protect vehicles, pedestrians, and site workers. Detours, if necessary, would be created in accordance with the traffic control

plan. Impacts on road use would be short term, with an anticipated duration of up to approximately 5 months, and there would be no permanent impacts to the road design.

Because the Project would not introduce roadway design features or incompatible uses, the Project would result in No Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Result in inadequate emergency access.

Impact Analysis:
Nearby roadways would be used by Project vehicles when entering or leaving the Project Site, but that use would not significantly affect use by emergency vehicles. Appropriate traffic control plans would be followed (and provided for informational purposes to the City of Monterey), so the Project activities would not significantly impede access to roads, including emergency access routes. The street system in Monterey provides for a variety of routes for emergency ingress or egress; if one route is being used by Project-related vehicles (e.g. Figueroa Street) such that access by emergency vehicles would be impeded, other routes are available for emergency access.

Vehicles transporting excavated materials or imported fill materials for backfill would be present at the Project Site for short periods during loading and unloading activities. The presence of these vehicles and other heavy equipment could restrict emergency access onto the Site; however, emergency routes and procedures would be established and maintained in the Project-specific Health & Safety Plan. The addition of the second driveway would improve ingress to and egress from the Project Site in the event of an emergency.

With proper emergency planning as noted above, Project-related impacts would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Impact Analysis:
As noted above, the public transportation system in Monterey is limited to fixed-line bus transport, and the nearest station to the Project Site is on Del Monte Avenue. As noted above the Project-related traffic would not impact public transportation occurring on Del Monte Avenue.

Pedestrian walkways adjoin the Project Site to the north, east, and south; Figueroa Street to the east contains an established bicycle path. The traffic control plan for the Site would include measures to safely divert bicycle and pedestrian traffic, as needed. These measures would include the use of delineators, signage, and/or flaggers. Project-related impacts to pedestrian and bicycle circulation would be limited, involving short-term blockage 1) during the construction of the access gates and driveway, and 2) as trucks enter/exit the work area. Project-related road use would be short term, anticipated to last approximately 5 months. There would be no change in road design other than the addition of the second driveway.

Therefore, the Project would not significantly conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, and there would be Less Than Significant Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used:

Association of Monterey Bay Area Governments (AMBAG). 2018. *2040 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties: Final Environmental Impact Report*. Monterey, CA.

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18. Tribal Cultural Resources

Project Activities Likely to Create an Impact on Tribal Cultural Resources:
Project activities that could potentially impact Tribal cultural resources are construction activities involving disturbance of subsurface soils where Native American artifacts may be present, including:

- Demolition of surface/subsurface features including compacted gravel, concrete foundations, vaults, slabs, shed with overhang, concrete block wall, and utilities (known and unknown); and excavation/removal of contaminated soil, concrete, asphalt, and/or wood using heavy construction equipment (such as an excavator, backhoe, bulldozer, jack hammer, and/or grader)
- Subsurface sample collection involving the use of a drill rig

Work activities are anticipated to consist of an average of 7 feet of excavation. These excavations will generally be restricted to artificial fill material, a heterogeneous unit consisting of poorly graded sand with silt and clay fines. The artificial fill is underlain by unconsolidated alluvium.

Description of Baseline Environmental Conditions:
Between 500 BCE and 500 CE, early indigenous inhabitants, particularly the Rumens people of the Ohlone-Costanoan language family, settled the area that would become Monterey. From this time until the arrival of the Spanish in 1770, the Rumens lived in stable, semi-permanent villages with smaller camps for seasonal food collection. An estimated five semi-permanent Rumen villages were present in the Monterey area (City of Monterey 2012). Native American resources are known to be present in Monterey County.

As detailed in Section 5, Cultural Resources, a search of restricted records at the Northwest CHRIS Center identified no listed historic resources within the Project Site. Four listed or eligible historic properties were identified within ¼ mile of the Project Site, along with additional historic resources are either not listed or unevaluated for inclusion on the National Register of Historic Places. No Tribal Cultural Resources were identified.

A review of the Sacred Lands File search, requested on March 6, 2020 by DTSC Tribal Affairs, returned positive results according to the Native American Heritage Commission (NAHC) on March 12, 2020 for the immediate area

of the project site. The Native American Heritage Commission also provided a list of eight Native American contacts representing the different Tribal groups historically and culturally affiliated with the geographic area of the site. The Office of Environmental Equity – Tribal Affairs (Tribal Affairs) sent Tribal engagement letters on June 5, 2020 to the eight identified contacts providing detailed information on the proposed remedial activities for this site.

On July 1, 2020 and September 4, 2020, respectively, three of the eight Tribal governments (the Amah Mutsun Tribal Band of Mission San Juan Bautista, the Esselen Tribe of Monterey County, and the Ohlone/Costanoan-Esselsen Nation), responded and requested that a compensated, 40-Hour HAZWOPER certified Native American Monitor be present during ground disturbing activities, that all project field staff receive Cultural Sensitivity training conducted by a Tribal representative or Native American Monitor, and lastly, requested the presence of a field-certified archeologist during ground disturbing activities. PG&E has agreed to the presence of a Tribal representative, Native American Monitor, or field-certified archeologist during all ground disturbing activities. In the event of accidental discovery of potential cultural, tribal cultural, or archaeological resources, ground-disturbing project activities in the immediate area and surrounding 50 feet will be immediately suspended. DTSC staff, tribal representatives, and the property owner are also to be immediately notified and informed. After discussion with their Tribal Chairperson or respective Cultural Resources Managers or Tribal Historic Preservation Officers, and in collaboration with DTSC and the property owner, any measures deemed necessary to record and/or protect the cultural or archaeological resource(s) will be implemented.

Analysis as to whether or not project activities would:

a. *Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either of the following; sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are that is geographically defined in terms of the size and scope*

   i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)., or*

   Impact Analysis:

   No resources are present that are consistent with Public Resources Code section 5020.1(k). Therefore, the Project would result in a Less than Significant Impact.

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☒ Less Than Significant Impact
   ☐ No Impact

   ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

   Impact Analysis:

   A review of NAHC's Sacred Land File indicates that Native American tribal cultural resources are present in the area near the project site. As noted above, DTSC's Tribal Affairs has completed necessary tribal engagement pursuant to Assembly Bill 52 as part of their CEQA review process for the Project. Tribal Cultural. Multiple tribes, three of the eight Tribal governments identified on the Native American contact listing, responded and requested that a compensated, 40-Hour HAZWOPER certified Native American Monitor be present during ground disturbing activities, that all project field staff receive Cultural Sensitivity training conducted by a Tribal representative or Native American Monitor and lastly, they request the presence of a field-certified archeologist during all ground disturbing activities.

   As noted in the Project Controls section of the Project Description, all project field staff would be notified prior to the start of work regarding the potential for tribal cultural resources to be encountered, and the proper procedures to be undertaken in the event that items of potential tribal cultural interest are encountered during excavation activities. All project field staff would be instructed not to touch, move, or take photographs or videos of suspected artifacts or remains. Work in the immediate area and surrounding 50 feet would immediately be suspended the Tribal representative or Native American Monitor would discuss with their Tribal Chairperson or respective Cultural Resources Manager or Tribal Historic Preservation Officers. Any measures deemed

necessary to record and/or preserve the cultural resource(s) would be implemented in collaboration with DTSC and the property owner.

Based on the above considerations, there would be a Less than Significant impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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Native American Heritage Commission

19. Utilities and Service Systems

Project Activities Likely to Create an Impact on Utilities and Service Systems:
Project activities that could potentially impact utilities and service systems are construction activities that could increase demand on water supplies or waste disposal/recycling facilities, including:

- Environmental sampling and geotechnical testing using drill rigs, which would require water for decontamination purposes, and would produce investigation-derived waste requiring offsite disposal
- Construction of driveways to facilitate ingress/egress during which water would be used for dust suppression, and construction debris and other waste requiring offsite disposal/recycling would be generated
- Excavation/removal of contaminated soil, concrete, asphalt, and/or wood, during which water would be used for dust suppression and decontamination, and waste requiring offsite disposal/recycling would be generated
- As needed, dewatering of the excavation during the excavation phase, which would be containerized and either treated and discharged in accordance with permit requirements, or disposed of at a properly licensed, off-site facility
- Site restoration including backfill of the excavated area, during which water would be used for dust suppression

Description of Baseline Environmental Conditions:

Monterey One Water provides sewer and wastewater treatment to 11 cities, including the City of Monterey. It processes over 18.5 million gallons of wastewater a day, recycling approximately 60 percent of all intake water (Monterey One Water 2017). Water services are provided to the City of Monterey by Cal-American Water Company (City of Monterey 2020d).

Utility services are supplied by AT&T and Comcast (cable, internet, phone); PG&E (Power); and Monterey Regional Waste Management (Landfill) (City of Monterey 2020d). Table PD-2 (see Project Description) presents the additional licensed landfills that are expected to service the Project; as of the date of this study, these landfills have adequate capacity to serve the limited waste disposal/recycling needs of the Project.

Analysis as to whether or not project activities would:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Impact Analysis:
Liquid waste could be generated during Project activities as part of equipment or vehicle rinsing/washing, decontamination processes employed during sampling and cleanup activities. In addition, the water table is approximately 6.5 to 8 feet bgs, and dewatering would likely be required during excavation as specified in a Project-specific Dewatering Plan (see also Section 6.4.1 of the RDIP (ERM 2020a). The Project Team estimates that dewatering would generate approximately 100,000 gallons of groundwater.

Liquid waste would be managed in accordance with the Project-specific Waste Management Plan (Appendix C of the RDIP) (ERM 2020a). The wastewater would be containerized and either disposed appropriately offsite, or treated and discharged under permit to the City of Monterey sanitary sewer collection system. Discharge would be in compliance with the permit and flow requirements of the City of Monterey (ERM 2020b). Wastewater off-hauled for offsite disposal would be transported to appropriately licensed facilities with capacity for the waste. Therefore, the generated wastewater would not result in discharges in excess of wastewater treatment requirements, and the Project-related impacts would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:
The Project activities would involve an estimated maximum water demand of 8,000 gallons per day (during periods when significant dust suppression is required). The Project Team estimates that approximately 100,000 gallons of wastewater would be generated (primarily associated with dewatering). Liquid waste would be containerized and either treated prior to discharge under permit to the City of Monterey sanitary sewer system, or disposed offsite at an appropriate disposal facility (Table PD-2). Because the wastewater would be containerized until the appropriate disposal approach is identified, the waste would only be disposed of after determining that the disposal facility/sewer system could accommodate it. Therefore, the Project would not require expansion of existing water or wastewater facilities or the construction of new facilities and there would be No Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:
After removal activities are complete, the existing drainage inlet and ditch would be restored; as such, the Project would not substantially alter the existing drainage pattern of the Site. Additionally, finished grades will establish appropriate drainage to the Project Site (ERM 2020a). Therefore, the Project activities would not require the construction of new storm water drainage facilities or the expansion of existing facilities and there would be No Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Impact Analysis:
Up to approximately 8,000 gallons per day of water would be needed for vehicle and equipment decontamination, and dust control during Project implementation. This volume of water is comparable to what is typically required for construction projects. Existing water supply from the City of Monterey would be used, thus existing entitlements and resources would be sufficient. Therefore, Project-related impacts would be Less Than Significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Impact Analysis:
As noted above, liquid waste would be generated by dewatering during excavation, if needed. Wastewater would also be generated from other Project-related activities, such as personnel, equipment, and/or vehicle decontamination. Project-related wastewater would be containerized and: (1) treated, if needed to meet discharge requirements, and discharged under permit to the City of Monterey sanitary sewer collection system; or (2) disposed offsite at an appropriately licensed facility, after it is determined acceptable for management at that facility and the facility confirms it has adequate capacity for the waste. The discharge permit would specify quality and quantity limitations to which the discharge would adhere. If the volume of wastewater exceeded those limits, the offsite disposal approach would be employed.

Because the wastewater would be containerized until the appropriate disposal approach is identified, the waste would only be disposed of after determining that the disposal facility/sewer system could accommodate it. Therefore, there would be No Impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis:
Waste associated with Project activities would be disposed of in appropriately-licensed offsite facilities with sufficient permitted capacity to accept the solid waste generated from Project activities (Table PD-2 of Project Description). Facilities included in Table PD-2 can accept a variety of wastes, including nonhazardous, California-hazardous, and RCRA-hazardous. The waste would be sampled and analyzed in advance of transport, and the destination landfill would use the testing results to confirm that it is able to accept the waste (by type and volume). The volume of waste anticipated for the Project (10,000 cubic yards) is typical of many cleanup projects, and one or more of the facilities provided in Table PD-2 would be able to adequately service the Project. Therefore, Project activities are expected to have No Impact related to the permitted capacity of landfills.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

g. Comply with federal, state, and local statutes and regulations related to solid waste.

Impact Analysis:
Project activities including disposal/recycling of waste would be conducted in accordance with the Project-specific Waste Management Plan (Appendix C of the RDIP (ERM 2020a)) and would comply with federal, state, and local statutes and regulations. Therefore, Project activities are expected to have No Impact with regard to federal, state, and local statutes and regulations related to solid waste.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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ERM. 2020b. *Remedial Design and Implementation Plan Former Monterey-1 MGP Electrical Substation, 498 Del Monte Avenue, Monterey, California*. 18 December.

20. Wildfire

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions:
The Project Site is in downtown Monterey in a mixed business and residential area with Del Monte Avenue to the north, E. Franklin Street to the south, and the City of Monterey Sports Complex to the west (Figure 2). For approximately 86 years prior to the planned cleanup activities, the Project Site contained structures associated with an electrical substation (ERM 2020a). PG&E will temporarily de-energize the electrical substation and remove the above-grade equipment to prepare for installation of an upgraded electrical substation. The cleanup actions would be performed while the substation is inactive, and the Project Site is vacant.

Wildlands pose a hazard because they are susceptible to wildfire. Maps identifying areas posing threat of wildland fires have been prepared by state and local agencies (Cal Fire 2008). Based on review of those maps, the Project Site and adjacent areas are identified as “Urban Unzoned” and are in a Local Responsibility Area (LRA), which are lands on which neither the state nor the federal government has any legal responsibility for providing fire protection. The closest areas classified as very high fire hazard severity zones are approximately 0.6 mile southwest of the Project Site.

The Project Site is not in or near any State Responsibility Areas and is not within an area classified as a very high fire hazard severity zone (Cal Fire 2008); consequently, no further analysis is required.

Analysis: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

  Impact Analysis:
  Conclusion:
  ☐ Potentially Significant Impact
  ☐ Potentially Significant Unless Mitigated
  ☐ Less Than Significant Impact
  ☒ No Impact

- *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

  Impact Analysis:
  Conclusion:
  ☐ Potentially Significant Impact
  ☐ Potentially Significant Unless Mitigated
  ☐ Less Than Significant Impact
  ☒ No Impact

- *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

  Impact Analysis:
  Conclusion:
  ☐ Potentially Significant Impact
  ☐ Potentially Significant Unless Mitigated
  ☐ Less Than Significant Impact
  ☒ No Impact

- *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

  Impact Analysis:
  Conclusion:
  ☐ Potentially Significant Impact
  ☐ Potentially Significant Unless Mitigated
  ☐ Less Than Significant Impact
  ☒ No Impact

References Used:

Environmental Resources Management (ERM). 2020a. *Soil Remediation Feasibility Study and Remedial Action Plan, Former Monterey-1 Manufactured Gas Plant Electrical Substation, 498 Del Monte Avenue, Monterey, California.* 18 December.

Cal Fire, California Department of Forestry and Fire Protection. 2008. *Very High Fire Hazard Severity Zones in LRA (Monterey)*. Accessed online 2/21/20 at: https://osfm.fire.ca.gov/media/5870/monterey.pdf

21. Mandatory Findings of Significance

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. *The project ☐ ~~has~~ ☒ does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.*

The Project would have a positive impact on the environment by removing potential sources of contamination in soil, wood, asphalt, and concrete at the Project Site, which could also reduce potential impacts to surface water and groundwater quality. The Project areas temporarily disturbed by the cleanup activities would not impact the habitats of endangered and nonendangered species, including migratory species, or offshore habitats. There are no identified natural habitats, wildlife corridors, or endangered species in the Project area. Based on the evaluation presented in Section 4.0 (Biological Resources), there would be a less than significant potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, and reduce the number or restrict the range of a rare or endangered plant or animal. The Project has been designed to reduce the potential for impacts to the only known cultural resources in the area (the historical building at the northeast corner of the PG&E Property). In addition, precautions would be followed to ensure there is no damage to Tribal cultural resources in the event such are encountered in the subsurface during excavations, including the presence of a Native American Monitor during ground disturbing activities. As a

result, the remediation activities should not have adverse effects to known or unknown cultural resources or to significant Native American artifacts.

b. The project ☐ ~~has~~ ☒ does not have impacts that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The proposed activities are limited in areal extent and duration, would result in the construction of no new structures/buildings, and would return the ground surface to pre-Project conditions. Post-cleanup Project conditions would therefore have No Impact. During construction activities, the potential exists for impacts to air quality, cultural resources, GHG emissions, hazards/hazardous materials and noise through the operation of Project-related equipment, transport of contaminated materials, and disturbance of subsurface conditions; however, Project controls and other BMPs (including regulatory requirements) would be instituted to reduce those impacts to Less Than Significant. In addition, proper Project planning would reduce the potential for upset conditions to result in significant impacts. Air quality/GHG emission impacts have been analyzed relative to regulatory thresholds, which were established assuming other potential sources in the region; Project-related impacts were found to be within those thresholds. In consideration of the above, potential impacts from Project activities would not be cumulatively considerable.

c. The project ☐ ~~has~~ ☒ does not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

This Initial Study has concluded that there would be No Impact or Less Than Significant Impacts associated with the wide-range of environmental impacts that were analyzed. These analyses considered direct and indirect impacts to humans and the environment. Project activities would be conducted in areas that are developed, and the ground surface would be returned to pre-cleanup conditions after the cleanup actions are complete; the only change would be the removal of contaminated materials from the Site. Project controls would be employed to reduce potential impacts, as described in the FS/RAP (ERM 2020a) and RDIP (ERM 2020b). In addition, Project activities would be conducted in accordance with applicable local, state, and federal laws, many of which have been established specifically for protection of human health and the environment. Accordingly, there is no evidence before DTSC that the proposed Project would have a substantial adverse effect on human beings, either directly or in-directly.

Determination of Appropriate Environmental Document:

Based on evidence provided in this Initial Study, DTSC makes the following determination:

☒ The proposed project COULD NOT HAVE a significant effect on the environment. A **Negative Declaration** will be prepared.

☐ The proposed project COULD HAVE a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.

☐ The proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.

☐ The proposed project MAY HAVE a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.

☐ The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

Certification:

I hereby certify that the statements furnished above and in the attached exhibits, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

Sagar Bhatt		5/25/21
Preparer's Signature		Date
Sagar Bhatt	Environmental Scientist	(510) 540-3844
Preparer's Name	Preparer's Title	Phone #
Juliet C. Pettijohn		05/25/2021
Branch Chief's Signature		Date
Julie Pettijohn	Environmental Program Manager I	(510) 540-3843
Branch Chief's Name	Branch Chief's Title	Phone #

ATTACHMENT A

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ATTACHMENT B

Jacobs

Memorandum

Subject	Historical Evaluation of the Pacific Gas and Electric Company Monterey Substation and 498 Del Monte Avenue, Monterey, Monterey County, California
Project Number	D31111DU
Attention	Melitta Rorty, Pacific Gas and Electric Company
From	Jeremy Hollins, MA, and Kelly Morgan, MPS, Jacobs Engineering Group, Inc.
Date	July 31, 2020
Copies to	Veronica Shannon, Environmental Resources Management

1. Introduction

At the request of Pacific Gas and Electric Company (PG&E), Jacobs Engineering Group, Inc. (Jacobs) prepared this historical evaluation of 498 Del Monte Avenue and the PG&E Monterey Substation for the City of Monterey Division of Planning, Engineering, and Environmental Compliance Architectural Review.

The facility is an active electrical distribution substation in Monterey, California, that occupies a rectangular-shaped parcel bounded by Del Monte Avenue to the north, Figueroa Street to the east, East Franklin Street to the south, and the Monterey Sports Complex to the west (Attachment A, Figure 1).

The project site includes a building in the northeastern corner of the parcel that is currently used as the control building for the substation (498 Del Monte Avenue) (Attachment A, Figures 2 through 3). Based on review of as-builts, this building was originally constructed in 1926 as a substation for a former steam electric plant (SEP) and represents the only remaining portion of this earlier plant. In addition, the project site includes a carport in the northwestern corner of the parcel built between 1949 and 1956 (Attachment A, Figure 4), and the PG&E Monterey Substation consisting of electrical equipment, including transformers, switches, and breakers, installed in the center of the parcel sometime between 1962 and 1967 (date ranges based on inspection of historic maps and aerials as well as historic newspaper databases; discussed in more detail in Section 3) (Attachment A, Figures 5). Tall stucco-coated walls, approximately 26-feet tall, border the substation electrical equipment to the north, east, and south to create a false façade, and a smaller stucco-coated perimeter wall encloses the entirety of the parcel (Attachment A, Figures 6 through 8). These walls were constructed sometime between 1962 and 1967, likely contemporaneously with the installation of the electrical equipment.

PG&E proposes the following improvements to the project site:

- Widening the existing gate and driveway north of the intersection at Figueroa and East Franklin streets and construction of a new access gate and driveway along Figueroa Street. These improvements will require removal of portions of the perimeter wall for construction of the new access gate.
- Widening the existing opening in the southern interior wall to the west of the substation electrical equipment.
- Removal of the existing interior wall to the north of the substation electrical equipment and construction of a new wall approximately 30 feet to the north. It is also possible that the existing

interior wall may be re-used and relocated, instead of constructing a new one. The interior wall will connect to the perimeter wall.

- Demolition of the carport located in the northwestern corner of the parcel.

This memorandum includes a summary of the field and research methodologies completed in July 2020; an evaluative historic context for the property's multiple phases of development, first as a SEP and manufactured gas plant (MGP) in the early 1900s, and later as the PG&E Monterey Substation; and an historical evaluation of the building at 498 Del Monte Avenue and the PG&E Monterey Substation in accordance with the significance criteria for the California Register of Historical Resources (CRHR) and Monterey Criteria for Historic Zoning (*Monterey City Code* Chapter 36 Article 15 § 38-73[F]). In addition, an assessment of the project's compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (SOIS) is also provided.

Overall, this assessment recommends 498 Del Monte Avenue and the PG&E Monterey Substation as not eligible for listing in the CRHR and the City of Monterey criteria, and that the proposed improvements would be consistent with the SOIS.

2. Methodologies

All fieldwork and research were completed by investigators who meet the Secretary of the Interior's professional qualification standards in history and architectural history.

On July 20, 2020, architectural historian Mark Bowen completed a reconnaissance field survey of the property and its current setting. As part of the survey, alterations and modifications to the facility were identified to assess changes to its physical and historic integrity, based on a review of historic plans, photographs, and images. Field notes and photographs documenting the facility and its setting also were completed.

In July 2020, architectural historians Kelly Morgan and Jeremy Hollins completed primary and secondary source research of the property. Research was completed through review of the following sources:

- PG&E Headquarters and Corporate Archive
- Historic newspaper databases
- Sanborn Fire Insurance maps
- Journals and other professional publications
- Environmental reports and studies
- Trade literature and publications
- Historic plans and specifications
- Historic maps and aerial photograph websites
- Engineering drawings and as-builts
- Books relating to the history of PG&E and the history of energy in California

Furthermore, staff at the Monterey County Historical Society as well as Jennifer Smith, local history librarian at the Monterey County Free Libraries system, were contacted for access to materials pertaining to the history and use of the site. Due to COVID-19 restrictions, these repositories were not able to provide

information and were not open to the public. Instead, online research also was conducted with these repositories.

Ms. Morgan and Mr. Hollins also completed the historical evaluation of the property.

3. Evaluative Historic Context

To properly assess the potential historical significance of the former SEP substation at 498 Del Monte Avenue and the PG&E Monterey Substation, the following provides an evaluative historic context that spans the property's multiple periods of development.

Historic Context

MGPs and SEPs operated throughout the United States during the second half of the nineteenth century, including in California. The "first gas utility in all the West", the San Francisco Gas Company, was organized in 1852 to produce and distribute manufactured gas to light the city's street lamps (Coleman 1952:12). By 1870, MGPs operated in nine additional communities in the state (Williams 1997). Around this time, electricity arrived in California, and the California Electric Light Company incorporated in San Francisco in 1879 as the state's first electric utility (Coleman 1952). The company relied on an SEP to generate electricity for street lighting. Although other SEPs were built in the state in the decades that followed, according to historian James Williams, hydroelectric plants that generated electricity, using falling water, "resulted in widespread adoption of electricity in the early-twentieth century California" (1997:171). Notably, the San Francisco Gas Company and California Electric Light Company were early predecessors of PG&E, which was formed in 1905; therefore, PG&E has a long association with MGPs and SEPs.

Interestingly, although manufactured gas and electricity represented competing energy sources, research shows that during the late nineteenth and early twentieth centuries, many companies produced both products. Further, MGPs and SEPs often were collocated. This was because the plants used similar energy sources: MGPs first used coal or wood and then oil and steam to produce gas, while SEPs utilized wood- and coal-fired boilers to turn steam-driven generators to produce electricity. Following this trajectory, early gas and electric companies in Monterey County constructed MGPs and SEPs under the same roof. This included the Monterey Gas and Electric Company, which built an MGP and SEP in the same building within the square block bounded by Del Monte Avenue and Figueroa, East Franklin, and Adams streets between 1902 and 1903 (described in more detail below), and the Salinas City Light and Water Company, which built an MGP and SEP in the same building in Salinas in 1873 (Pacific Coast Electric Transmission Association [PCETA] 1904).[1] Therefore, the Salinas plants (no longer extant) preceded the Monterey MGP and SEP by three decades.

[1] In 1903, the Monterey Gas and Electric Company acquired the Salinas MGP/SEP, and became known as the Monterey County Gas and Electric Company (Pacific Coast Electric Transmission Association 1904). In 1912, a successor to that company, the Coast Valleys Gas and Electric Company, purchased an SEP in King City, Monterey County (that plant was built in 1908) (California Public Utilities Commission, Railroad Commission of the State of California [CPUC] 1918). Therefore, the Salinas MGP/SEP, King City SEP, and Monterey MGP/SEP were under the same ownership for much of their history. By 1918, power lines connected the Coast Valleys Gas and Electric Company-

A proliferation of manufactured gas and electric companies occurred within California as the demand for energy increased during the early twentieth century. This included the Monterey Gas and Electric Company, which was incorporated in 1902 and constructed the first MGP and SEP within the square block bounded by Del Monte Avenue and Figueroa, East Franklin, and Adams streets between 1902 and 1903 (PG&E 1986). This area is larger than the current PG&E parcel, which is presently bounded by the Monterey Sports Complex instead of Adams Street to the west.

Review of the 1905 Sanborn Fire Insurance map shows a long rectangular building occupying the corner of Del Monte Avenue and Adams Streets (on land currently developed with the Monterey Sports Center)(Attachment A, Figure 9). The building held both an SEP and a small MGP (labeled "Gas Works"). Other facilities within this area included an oil tank, a large cylindrical gas holder, and a small, square-shaped pipe house at the intersection of East Franklin and Adams streets where gas was pressurized and distributed through pipelines to the communities of Monterey and Pacific Grove (PCETA 1904).

The 1905 Sanborn Fire Insurance map also shows a "car house" at East Franklin and Adams streets (the Monterey Gas and Electric Company operated an electric streetcar between Monterey, Del Monte, and Pacific Grove) (PCETA 1904). The only portion of this square block that Monterey Gas and Electric Company did not own was "Parcel A" in the northeastern corner of the area at Del Monte Avenue and Figueroa Street (PG&E 1986). The building at 498 Del Monte Avenue later was constructed on part of that parcel during an expansion of the plant in the mid-1920s; however, Parcel A was undeveloped in the 1905 and 1912 Sanborn Fire Insurance maps.

A 1908 trade journal states that increases in the Monterey County Gas and Electricity Company's power demands prompted plans for the expansion of the Monterey SEP and MGP (PCETA 1908). This expansion was completed the following year, in 1909 (Hatheway 1999; *Monterey Daily Cypress* 1909:October 6). The California Consolidated Light and Power Company acquired the Monterey MGP/SEP shortly thereafter in

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owned SEPs in Salinas and King City, and the SEPs in Salinas and Monterey (CPUC 1918). A 3,000-kilowatt substation owned by the Sierra and San Francisco Power Company also operated in Salinas by this time; by comparison, the Coast Valleys Gas and Electric Company Monterey, Salinas, and King City SEPs had 1,000, 300, and 75-kilowatt capacities, respectively (CPUC 1918).

Research uncovered one electricity plant in Monterey constructed prior to 1903. That plant was built by the Monterey Electric Light & Development Co., which incorporated in 1891 to conduct real estate and produce electricity. It is unclear if the plant was an SEP, but given the time period, this was likely. The company closed in 1902 and its plant was removed; however, its franchise and distribution system were sold to Monterey Gas and Electric Company (Fowler 1923).

Additionally, research uncovered that one MGP in Monterey preceded the Monterey Gas and Electric Company gas works, and operated during the late nineteenth century. This was a gas works on the grounds of Hotel del Monte, a luxury resort fronting Del Monte Avenue approximately 0.8 mile east of the PH&E Monterey Substation (Hittell 1885; PG&E 1986). Information on the gas works is limited, but PG&E never owned the plant, which appears only to have serviced the hotel (PG&E 1986). Therefore, although the majority of MGPs were owned by corporations, the Hotel del Monte appears to have been privately owned.

1911, and the property was transferred to the newly-organized Coast Valleys Gas and Electric Company the following year.

Around this time, the 1912 Sanborn Fire Insurance map depicts changes to the complex since the 1905 map. This included the conversion of the portion of the building formerly used as an SEP into a larger gas works and the construction of a new SEP (labeled "Turbines & Generators") along Del Monte Avenue (Attachment A, Figure 10. The 1903-era car house also was enlarged, and also used as a machine shop and car repair/carpentry/storage building. New facilities in the 1912 Sanborn Fire Insurance map included two cylindrical oil tanks towards the center of parcel, new oil houses along Figueroa Street, and a water tank in the northeast corner on land currently developed with the building at 498 Del Monte Avenue.

While under Coast Valleys Gas and Electric Company ownership, the Monterey plants underwent a second phase of expansion during the 1920s as the demand for energy continued to rise. In 1922, the company acquired Parcel A at the corner of Del Monte Avenue and Figueroa Street, and in 1925, temporarily closed the plant, apparently to make improvements (PG&E 1986). A year later, the 1926 Sanborn Fire Insurance map shows that the SEP building along Del Monte Avenue (identified as a power house) had been modified through the addition of an MGP to its southwest corner (labeled as "Gas Works") (Attachment A, Figure 11). The 1926 Sanborn Fire Insurance map also shows that older buildings at the site had been adapted to new uses; the former gas works building at Del Monte Avenue and Adams Street was identified as a warehouse, and the former car house was labeled as a machine shop/warehouse/garage. New facilities in the map included a transformer house in the northwest corner of the square block (late 1920s aerials show electrical equipment here), and a large cylindrical gas holder and steel crude oil tanks located towards the center of the parcel.

Importantly, the 1926 Sanborn Fire Insurance map also depicts the footprint of a new substation at the intersection of Del Monte Avenue and Figueroa Street. This building is extant at 498 Del Monte Avenue and currently used as the control building for the PG&E Monterey Substation. It is the only remaining portion of the earlier plants at the site. Review of 1926 as-builts for the building indicates that it formerly housed four transformers and featured six electrical openings in its south wall that were outfitted with wall insulators (Attachment A, Figures 12 and 13). The openings likely provided access to the electrical equipment in the transformer house immediately south of the building. Given this, the substation appears to have been associated with the former SEP at the site rather than the MGP. This is corroborated by review of historic newspaper databases; a March 17, 1926, article, appearing in *The Californian*, indicated that construction of the substation had commenced, and stated, "This station will distribute power to the various peninsula towns and will care for the increased load occasioned by handling operations."

The building at 498 Del Monte Avenue is a 1.5-story Mission Revival-style building that occupies a rectangular footprint and terminates in a front-gable roof sheathed in clay tiles. Like other locally-prevalent architectural styles, such as the Monterey and Spanish Colonial Revival styles, the Mission Revival style is based on Spanish precedents, specifically the architecture of California missions. Reflective of the style, the building's gable-ends are hidden behind tall shaped parapets, and its exterior is covered in smooth stucco. Recessed round-arch openings are located on the property's primary (eastern) and secondary (northern) elevations that front Figueroa Street and Del Monte Avenue, respectively, and blind round-arch windows are located on the building's northern, southern, and western elevations.

Based on a review of as-builts and historic photographs, changes to the building include the infill of a rose window that was centered in the parapet on the primary elevation (Attachment A, Figures 14 and 15), removal of decorative metal sconces that flanked the entrance on the primary elevation (Attachment A, Figures 14 and 15), and infill of the six electrical openings on the southern elevation (Attachment A, Figures 3, 12, and 13). Based on as-builts, on the building's primary elevation, a plaster mold, scored to resemble voussoirs, occupied the space between the top of the entrance and the hood mold overhead. Although the scoring is still present, it is not as pronounced as it was originally (Attachment A, Figures 3 and 14).

The 1920s were a period of acquisition and consolidation in PG&E's history, and the company added large swaths of new service areas. As described by PG&E historian Charles M. Coleman, "By the end of 1927, the Company in seven years had nearly doubled the total number of customers served, which then approached the million mark. Electric capacity also had been nearly doubled, providing electricity to more than 300 Northern California communities." Along these lines, the PG&E acquired the Coast Valleys Gas and Electric Company in 1927 (Coleman 1952). PG&E continued to make improvements after it took ownership of the Monterey property, including replacing the former car house at the corner of Figueroa and East Franklin streets with a new 500,000 cubic-foot gas holder (PG&E 1986). However, the need for MGPs declined as natural gas became more widely available as the twentieth century progressed. This came as a result of the discovery of natural gas fields in California coupled with advancements in distribution systems, so the gas could travel longer distances. As such, MGPs largely were rendered obsolete:

> With natural gas present, near-universal plans were made in California to place gas generators on standby, first out of potential unreliability of the new natural gas supplies, and secondly, from reluctance to take the generators off the rate-justification books until times of more favorable write-offs to the capitalization of the newer unit. Oil gas plants [including the MGP in Monterey] were retained in working order at most California plants in response to corporate plans for as long as possible, or at least until the war clouds of the later 1930s. [Hatheway 1999:137]

Natural gas reached Monterey in 1929, and the MGP there ceased operations that December (Attachment A, Figures 16 and 17)(PG&E 1986). The MGP equipment was dismantled not long after, in 1934, coming after a downturn in the use of electricity and gas during the Great Depression (Coleman 1952; PG&E 1986).

It is unclear when the Monterey SEP ceased operations, but according to journal articles, it apparently was used for stand-by service for emergency events or peak loads for most of its functional life (CPUC 1918; Fowler 1923). This was common of other small SEPs in California, until new technology after World War II made these SEPs more productive and, therefore, more and larger SEPs were built, such as the one at Moss Landing in Monterey Bay (Coleman 1952). The Moss Landing SEP was a 340,000-kilowatt plant placed in service in 1950 to meet a booming post-war demand for energy and later was expanded for additional output (Coleman 1952). Large, centralized plants, such as the one at Moss Landing, provided electricity to large service areas and supplanted earlier, smaller plants that served local communities, such as the Monterey SEP.

The1943 Sanborn Fire Insurance map showed that the transformers formerly located to the south of 498 Del Monte Avenue were removed by this time, suggesting that the SEP there was no longer operational (Attachment A, Figure 18). Additionally, although the map depicted many of the older facilities at the property, including the former warehouse, gas holders, crude oils tanks, MGP/SEP building along Del Monte Avenue, substation (498 Del Monte Avenue) and oil storage building along Figueroa Street, it labeled the property as "Storage of natural gas & elec. sub-station only". A new, small "Natural Gas Holder" appears along Adams Street along with two new apartment buildings fronting East Franklin. This configuration is consistent with the subsequent 1949 Sanborn Fire Insurance map (Attachment A, Figure 19). Notably, a 1952 map illustrated the locations of PG&E's SEPs and hydroelectric plants and does not include the SEP at Monterey (Attachment A, Figure 20)(Coleman 1952). Thus, the plant was no longer operational.

By 1956, the Sanborn Fire Insurance map shows that the gas holders and crude oil tanks had been removed from the PG&E Monterey property and that the former MGP/SEP building along Del Monte Avenue had been demolished to make way for a building used for private truck repair (Attachment A, Figure 21). Abutting this building to the east was a new carport with 7-20 cars' capacity that likely was associated with the truck repair shop (the carport is presently extant). Therefore, PG&E may have rented out portions of the property at this time.

Although the subsequent 1962 Sanborn Fire Insurance map shows the same configuration and facilities within the parcel as the 1956 map (Attachment A, Figure 22), by 1968, an aerial shows many changes at the site, which was then used as an electrical substation (Attachment A, Figure 23). This followed a statewide increase of electrical substations due to an increase in population in the decades following World War II. According to the 1962 Sanborn Fire Insurance map, the oil storage building along Figueroa Street had been removed and replaced with electrical equipment that was bordered by walls to the north, east, and south (the equipment and walls are presently extant). Walls also appear to enclose the site in the aerial (enclosure walls are presently extant).

Based on review of historic newspaper databases, the substation at Monterey was planned as early as 1964. For example, a March 19, 1964, article in *The Californian* indicated that PG&E sought to install a new electric transmission line to a "proposed addition to the Del Monte substation in Monterey." Because the building at 498 Del Monte Avenue and the adjacent carport already were constructed by 1964, this "proposed addition" likely corresponded with the addition of electrical equipment at the site.

PG&E sold off the western half of the property between 1965 and 1967 (PG&E 1986). An advertisement placed by the company in *The Californian* on September 5, 1967, documented that electrical equipment had been installed at the substation by this time, and extolled the substation's beauty, stating:

> Our Monterey Substation doesn't look like it houses switches, transformers and other heavy duty electrical equipment.
>
> But it does look like the Mission architecture of old Monterey. And that's the idea.
>
> We've remodeled this substation as part of our "Beautility" program – to blend our architecture with the historic beauty of the community. "Beautility" is our word to you that

> when we build or remodel, we want to be attractive as well as useful. [Attachment A, Figure 24]

Therefore, based on review of aerials, maps, and newspaper databases, the extant buildings and structures within the project site had been constructed by 1967, and currently forms part of PG&E's network located throughout California.

4. Determination of Eligibility

The former substation at 498 Del Monte Avenue is listed on the City of Monterey's Master Historic List and is identified by the Resource Status Code "7N", corresponding to "Needs to be reevaluated" (City of Monterey 2019). The rest of the property, including the PG&E Monterey Substation, has not been evaluated for historical significance.

For this project, the significance of the former substation at 498 Del Monte Avenue and the PG&E Monterey Substation were determined by applying the procedures and criteria for CRHR eligibility. Notably, the CRHR criteria align with the City of Monterey Criteria for Historic Zoning (City of Monterey 2020). A resource is considered to be historically significant if it meets any of the following criteria for listing in the CRHR (defined in Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 4852):

- ***Criterion 1:*** It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the U.S.
- ***Criterion 2:*** It is associated with the lives of persons important to local, California, or national history.
- ***Criterion 3:*** It embodies the distinctive characteristics of a type, period, region, or method of construction; or represents the work of an important creative individual; or possesses high artistic values.
- ***Criterion 4:*** Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to these criteria, a resource must retain sufficient historic integrity to be considered historically significant. Integrity is the authenticity of the physical identity that is evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity must be evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

Based on site investigations and historic research, the building at 498 Del Monte Avenue and the PG&E Monterey Substation are recommended as not eligible for listing in the CRHR or considered a historical resource in accordance with the City of Monterey Criteria for Historic Zoning.

Criterion 1

Under CRHR Criterion 1, the former substation at 498 Del Monte Avenue and the PG&E Monterey Substation as a whole have no significant association with the broad patterns of local or regional history, or the cultural heritage of California or the United States. Therefore, they are not eligible for listing under this criterion.

The building at 498 Del Monte Avenue was constructed in 1926 as part of a former SEP at the location. It represents a small component of a much larger complex that included an MGP/SEP building, a transformer house, gas holders, water and oil tanks, and oil houses, among others. It was built as a small ancillary structure to a much larger facility and, on its own, is not representative of any major themes associated with power generation and distribution in Monterey or northern California. Because other early facilities at the site have all been demolished, 498 Del Monte Avenue is no longer is able to convey its association as a substation supporting an SEP, and is presently an altered building that no longer possesses a strong link to the previous power activities at the site. SEPs were commonly built throughout California during the nineteenth and twentieth centuries, and this former substation does not distinctively illustrate this pattern of events. Other buildings, such as the SEP themselves, would better convey this significance, especially when considering the significance of PG&E and its predecessor companies.

The PG&E Monterey Substation was constructed during a period of tremendous growth by PG&E in the 1960s, as the company upgraded existing facilities and built new ones to serve an expanding customer base. Therefore, the facility was one of many electrical distribution stations built during this time that served the same function, and this single substation does not stand out as particularly important within the PG&E system or electrical distribution development in the state. Although newspaper advertisements tout it as part of PG&E "Beautility" campaign, wherein substations were designed to be harmonious with their surroundings or were beautified with landscaping, so too were many other PG&E substations throughout the state. Therefore, the Monterey Substation also does not embody this PG&E trend of beautifying substations during the 1960s.

Criterion 2

498 Del Monte Avenue and the PG&E Monterey Substation are not directly associated with the lives of persons important in our past. This includes J.J. O'Brien, president of the Coast Valleys Gas and Electric Company when 498 Del Monte Avenue was constructed in 1926, or leaders of PG&E when the substation was developed in the 1960s, such as James Byers Black or A. Emory Wishon. The property does not have a direct link or association with these individuals, and does not illustrate their contributions to power generation in West or to the rise of PG&E as a major utility provider. Therefore, 498 Del Monte Avenue and the PG&E Monterey Substation and are not eligible for listing in the CRHR under Criterion 2.

Criterion 3

Under CRHR Criterion 3, 498 Del Monte Avenue and the PG&E Monterey Substation do not embody the distinctive characteristics of a type, period, region, or method of construction, represent the work of a master, or possess high artistic values. Therefore, they are not eligible for listing under this criterion.

The original design of 498 Del Monte Avenue was modified through the infill of a rose window, the removal of sconces on the primary elevation, and infill of electrical openings on the southern elevation. As a result, the resource's appearance has been modified from its original construction, when it served as a substation for an SEP at the site. Other substations were built throughout the state during the nineteenth

and twentieth centuries, and the building at 498 Del Monte Avenue does not represent a rare or distinctive property type. The building does not represent a variation or evolution within the design of substations, and is not significant for its high artistic value. As is evidenced by the City of Monterey's *National Historic Landmark District and Downtown Area Context Statement and Reconnaissance Survey* (2012), other Mission Revival buildings in Monterey are better exemplars of the style and that retain a higher degree of integrity, such as 408 Alvarado Street (Monterey Hotel) and 417 Alvarado Street (Golden State Theater).

The PG&E Monterey Substation, as well as the carport, perimeter wall and wall bordering the electrical equipment, are also not significant under Criterion 3. Nothing about the design or construction of these features are unique or required groundbreaking or innovative features to surmount engineering or design challenges. They are mundane resources that have typical construction techniques, materials, and arrangements, and do not possess any type of architectural significance.

Overall, the resources on the property are generally common types, and do not possess high artistic value. Research also did not uncover any information to suggest that the complex represents the work of a master.

Criterion 4

498 Del Monte Avenue and the PG&E Monterey Substation and do not appear to have the potential to yield more information about prehistory or history, and, therefore, do not appear eligible for listing under Criterion 4. As-builts and historic plans are available for 498 Del Monte Avenue, and the design and layout of the other facilities reflect common designs, materials, methods of construction for electrical substations. Therefore, there is no potential to yield more information on the design and construction of 498 Del Monte Avenue and the PG&E Monterey Substation and that is not already known.

Integrity Analysis

Aside from meeting one of the CRHR criteria, a resource must also retain a significant amount of its historic integrity to be eligible for listing in the CRHR. Integrity is the authenticity of an historical resource's physical identity *evidenced by the survival of characteristics that existed during the resource's period of significance.* To be eligible for listing, a resource must retain enough of its historic character of appearance to be recognizable as an historical resource and to convey the reasons for its significance. Historic integrity is comprised of seven aspects: location, design, setting, materials, workmanship, feeling, and association.

As mentioned, changes to 498 Del Monte Avenue include the infill of a rose window that was centered in the parapet on the primary elevation (Attachment A, Figures 14 and 15), removal of decorative metal sconces that flanked the entrance on the primary elevation (Attachment A, Figures 14 and 15), and infill of the six electrical openings on the southern elevation (Attachment A, Figures 3, 12, and 13). Although the building retains sufficient physical features to convey its character, these changes have diminished its integrity of design, materials, workmanship, and feeling. Scoring resembling voussoirs over the primary entrance have been obfuscated by layers of paint, thus also affecting the building's integrity of design and workmanship. The building retained its original location, but its setting has been substantially altered through the removal of the former MGP/SEP resources, such as the large gas holders and crude oil and water tanks that are highly visible in historic aerials. Construction of the Monterey Sports Center in 1990 as well as the walls enclosing the parcel and bordering the electrical equipment in the 1960s also have

diminished the building's integrity of setting. 498 Del Monte Avenue still is used as part of an electrical substation; however, it is no longer recognizable as part of a former MGP/SEP complex, and, therefore, its integrity of association also has been compromised. Additionally, infill of the six original electrical openings on the building's southern wall and the removal of the four transformers from the building's interior detract from its association as an early twentieth-century substation.

The PG&E Monterey Substation as a whole appears to retain overall integrity and has been relatively unaltered, since it was constructed. The property as a whole, comprised of the carport, control house at 498 Del Monte Avenue, electrical equipment, and walls enclosing the site and surrounding the electrical equipment to the north, east, and south, retains its integrity of location, design, materials, workmanship, feeling, and association. Its essential features from its period of construction are intact, and the facility would easily be recognizable to persons from the past. The Monterey Substation's integrity of setting has been affected by the construction of the Monterey Sports Complex immediately west of the complex, but its setting otherwise has not changed and remains surrounded by parking lots to the north, commercial buildings to the east, and a baseball field to the south.

Therefore, while 498 Del Monte Avenue and the PG&E Monterey Substation do not meet the CRHR or City of Monterey criteria for eligibility, they do retain some aspects of their historic integrity.

5. Compatibility with the Secretary of the Interior's Standards

The following assesses the project's compatibility with the SOIS, specifically the Standards for Rehabilitation, as detailed in 36 CFR Part 68. The Standards for Rehabilitation acknowledge the need to alter a historic property to meet new uses or needs through compatible changes to the property, while also retaining the building's historic character. The SOIS can be used for any property type or use, and are not limited to ones that are considered historically significant. The Standards for Rehabilitation consist of the following:

- **Standard 1:** A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
- **Standard 2:** The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
- **Standard 3:** Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
- **Standard 5:** Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
- **Standard 7:** Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
- **Standard 9:** New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old

and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

- **Standard 10:** New additions and adjacent or related new construction shall be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The project improvements consist of the following:

- Widening the existing gate and driveway north of the e intersection at Figueroa and East Franklin streets and construction of a new access gate and driveway along Figueroa Street. These improvements will require removal of portions of the perimeter wall for construction of the new access gate.
- Widening the existing opening in the southern interior wall to the west of the electrical equipment.
- Removal of the existing interior wall to the north of the electrical equipment and construction of a new wall approximately 30 feet to the north. It is also possible that the existing interior wall may be re-used and relocated, instead of constructing a new one. The interior wall will connect to the perimeter wall.
- Demolition of the carport located in the northwestern corner of the parcel.

The following provides additional information on how the project improvements conform to the SOIS through the following applicable Standards for Rehabilitation:

- **Standard 1: A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.** The property has retained its historic use and character as a power-related property, with the oldest extant portion of the property being 498 Del Monte Avenue from 1926. The modifications to the perimeter wall, removal of the carport, and reconstruction or relocation of the existing wall north of the electrical equipment would not change the property's historic purpose. These changes would not cause further diminishment of the property's historic integrity of design, materials, workmanship, and feeling, specifically as it relates to the 1926 building.
- **Standard 2: The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.** While the project would remove the carport constructed between 1949 and 1956, and remove portions of the wall constructed between 1962 and 1967, these would not be considered materials and features that characterize the property. The 1926 building would remain unaltered and would still be the main building that characterizes the property.
- **Standard 3: Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.** The removal of the carport, improvements to the perimeter wall, and reconstruction of a new wall or relocation of the existing northern interior wall will not create a false sense of historic development. The new features would be clearly distinguishable as modern features and do not impinge upon the property's sense of time, place, and use, especially for the portion of the property from 1926.

- **Standard 5: Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.** The removal of the carport, improvements to the perimeter wall, and reconstruction of a new wall or relocation of the existing northern interior wall will not affect the craftsmanship, workmanship, feeling, or materials of the historic property. The property will retain sufficient physical evidence from its extant periods of development, particularly for 498 Del Monte Avenue which is the oldest building on site and would not be altered.

- **Standard 9: New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.** The project proposes to remove the existing interior wall to the north of the electrical equipment and replace it with a new wall approximately 30 feet to the north. The existing interior northern wall may also be re-used in this location. The wall will terminate at the existing perimeter wall. If a new wall is used, the new northern interior wall will be of a similar height, scale, materials, and design, since it will feature a clay-tile pent roof skirting its roofline, a stucco exterior, and a rhythmic pattern of blind arches. Because the blind arches will be slightly off-set from the arches on the existing portion of the wall, this extended wall would be compatible with the original yet distinguishable as an alteration. Also, the openings that will be added to the existing wall will not completely destroy any older materials and will be consistent to property's scale, character, materials, and feeling.
- **Standard 10: New additions and adjacent or related new construction shall be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.** The removal of the carport, improvements to the perimeter wall, and reconstruction of a new wall or relocation of the existing northern interior wall would not cause impacts to the property's overall context, appearance, and feeling. These alterations would not impact the property's essential form and integrity, and its oldest element, the building at 498 Del Monte Avenue, would remain intact and unaltered.

In conclusion, the improvements would be considered consistent with the SOIS and Standards for Rehabilitation, since the property's key features, arrangements, form, and character would not be altered, and the changes would be compatible with its historic uses and function as a power-related building with extant elements from as early 1926.

6. Results

Based on site investigations and historic research, this study recommends the building at 498 Del Monte Avenue and the PG&E Monterey Substation as not eligible for listing in the CRHR or considered a historical resource in accordance with the City of Monterey Criteria for Historic Zoning. Additionally, the improvements planned to the property are consistent with the SOIS.

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ATTACHMENT A

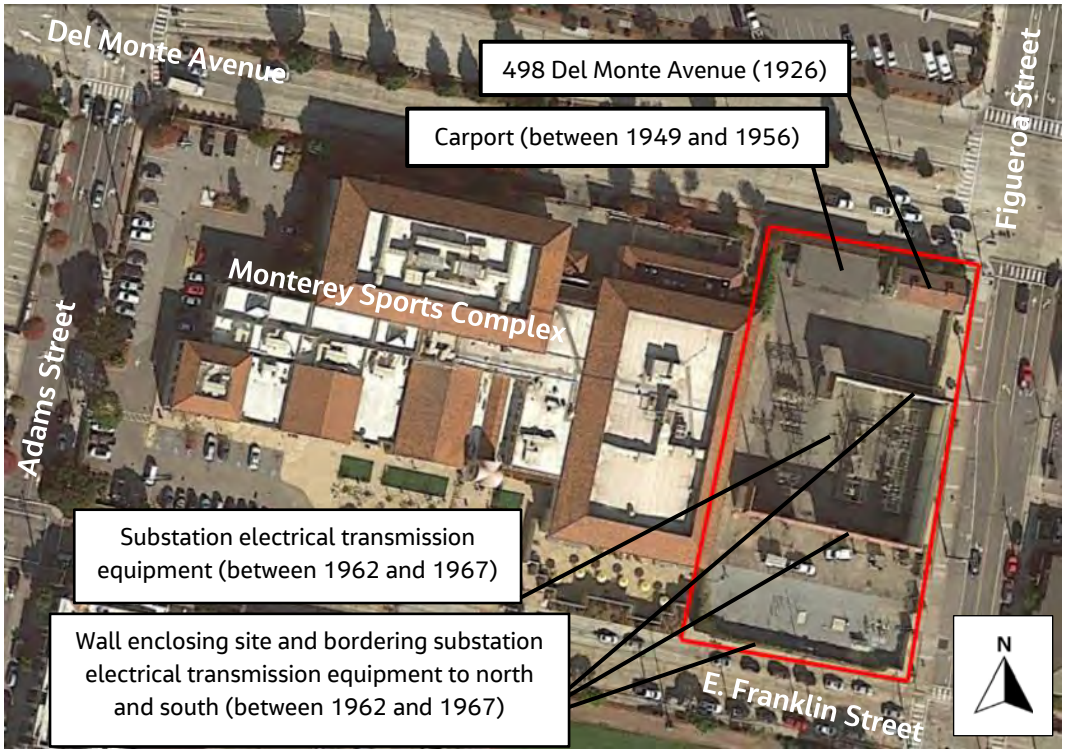


Figure 1. Not to scale. Red line denotes parcel boundary. Construction dates of resources presented in parenthesis.

Figure 2. Eastern (primary) elevation of 498 Del Monte Avenue, which was built in 1926. Notice the wall that abuts the building to the left. View looking west-southwest from intersection of Del Monte Avenue and Figueroa Street.

Figure 3. Western and southern elevations of 498 Del Monte Avenue, which was built in 1926. Notice the walls that abut the building at the right and left. View looking northeast

Figure 4. Carport built sometime between 1949 and 1956. The resource will be demolished as part of the project. Southern elevation of 498 Del Monte Avenue is visible to the right. View looking east-northeast.

Figure 5. Substation electrical transmission equipment, installed sometime between 1962 and 1967. The tall wall that encloses the substation to the east is in the background. View looking southeast.

Figure 6. Photograph showing the walls that border the electrical transmission equipment to the north (at left) and south (at right). The northern wall will be removed and a new wall will be constructed or the existing wall will be relocated approximately 30 feet to the north as part of the proposed project. The northern wall will also connect to the perimeter wall. PG&E additionally proposes to widen an entrance opening in the southerm wall. View looking southeast.

Figure 7. Photograph depicting the eastern wall that encloses the parcel at center; a portion of this wall will be removed for the installation of a new gate (denoted by red arrow). 498 Del Monte Avenue is at right, and the tall walls that border the substation electrical transmission equipment to the north (at center) and east (at left) also are visible. View looking west-southwest from Figueroa Street.

Figure 8. View of wall that encloses parcel (in foreground). The gate that will be enlarged as part of the proposed project is denoted with a red arrow. The tall walls that border the substation electrical transmission equipment to the east (at right) and south (at center) as well as a portion of the Monterey Sports Complex (at left) also are visible. View looking northeast from the intersection of Figueroa and East Franklin streets.

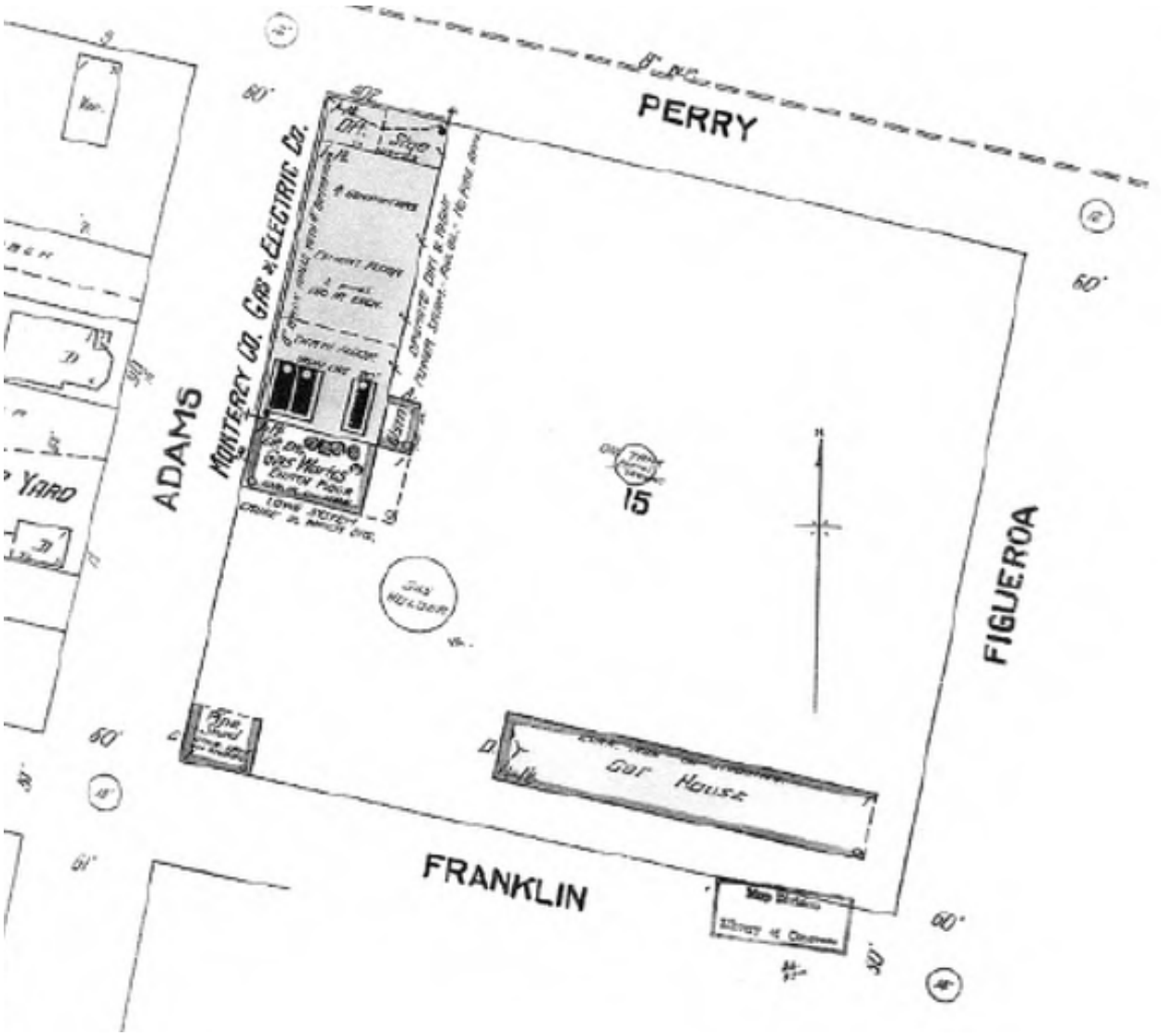


Figure 9. Excerpt from 1905 Sanborn Fire Insurance map showing the Monterey Gas and Electric Company MGP and SEP at the intersection of Perry Street (presently is known as Del Monte Avenue) and Adams Street, as well as other associated resources.

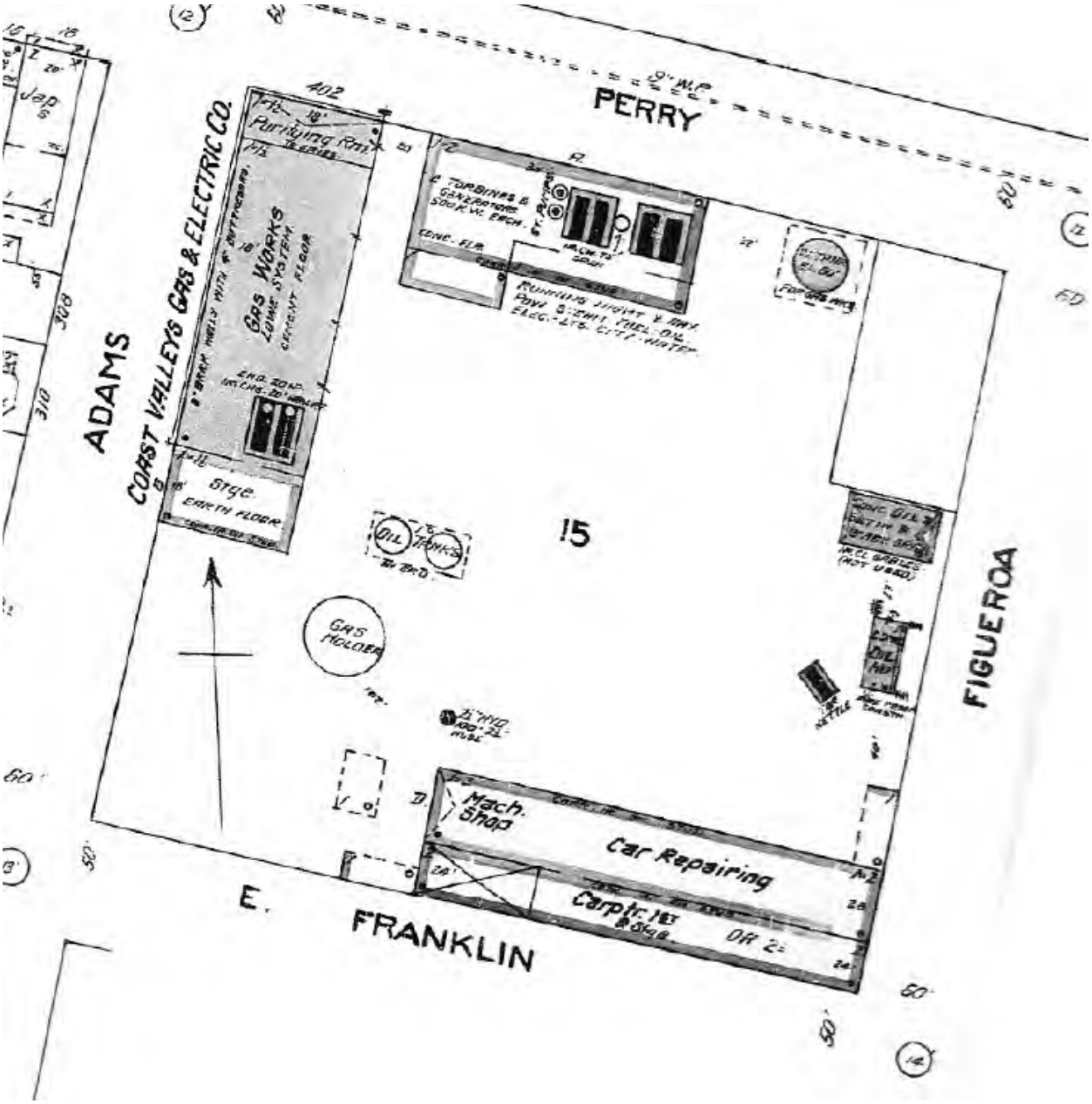


Figure 10. Excerpt from 1912 Sanborn Fire Insurance map showing the Coast Valleys Gas and Electric Company Monterey MGP (at the intersection of present-day Del Monte Avenue and Adams Street) and SEP (along present-day Del Monte Avenue).

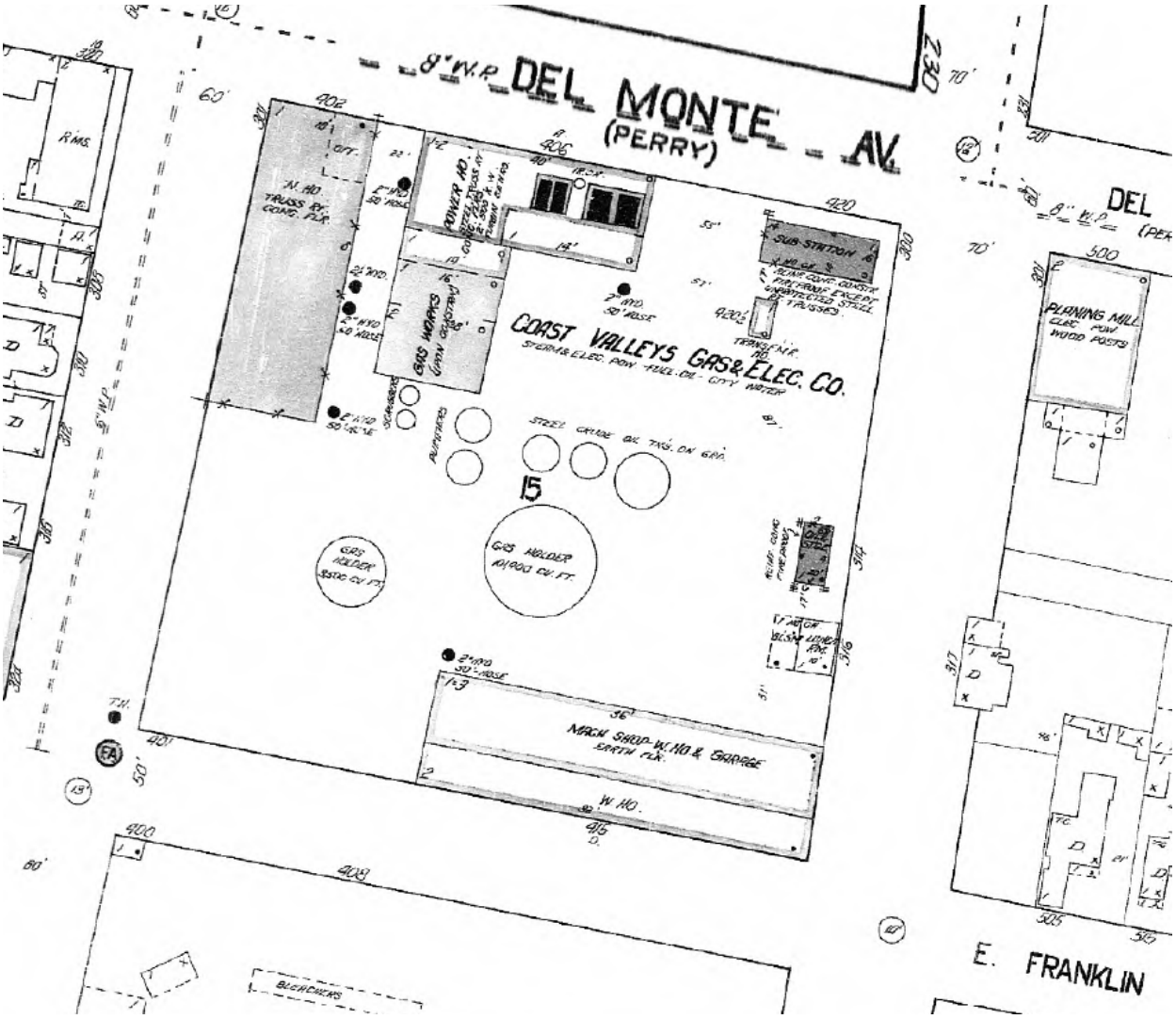


Figure 11. Excerpt from 1926 Sanborn Fire Insurance map showing the Coast Valley Gas and Electric Company Monterey SEP/MGP along Del Monte Avenue. The building at the corner of Del Monte Avenue and Adams Street that was used as the MGP in the 1912 Sanborn is shown as a warehouse in the 1926 map. The extant building at 498 Del Monte Avenue occupies a rectangular footprint at the corner of Del Monte Avenue and Figueroa Street.

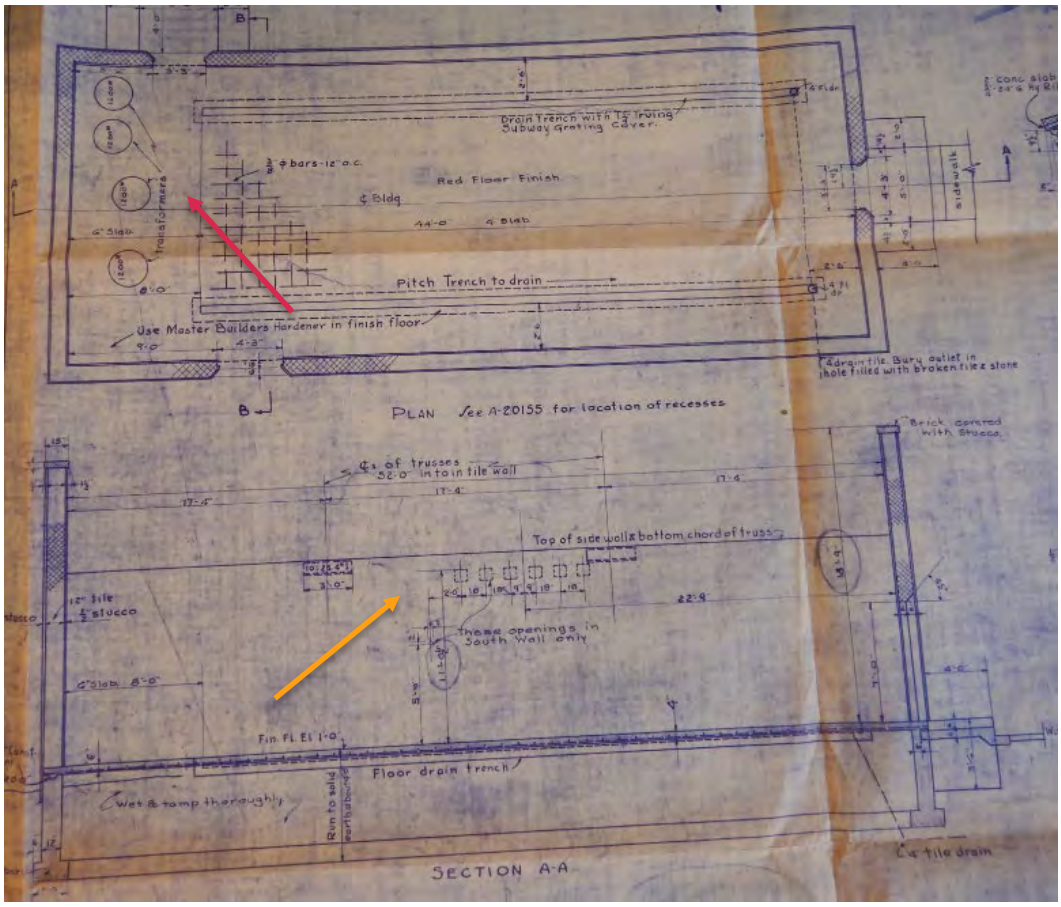


Figure 12. 1926 as-builts for the former substation at 498 Del Monte Avenue, showing the four transformers housed at the building (denoted by red arrow) and six electrical openings in the building's southern wall (denoted by yellow arrow).

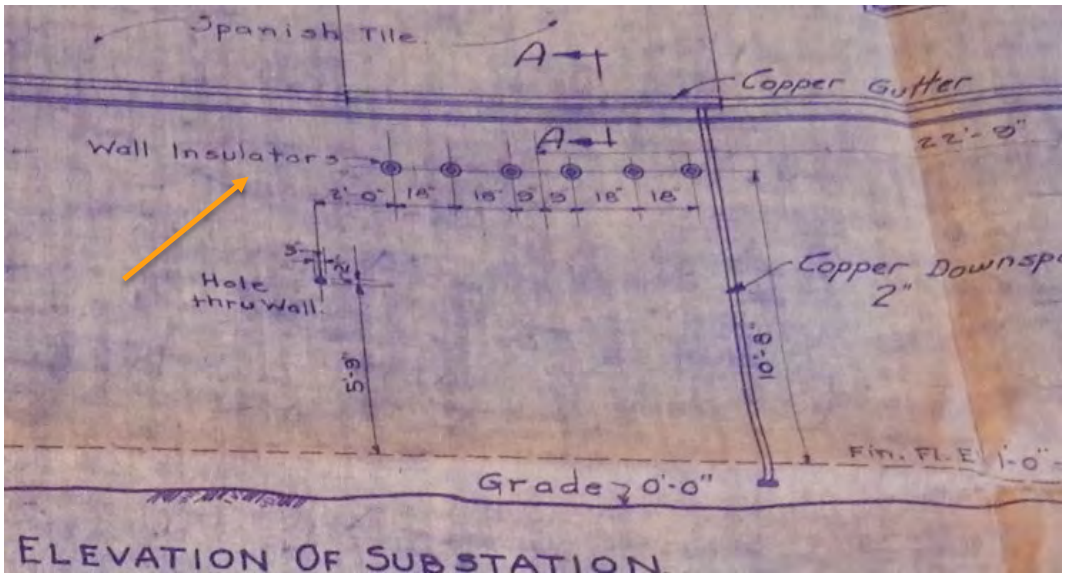


Figure 13. Excerpt from 1926 as-builts for the former substation at 498 Del Monte Avenue showing the wall insulators on the building's southern elevation (denoted by yellow arrow).

Figure 14. Excerpt from 1926 as-builts depicting the eastern (primary) elevation of the former substation at 498 Del Monte Avenue. The rose window has been infilled, and the sconces flanking the door have been removed. Based on inspection of an aerial from 1929 (Figure 15), the decorative planters on either side of the doorway in the as-builts never were installed.

Figure 15. Excerpt from 1929 photograph depicting the primary (eastern) and secondary (northern) elevations of the former substation at 498 Del Monte Avenue.

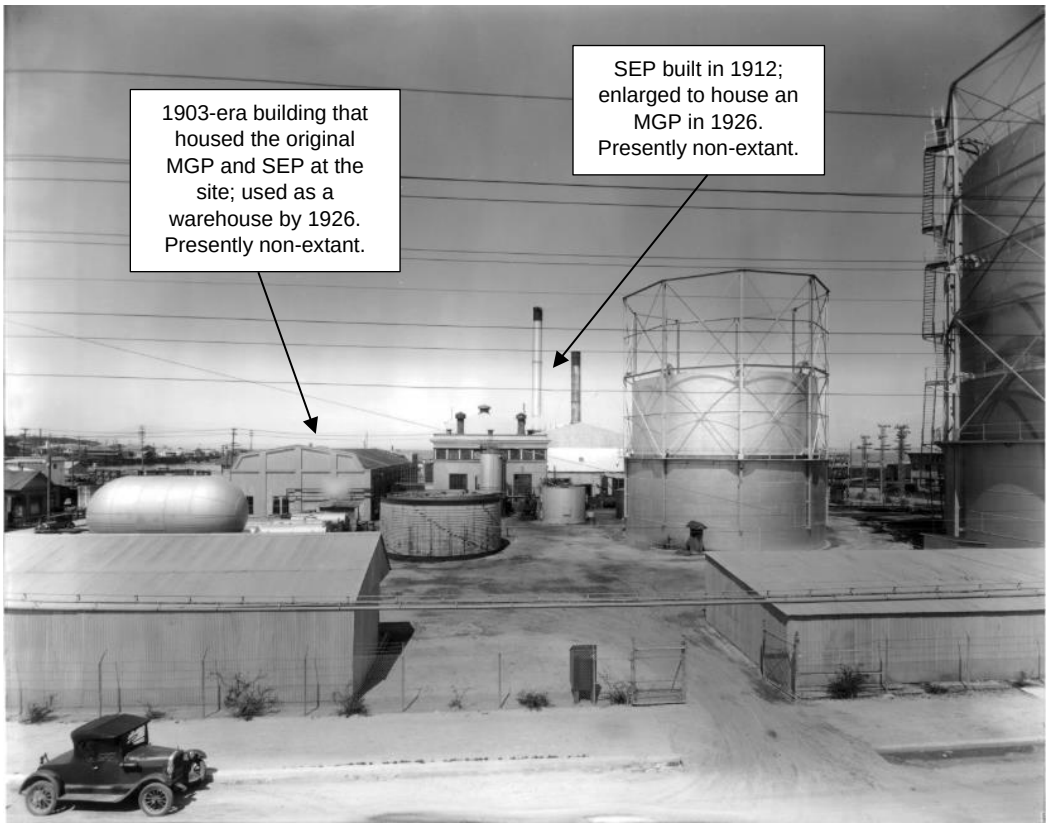


Figure 16. Circa 1929 photograph showing the Monterey MGP and SEP, which at that time were owned by PG&E. View looking north from the intersection of East Franklin and Adams streets.

Figure 17. Circa 1929 photograph showing the Monterey MGP and SEP, which at that time were owned by PG&E. View looking south from near the intersection of Del Monte Avenue and Figueroa Street.

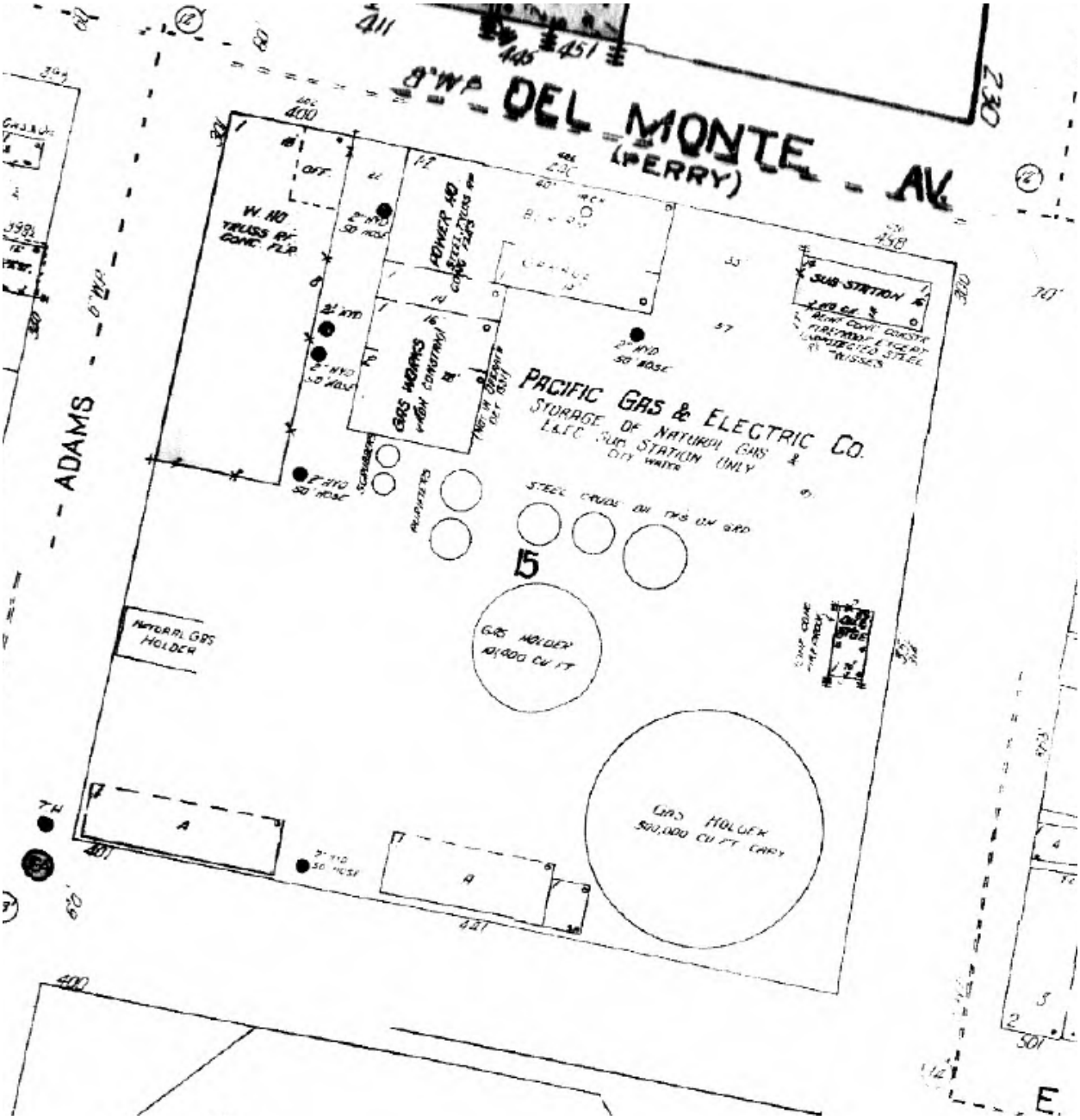


Figure 18. Excerpt from 1943 Sanborn Fire Insurance map. PG&E constructed the large gas holder in the southeastern corner of the property.

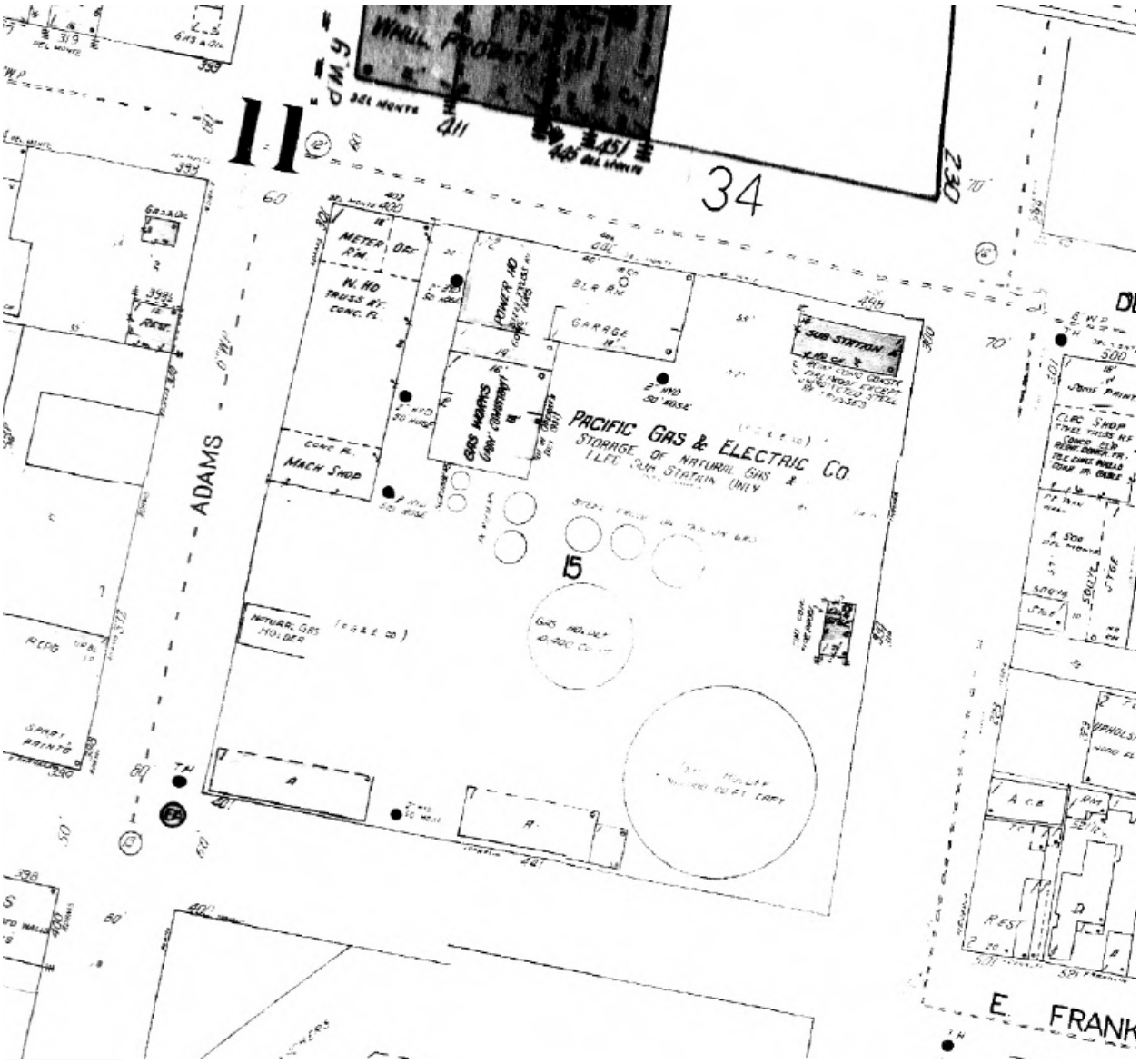


Figure 19. Excerpt from 1949 Sanborn Fire Insurance map.

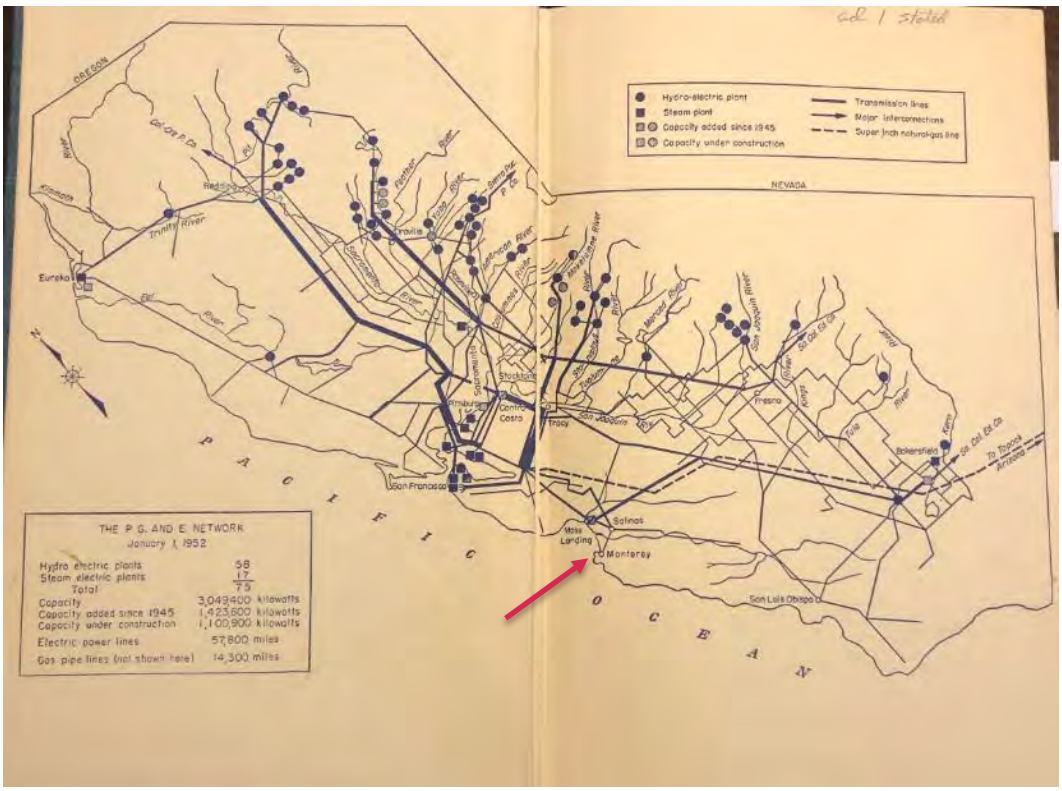


Figure 20. Map excerpted from *P.G. and E. of California: the Centennial Story of Pacific Gas and Electric Company 1852 -1952* that does not include the PG&E Monterey SEP, therefore indicating that the plant had ceased operations by this time (Monterey denoted by red arrow).

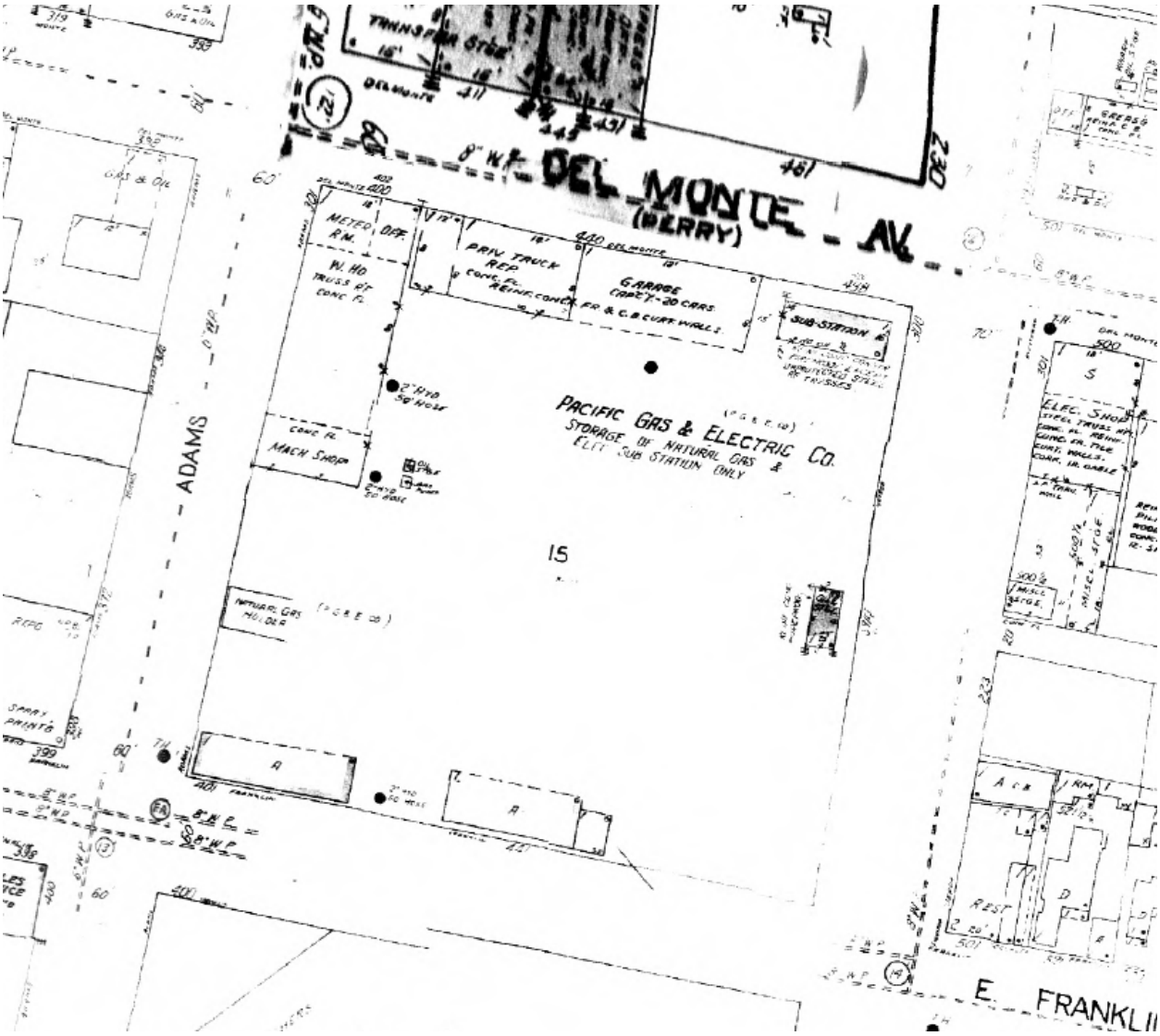


Figure 21. Excerpt from 1956 Sanborn Fire Insurance map.

Figure 22. Excerpt from 1962 Sanborn Fire Insurance map.

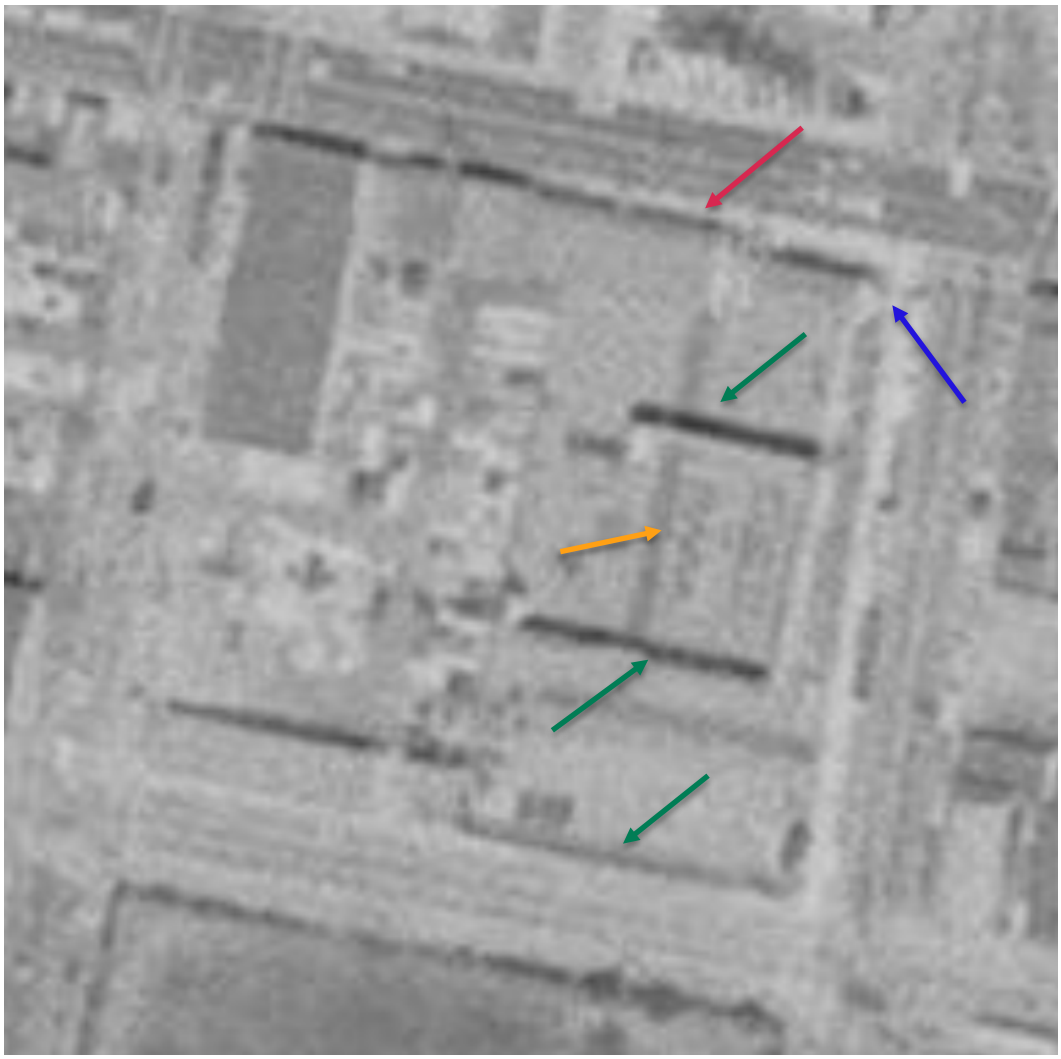


Figure 23. 1968 aerial showing the current configuration of resources at the site. This includes a garage (red arrow), the building at 498 Del Monte Avenue (blue arrow), and substation electrical transmission equipment (yellow arrow), all of which are presently extant. The image also shows the walls that enclose the parcel and those that border the substation electrical transmission equipment to the north and south (green arrows); the walls also are presently extant.

find the PG&E substation in this picture

Our Monterey Substation doesn't look like it houses switches, transformers and other heavy duty electrical equipment.

But it does look like the Mission architecture of old Monterey. And that's the idea.

We've just remodeled this substation as part of our "Beautility" program – to blend our architecture with the historic beauty of the community. "Beautility" is our word to you that when we build or remodel, we want to be attractive as well as useful.

PG and E

Figure 24. Advertisement for the PG&E Monterey Substation appearing in *The Californian* on September 5, 1967, indicating that the site was used as a substation by this time.

ATTACHMENT C

PG&E Monterey

Monterey County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	0.00	1000sqft	0.91	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	3.6	**Precipitation Freq (Days)**	55
Climate Zone	4			**Operational Year**	2022
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - lot acreage defined by project description

Construction Phase - project dates specified by project description

Off-road Equipment - equipment type and utlization provided by project team. assumes a 10-hr working day

Off-road Equipment - no equipment is on site during the first month

Trips and VMT - hauling trips and length specified by project description

Grading - no material export/import during the first month

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	2.00	80.00
tblConstructionPhase	NumDays	1.00	21.00
tblFleetMix	HHD	0.03	0.00
tblFleetMix	LDA	0.54	0.00
tblFleetMix	LDT1	0.03	0.00
tblFleetMix	LDT2	0.21	0.00
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	5.5040e-003	0.00
tblFleetMix	MCY	7.7240e-003	0.00
tblFleetMix	MDV	0.13	0.00
tblFleetMix	MH	8.0500e-004	0.00
tblFleetMix	MHD	0.02	0.00
tblFleetMix	OBUS	4.1550e-003	0.00
tblFleetMix	SBUS	1.2360e-003	0.00
tblFleetMix	UBUS	2.7380e-003	0.00
tblLandUse	LotAcreage	0.00	0.91
tblOffRoadEquipment	HorsePower	158.00	81.00
tblOffRoadEquipment	HorsePower	203.00	247.00
tblOffRoadEquipment	HorsePower	65.00	97.00
tblOffRoadEquipment	LoadFactor	0.38	0.73
tblOffRoadEquipment	LoadFactor	0.36	0.40
tblTripsAndVMT	HaulingTripLength	20.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	1,400.00
tblTripsAndVMT	WorkerTripNumber	20.00	10.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1076	1.4932	0.8717	4.1200e-003	0.0624	0.0391	0.1015	0.0171	0.0368	0.0539	0.0000	381.7002	381.7002	0.0432	0.0000	382.7796
Maximum	**0.1076**	**1.4932**	**0.8717**	**4.1200e-003**	**0.0624**	**0.0391**	**0.1015**	**0.0171**	**0.0368**	**0.0539**	**0.0000**	**381.7002**	**381.7002**	**0.0432**	**0.0000**	**382.7796**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1076	1.4932	0.8717	4.1200e-003	0.0624	0.0391	0.1015	0.0171	0.0368	0.0539	0.0000	381.7001	381.7001	0.0432	0.0000	382.7794
Maximum	**0.1076**	**1.4932**	**0.8717**	**4.1200e-003**	**0.0624**	**0.0391**	**0.1015**	**0.0171**	**0.0368**	**0.0539**	**0.0000**	**381.7001**	**381.7001**	**0.0432**	**0.0000**	**382.7794**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2021	3-31-2021	0.8475	0.8475
2	4-1-2021	6-30-2021	0.7179	0.7179
		Highest	0.8475	0.8475

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Sampling And Mob	Site Preparation	1/1/2021	1/31/2021	5	21	
2	Excavating and Backfill	Grading	2/1/2021	5/21/2021	5	80	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Excavating and Backfill	Concrete/Industrial Saws	1	0.50	81	0.73
Excavating and Backfill	Excavators	1	8.00	81	0.73
Excavating and Backfill	Generator Sets	1	10.00	84	0.74
Excavating and Backfill	Off-Highway Trucks	1	10.00	402	0.38
Excavating and Backfill	Other General Industrial Equipment	1	5.00	88	0.34
Excavating and Backfill	Plate Compactors	1	8.00	8	0.43
Excavating and Backfill	Rubber Tired Loaders	1	6.00	247	0.40
Excavating and Backfill	Skid Steer Loaders	1	5.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Sampling And Mob	0		0.00	0.00	10.80	7.30				
Excavating and Backfill	8	10.00	0.00	1,400.00	10.80	7.30	100.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Sampling And Mob - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total					**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total					**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.2 Sampling And Mob - 2021

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total					**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total					**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.3 Excavating and Backfill - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0843	0.8012	0.6938	1.6200e-003		0.0357	0.0357		0.0336	0.0336	0.0000	141.2205	141.2205	0.0373	0.0000	142.1541
Total	**0.0843**	**0.8012**	**0.6938**	**1.6200e-003**	**0.0000**	**0.0357**	**0.0357**	**0.0000**	**0.0336**	**0.0336**	**0.0000**	**141.2205**	**141.2205**	**0.0373**	**0.0000**	**142.1541**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0217	0.6906	0.1647	2.4700e-003	0.0593	3.3400e-003	0.0626	0.0163	3.2000e-003	0.0195	0.0000	237.5577	237.5577	5.7100e-003	0.0000	237.7006
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6100e-003	1.4500e-003	0.0132	3.0000e-005	3.1800e-003	3.0000e-005	3.2100e-003	8.5000e-004	3.0000e-005	8.7000e-004	0.0000	2.9221	2.9221	1.2000e-004	0.0000	2.9250
Total	**0.0233**	**0.6921**	**0.1779**	**2.5000e-003**	**0.0624**	**3.3700e-003**	**0.0658**	**0.0171**	**3.2300e-003**	**0.0203**	**0.0000**	**240.4798**	**240.4798**	**5.8300e-003**	**0.0000**	**240.6255**

3.3 Excavating and Backfill - 2021

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0843	0.8012	0.6938	1.6200e-003		0.0357	0.0357		0.0336	0.0336	0.0000	141.2203	141.2203	0.0373	0.0000	142.1539
Total	**0.0843**	**0.8012**	**0.6938**	**1.6200e-003**	**0.0000**	**0.0357**	**0.0357**	**0.0000**	**0.0336**	**0.0336**	**0.0000**	**141.2203**	**141.2203**	**0.0373**	**0.0000**	**142.1539**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0217	0.6906	0.1647	2.4700e-003	0.0593	3.3400e-003	0.0626	0.0163	3.2000e-003	0.0195	0.0000	237.5577	237.5577	5.7100e-003	0.0000	237.7006
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6100e-003	1.4500e-003	0.0132	3.0000e-005	3.1800e-003	3.0000e-005	3.2100e-003	8.5000e-004	3.0000e-005	8.7000e-004	0.0000	2.9221	2.9221	1.2000e-004	0.0000	2.9250
Total	**0.0233**	**0.6921**	**0.1779**	**2.5000e-003**	**0.0624**	**3.3700e-003**	**0.0658**	**0.0171**	**3.2300e-003**	**0.0203**	**0.0000**	**240.4798**	**240.4798**	**5.8300e-003**	**0.0000**	**240.6255**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Light Industry	9.50	7.30	7.30	59.00	28.00	13.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Light Industry	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Light Industry	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Light Industry	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Light Industry	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Light Industry	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Light Industry	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

PG&E Monterey

Monterey County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	0.00	1000sqft	0.91	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	3.6	**Precipitation Freq (Days)**	55
Climate Zone	4			**Operational Year**	2022
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - lot acreage defined by project description

Construction Phase - project dates specified by project description

Off-road Equipment - equipment type and utlization provided by project team. assumes a 10-hr working day

Off-road Equipment - no equipment is on site during the first month

Trips and VMT - hauling trips and length specified by project description

Grading - no material export/import during the first month

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	2.00	80.00
tblConstructionPhase	NumDays	1.00	21.00
tblFleetMix	HHD	0.03	0.00
tblFleetMix	LDA	0.54	0.00
tblFleetMix	LDT1	0.03	0.00
tblFleetMix	LDT2	0.21	0.00
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	5.5040e-003	0.00
tblFleetMix	MCY	7.7240e-003	0.00
tblFleetMix	MDV	0.13	0.00
tblFleetMix	MH	8.0500e-004	0.00
tblFleetMix	MHD	0.02	0.00
tblFleetMix	OBUS	4.1550e-003	0.00
tblFleetMix	SBUS	1.2360e-003	0.00
tblFleetMix	UBUS	2.7380e-003	0.00
tblLandUse	LotAcreage	0.00	0.91
tblOffRoadEquipment	HorsePower	158.00	81.00
tblOffRoadEquipment	HorsePower	203.00	247.00
tblOffRoadEquipment	HorsePower	65.00	97.00
tblOffRoadEquipment	LoadFactor	0.38	0.73
tblOffRoadEquipment	LoadFactor	0.36	0.40
tblTripsAndVMT	HaulingTripLength	20.00	100.00
tblTripsAndVMT	HaulingTripNumber	0.00	1,400.00
tblTripsAndVMT	WorkerTripNumber	20.00	10.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	2.6949	37.5271	21.8227	0.1029	1.6073	0.9767	2.5839	0.4394	0.9200	1.3595	0.0000	10,501.0432	10,501.0432	1.1917	0.0000	10,530.8354
Maximum	**2.6949**	**37.5271**	**21.8227**	**0.1029**	**1.6073**	**0.9767**	**2.5839**	**0.4394**	**0.9200**	**1.3595**	**0.0000**	**10,501.0432**	**10,501.0432**	**1.1917**	**0.0000**	**10,530.8354**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	2.6949	37.5271	21.8227	0.1029	1.6073	0.9767	2.5839	0.4394	0.9200	1.3595	0.0000	10,501.0432	10,501.0432	1.1917	0.0000	10,530.8354
Maximum	**2.6949**	**37.5271**	**21.8227**	**0.1029**	**1.6073**	**0.9767**	**2.5839**	**0.4394**	**0.9200**	**1.3595**	**0.0000**	**10,501.0432**	**10,501.0432**	**1.1917**	**0.0000**	**10,530.8354**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Sampling And Mob	Site Preparation	1/1/2021	1/31/2021	5	21	
2	Excavating and Backfill	Grading	2/1/2021	5/21/2021	5	80	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Excavating and Backfill	Concrete/Industrial Saws	1	0.50	81	0.73
Excavating and Backfill	Excavators	1	8.00	81	0.73
Excavating and Backfill	Generator Sets	1	10.00	84	0.74
Excavating and Backfill	Off-Highway Trucks	1	10.00	402	0.38
Excavating and Backfill	Other General Industrial Equipment	1	5.00	88	0.34
Excavating and Backfill	Plate Compactors	1	8.00	8	0.43
Excavating and Backfill	Rubber Tired Loaders	1	6.00	247	0.40
Excavating and Backfill	Skid Steer Loaders	1	5.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Sampling And Mob	0		0.00	0.00	10.80	7.30				
Excavating and Backfill	8	10.00	0.00	1,400.00	10.80	7.30	100.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Sampling And Mob - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Total					**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**			**0.0000**			**0.0000**

3.2 Sampling And Mob - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Vendor					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Worker					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Total					**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**			**0.0000**			**0.0000**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Total					**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**			**0.0000**			**0.0000**

3.2 Sampling And Mob - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Vendor					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Worker					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Total					**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**			**0.0000**			**0.0000**

3.3 Excavating and Backfill - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	2.1064	20.0290	17.3441	0.0405		0.8922	0.8922		0.8393	0.8393		3,891.7232	3,891.7232	1.0291		3,917.4514
Total	**2.1064**	**20.0290**	**17.3441**	**0.0405**	**0.0000**	**0.8922**	**0.8922**	**0.0000**	**0.8393**	**0.8393**		**3,891.7232**	**3,891.7232**	**1.0291**		**3,917.4514**

3.3 Excavating and Backfill - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.5441	17.4582	4.1354	0.0616	1.5251	0.0838	1.6089	0.4176	0.0801	0.4978		6,529.2625	6,529.2625	0.1594		6,533.2465
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0443	0.0400	0.3432	8.0000e-004	0.0822	6.9000e-004	0.0828	0.0218	6.3000e-004	0.0224		80.0575	80.0575	3.2000e-003		80.1375
Total	**0.5884**	**17.4981**	**4.4786**	**0.0624**	**1.6073**	**0.0845**	**1.6917**	**0.4394**	**0.0808**	**0.5202**		**6,609.3200**	**6,609.3200**	**0.1626**		**6,613.3841**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	2.1064	20.0290	17.3441	0.0405		0.8922	0.8922		0.8393	0.8393	0.0000	3,891.7232	3,891.7232	1.0291		3,917.4514
Total	**2.1064**	**20.0290**	**17.3441**	**0.0405**	**0.0000**	**0.8922**	**0.8922**	**0.0000**	**0.8393**	**0.8393**	**0.0000**	**3,891.7232**	**3,891.7232**	**1.0291**		**3,917.4514**

3.3 Excavating and Backfill - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.5441	17.4582	4.1354	0.0616	1.5251	0.0838	1.6089	0.4176	0.0801	0.4978		6,529.2625	6,529.2625	0.1594		6,533.2465
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0443	0.0400	0.3432	8.0000e-004	0.0822	6.9000e-004	0.0828	0.0218	6.3000e-004	0.0224		80.0575	80.0575	3.2000e-003		80.1375
Total	**0.5884**	**17.4981**	**4.4786**	**0.0624**	**1.6073**	**0.0845**	**1.6917**	**0.4394**	**0.0808**	**0.5202**		**6,609.3200**	**6,609.3200**	**0.1626**		**6,613.3841**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Light Industry	9.50	7.30	7.30	59.00	28.00	13.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**		**0.0000**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

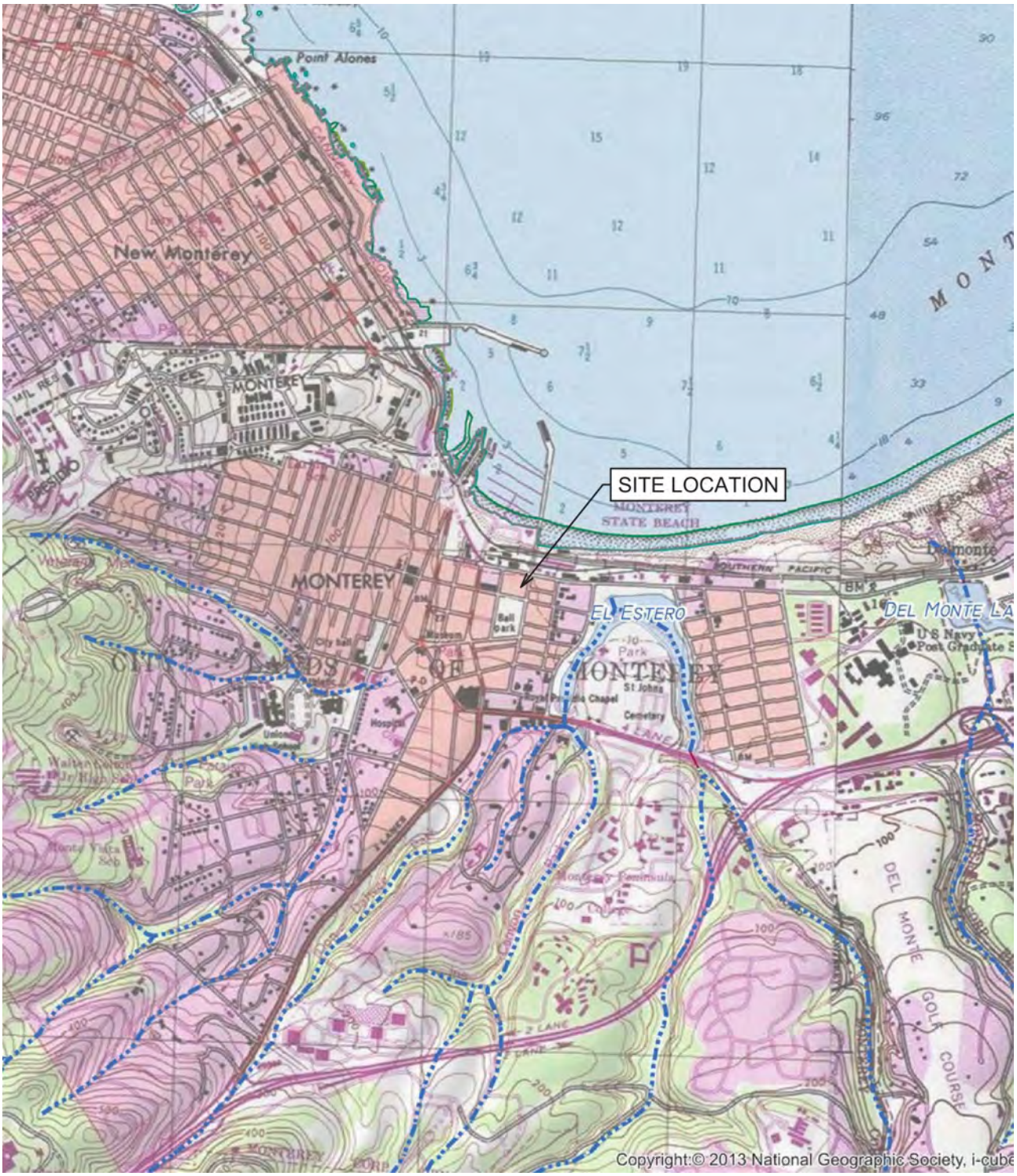
Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Figures



SCALE 1: 20,000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

N

Figure 1

Site Location Map

Former Monterey - 1 MGP Site
498 Del Monte Avenue
Monterey, California

Environmental Resources Management
www.erm.com

ERM

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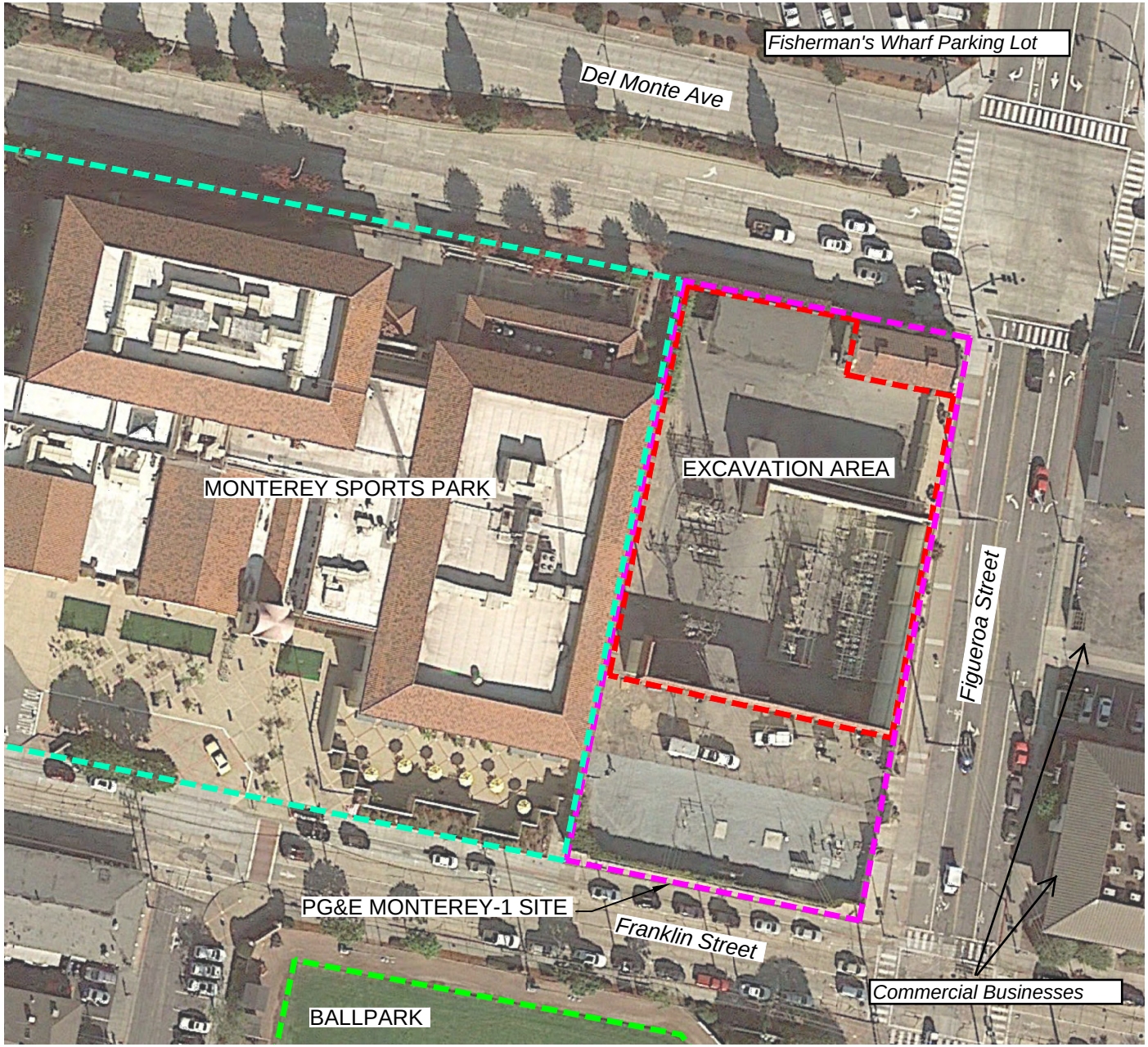

LEGEND

- Excavation Area
- Eastern Parcel, Current PG&E Property
- Western Parcel, Portion of the Former MGP

N

0 40 80

FEET

Figure 2

Site Plan

Former Monterey - 1 MGP Site

498 Del Monte Avenue

Monterey, California

Environmental Resources Management
www.erm.com
ERM

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Control Building (to be excluded from excavation area) and interior of eastern perimeter wall where driveway to be constructed, view from southwest

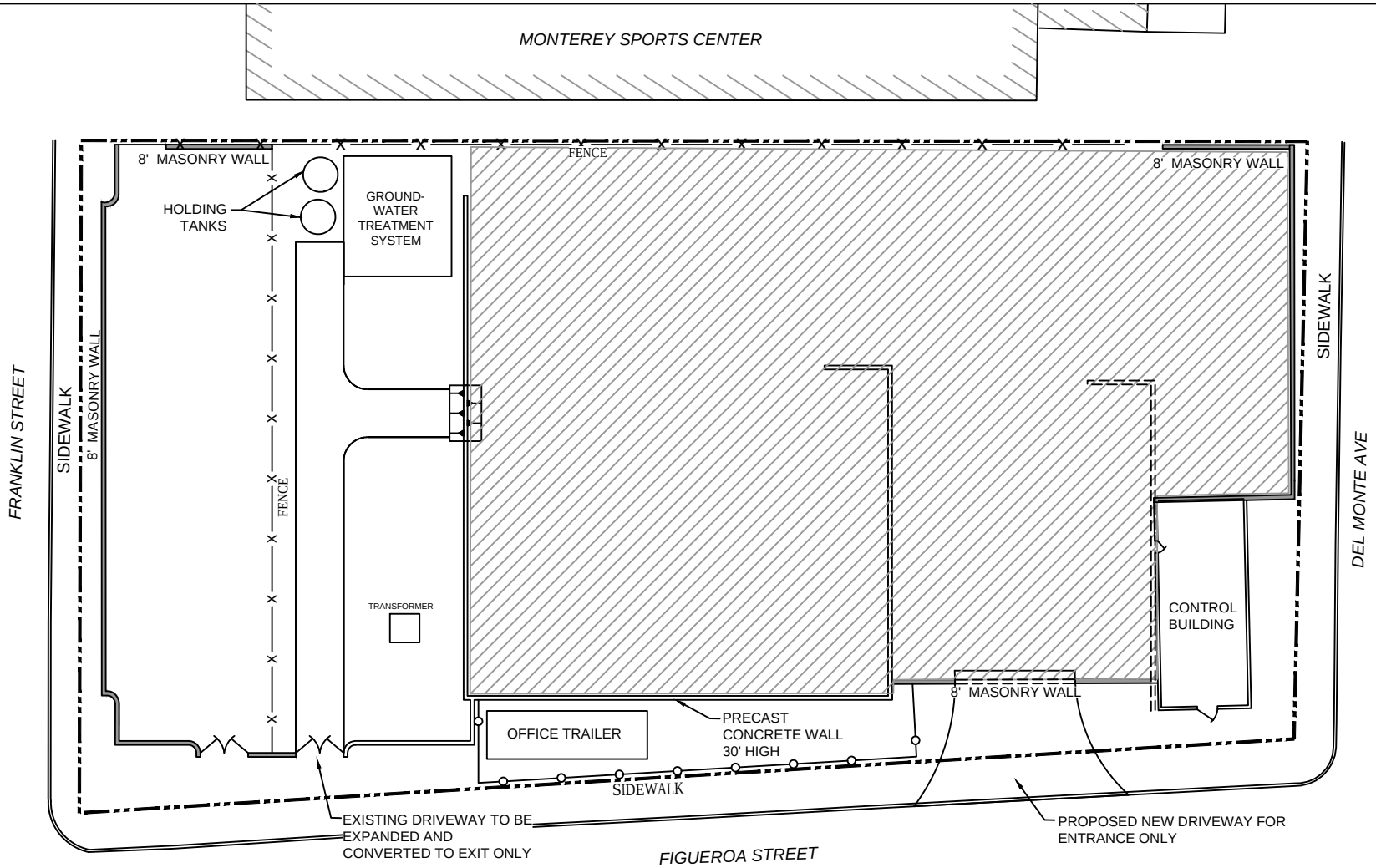
View of Project Site within perimeter walls, showing portion of excavation area (electrical equipment to be removed by PG&E), view to south

Eastern perimeter walls of Project Site on Figueroa Street, view to south towards East Franklin Street (driveway to be constructed beyond planter box in foreground)

Northern perimeter wall of Project Site on Del Monte Avenue, view to east towards Figueroa Street. Photograph source: Google Earth. 2020. *Street View: Del Monte Avenue, Monterey CA 93940.* Accessed on 4-3-2020

Figure 3
Project Site Photographs
Former Monterey-1 MGP Site
498 Del Monte Avenue
Monterey, California

Environmental Resources Management
www.erm.com
ERM



LEGEND

- PROPERTY BOUNDARY
- CHAIN LINK FENCE
- TEMPORARY FENCE
- EXCAVATION AREA

N

0 20 40

FEET

Figure 4

Key Remediation Project Elements
Former Monterey - 1 MGP Site
498 Del Monte Avenue
Monterey, California

Environmental Resources Management
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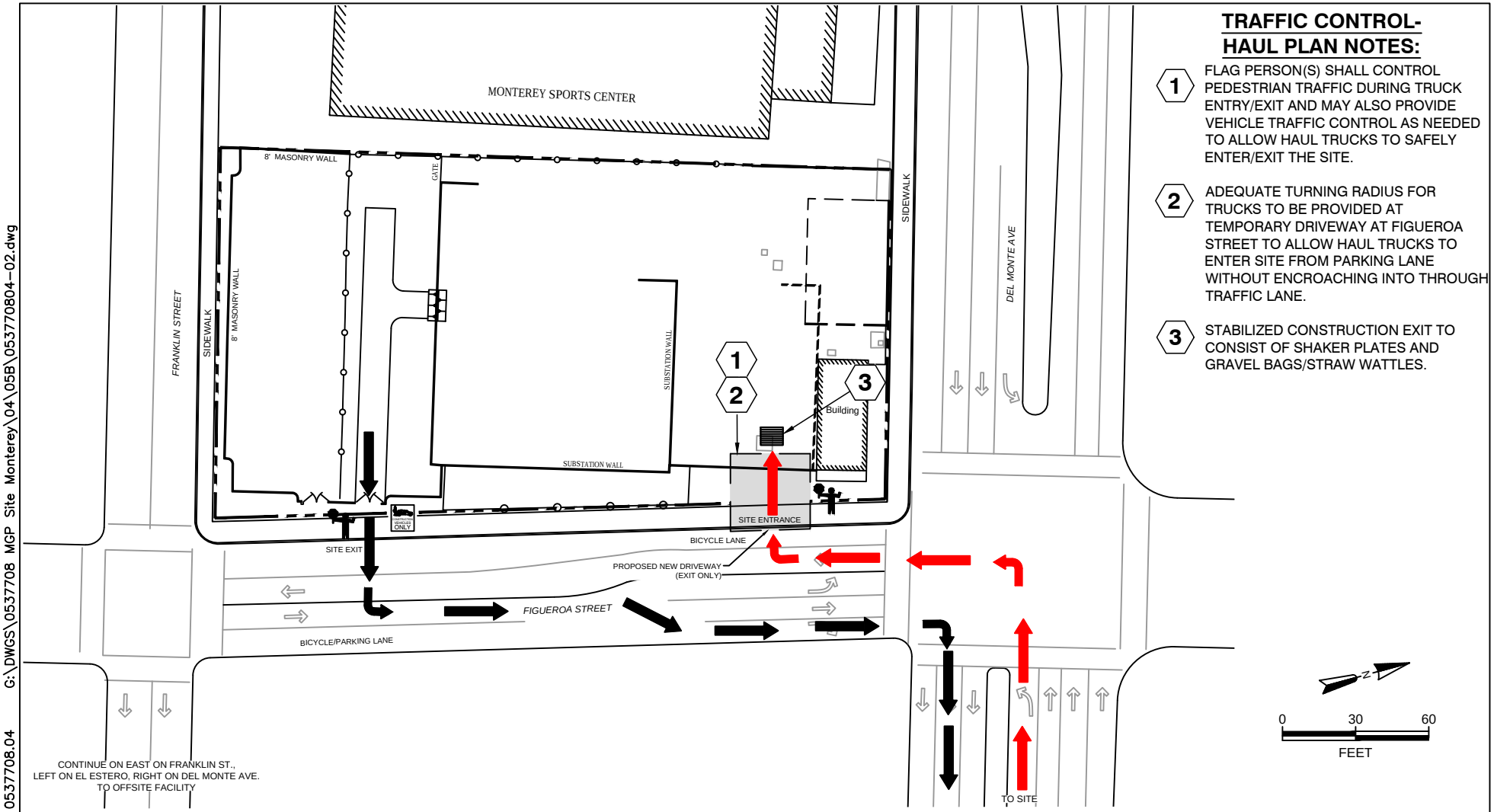

TRAFFIC CONTROL-HAUL PLAN NOTES:

1. FLAG PERSON(S) SHALL CONTROL PEDESTRIAN TRAFFIC DURING TRUCK ENTRY/EXIT AND MAY ALSO PROVIDE VEHICLE TRAFFIC CONTROL AS NEEDED TO ALLOW HAUL TRUCKS TO SAFELY ENTER/EXIT THE SITE.
2. ADEQUATE TURNING RADIUS FOR TRUCKS TO BE PROVIDED AT TEMPORARY DRIVEWAY AT FIGUEROA STREET TO ALLOW HAUL TRUCKS TO ENTER SITE FROM PARKING LANE WITHOUT ENCROACHING INTO THROUGH TRAFFIC LANE.
3. STABILIZED CONSTRUCTION EXIT TO CONSIST OF SHAKER PLATES AND GRAVEL BAGS/STRAW WATTLES.

EXPLANATION

- PROPERTY LINE
- CHAIN LINK FENCE
- TEMPORARY FENCE
- INCOMING PROJECT TRAFFIC
- OUTGOING PROJECT TRAFFIC
- TRAFFIC FLOW (EXISTING)
- FLAG PERSON
- CONSTRUCTION VEHICLES ONLY
- TEMPORARY TRUCK DRIVEWAY

Figure 5

Traffic Flow During Project Activities
Former Monterey - 1 MGP Site
498 Del Monte Avenue
Monterey, California

Environmental Resources Management
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ERM

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6/30/2020
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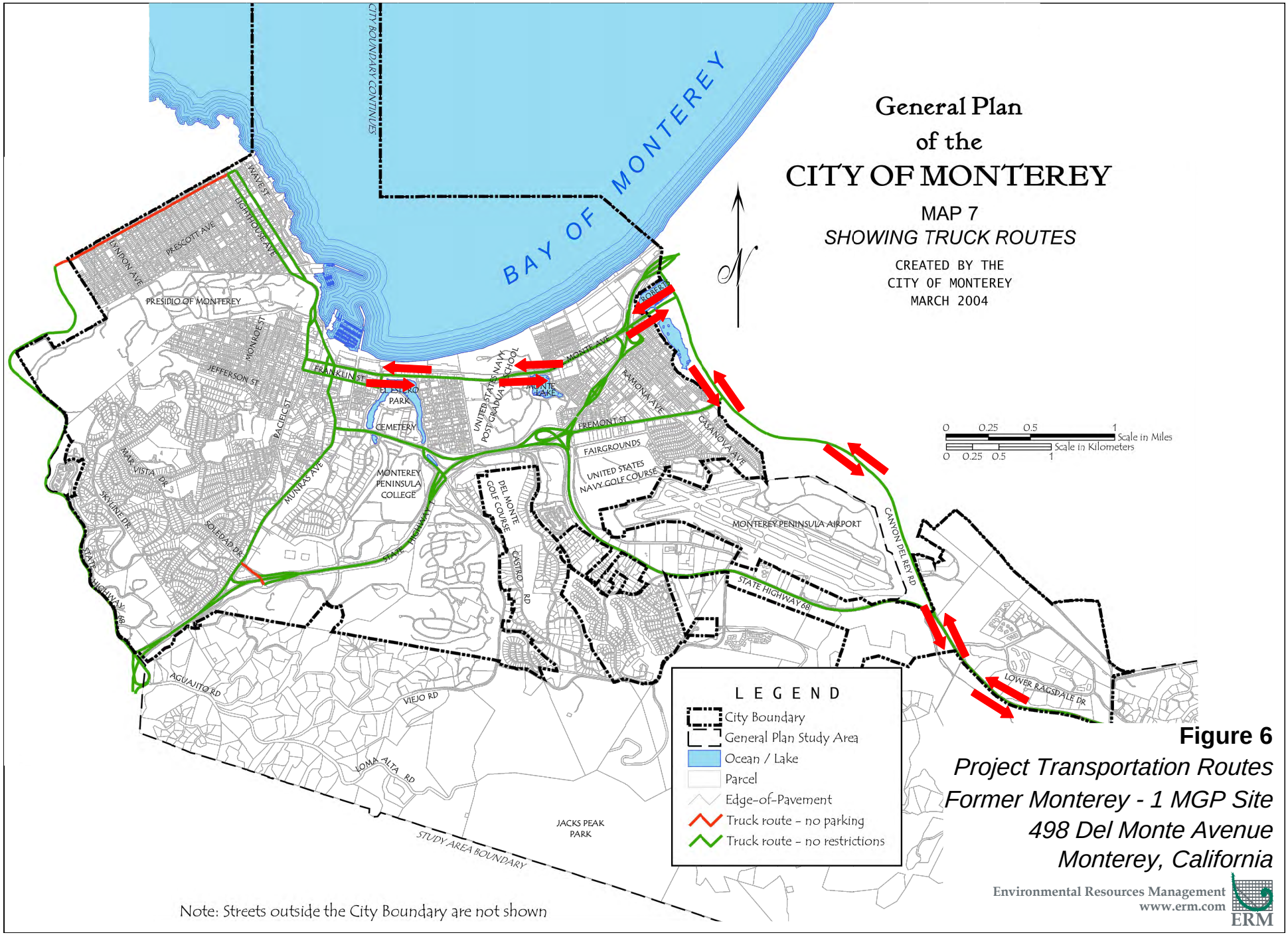

Figure 6

Project Transportation Routes
Former Monterey - 1 MGP Site
498 Del Monte Avenue
Monterey, California

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