MONTEREY COUNTY
HOUSING & COMMUNITY DEVELOPMENT
1441 SCHILLING PL SOUTH 2nd FLOOR, SALINAS, CA 93901
PHONE: (831) 755-5025/FAX: (831) 757-9516

INITIAL STUDY

BACKGROUND INFORMATION

Project Title:	Robert Louis Stevenson School
File No.:	PLN220243
Project Location:	3152 Forest Lake Road, Pebble Beach
Name of Property Owner:	Robert Louis Stevenson School
Name of Applicant:	Edward F. DiYanni
Assessor's Parcel Number(s):	008-022-023-000 and 008-022-033-000
Acreage of Property:	9.891 Acres; Impact Area: 2.0 acres
General Plan Designation:	Del Monte Forest LUP
Zoning District:	Institutional Commercial and Resource Conservation with a Design Overlay District, Coastal Zone: IC-D(CZ) and RC-D(CZ)
Lead Agency:	Monterey County Housing and Community Development
Prepared By:	Denise Duffy and Associates, Inc.
Date Prepared:	March 2023
Contact Person:	Mike Novo, AICP, Management Specialist, Monterey County Housing and Community Development
Phone Number:	(831) 755 - 5176

II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. Description of Project:

The Robert Louis Stevenson School Project ("Proposed Project" or "Project") consists of the demolition of the existing Lindsley Science Building and the construction of a new math, science, and engineering center located at the Robert Louis Stevenson School. The existing Lindsley Science Building is characterized as an outdated 8,630 square-foot classroom building constructed in 1968. The Proposed Project would construct a new approximately 38,000 square-foot (including roof overhangs) building in substantially the same location as the existing Lindsley Science Building. In addition to the demolition of the existing Lindsley Science Building, the Proposed Project would also remove existing pathways and landscaped area in the immediate vicinity of the existing building.

The new educational building, also referred to as the Math, Science, and Engineering Center ("MSEC") would be approximately 38,000 square feet, with approximately 35,711 within the exterior walls, and would be constructed substantially within the footprint of the existing Lindsley Science Building. The new education building consists of a two-story educational building with a finished basement and exterior roof deck. The proposed MSEC would have a maximum building height of 35 feet.[1] The building would include classrooms, science labs, faculty offices, conference rooms, and student collaboration spaces. The basement would contain a maker space and space for future hydroponic labs, a research project lab, and a demonstration space. The exterior rooftop deck would be used for astronomy classes, and physics experiments, and would also include rooftop PV arrays. **Figure 1** shows the proposed site plan.

The new MSEC would include a gently sloping landscaped courtyard with terraced seat-walls to the southeast. Landscaping would be included around the exterior of the building and would provide areas for bioretention and stormwater management around the north and west sides of the building. Building materials would include local Carmel stone, terracotta shingles, cement board siding, plaster stucco, and would also include energy efficient windows.

Construction

Construction of the Proposed Project would generally involve tractors, backhoes, compactors, excavators, rollers, dump trucks, etc. Most of the equipment would be brought to the site at the beginning of work and remain until the completion of construction. As necessary, trucks would bring materials to the site. Deliveries would likely take place over a short period of time (e.g., less than a month). The estimated number of construction workers on site at any one time would be approximately 10 – 100 workers. Construction would begin in Summer 2023 and be completed by Summer 2025.

[1] For the purpose of describing and evaluating the new educational building, Whitson Engineers defines the new education building as a two (2) story structure. Two (2) stories would be above grade. A basement would be included in the construction and operation of the new educational building.

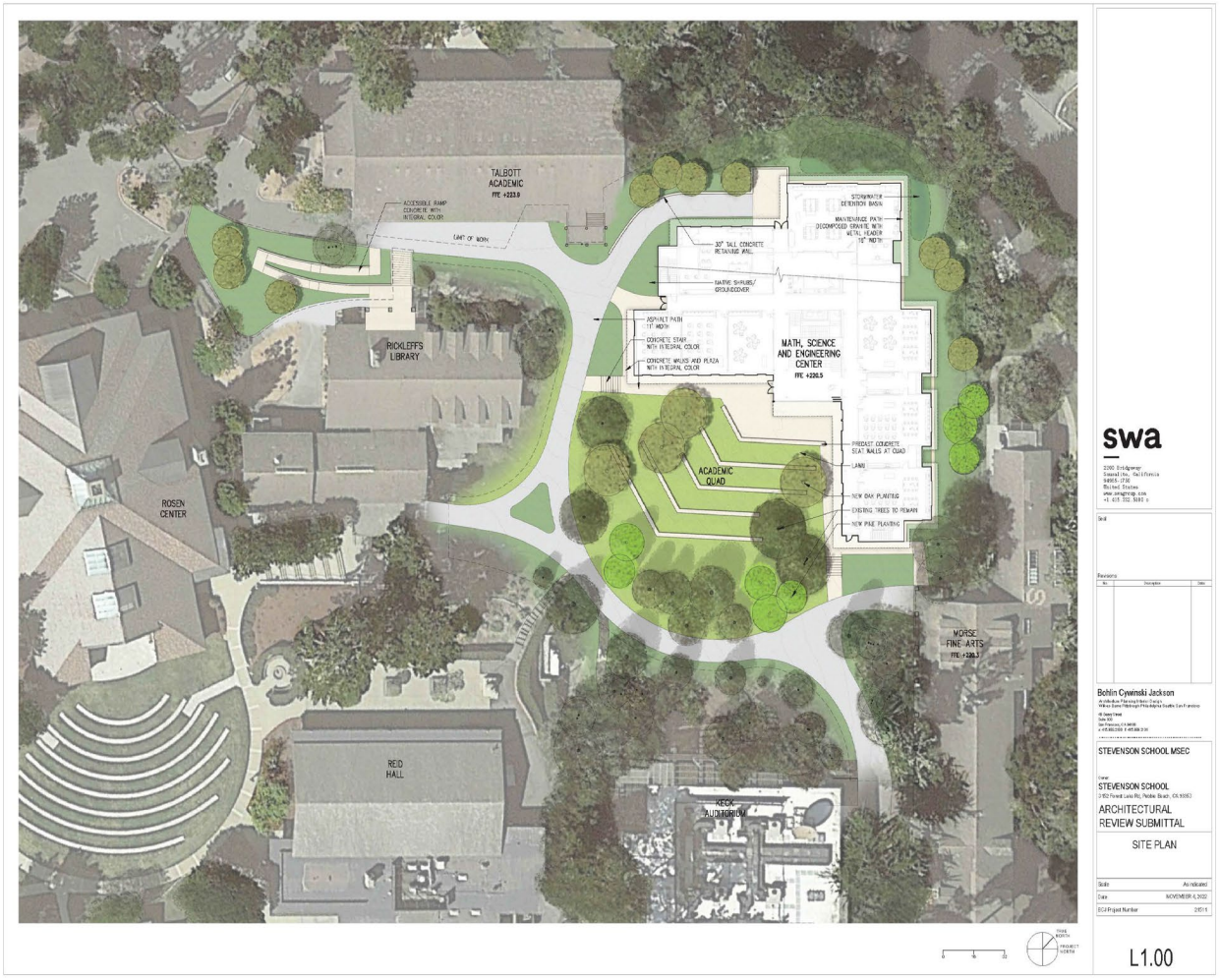


Figure 1 – Site Plan

The start of construction depends on the Project approval date, seasonal factors, and the contractor's schedule. Construction activities would be limited to the hours between 7AM – 7PM, Monday through Saturday. No construction activities would occur on Sundays or holidays. Local site access is provided along Lisbon Lane, Forest Lake Road, and 17 Mile Drive. Regional site access is provided by State Route 1.

Site Preparation & Demolition

The Proposed Project would require the demolition of the existing 8,630-square-foot Lindsley Science Building. Demolition activities would include removing the existing building, concrete pathway, sidewalk, and aggregate base as detailed in **Figure 2, Proposed Project Demolition Plan**. Site preparation work would include staging of construction equipment, initial grading activities, vegetation, and tree removal (see below), and other related activities.

Grading

The Proposed Project would require approximately 5,360 cubic yards of cut and 290 of fill. The Proposed Project would require approximately 5,070 cubic yards of export. The estimated area of disturbance would equate to 1.21 acres.

Pervious and Impervious Cover

The Proposed Project would result in 26,076 square-feet of impervious coverage. 14,563 square-feet of which are comprised of structures, and 11,513 square-feet of which are other surfaces (e.g., pathways). The Project would result in 8,266 square-feet of pervious coverage.

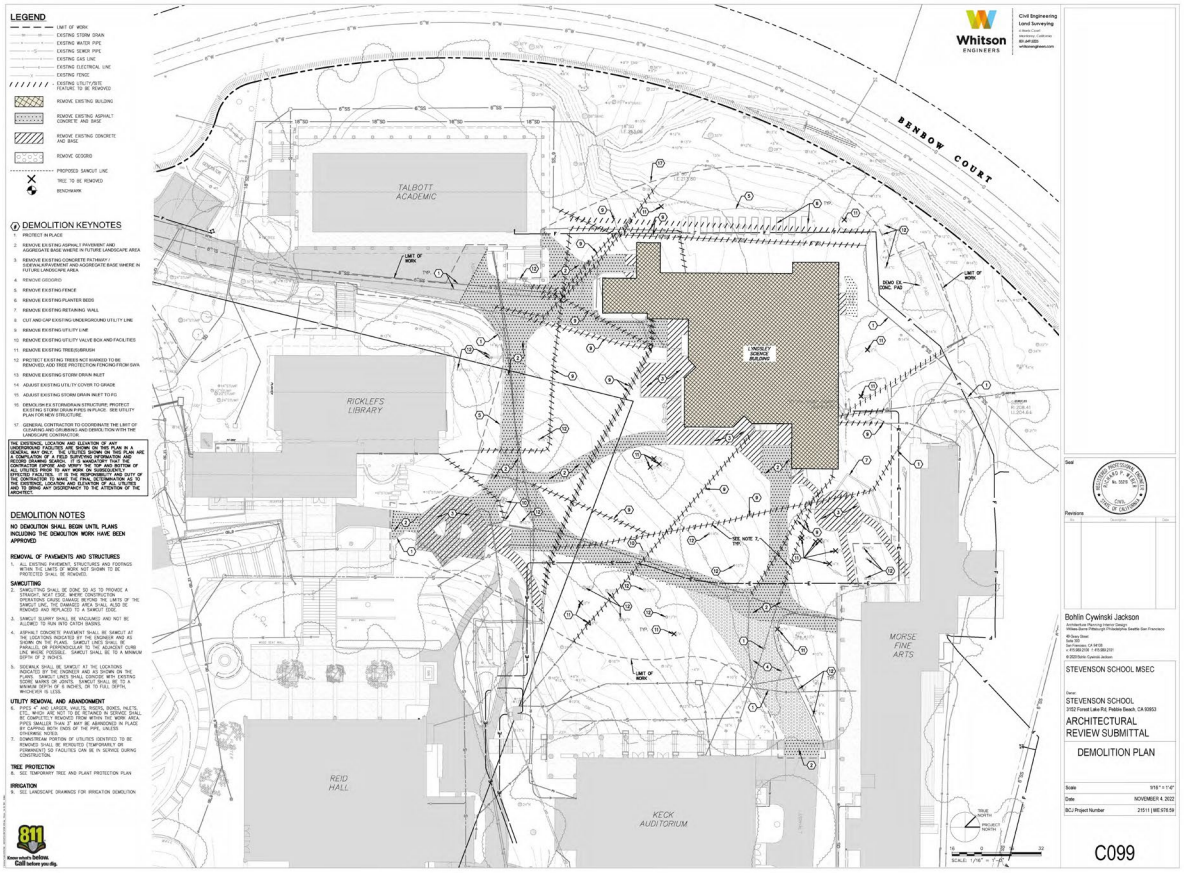
Tree Removal

The Proposed Project would require the removal of up to 16 trees. Specifically, the Proposed Project would remove four (4) Monterey pine trees (*Pinus radiata*), 11 Coast Live Oak (*Quercus agrifolia*), and one (1) Monterey Cypress (*Cupressus macrocarpa*). The trees removed would range from six (6) inches to 22 inches in diameter. The Project site would be landscaped with native shrubs and trees. The 16 trees removed would be replaced at a 1:1 ratio and consist primarily of Monterey pine and Coast Live oak.

B. Surrounding Land Uses and Environmental Setting:

The Proposed Project is located at 3152 Forest Lake Road, in the community of Pebble Beach, Monterey County, California. More specifically, the Proposed Project is located on the existing Robert Louis Stevenson School campus, which covers approximately 47 acres along Forest Lake Road and Viscaino Road. The Project consists of the demolition and subsequent construction of a science building on Assessor's Parcel Numbers ("APN") 008–022–023 and 008–022–033. The subject parcels front onto Forest Lake Road. The Proposed Project is located in unincorporated Monterey County. The site is designated as Institutional Commercial ("IC-D(CZ)") and Resource Conservation ("RC-D(CZ)"), with a Design overlay zoning district.

Figure 2 – Proposed Site Demo



The Project is located in the Del Monte Forest Land Use Plan ("DMF LUP"). **Figure 3** shows the Proposed Project site and surrounding land uses. The area of the proposed development is relatively flat ground, and is almost entirely developed with buildings, paved pathways, lawns, and landscaping. The Proposed Project area is located within the existing campus footprint. The site is surrounded by existing campus development, residential uses, and existing golf courses.

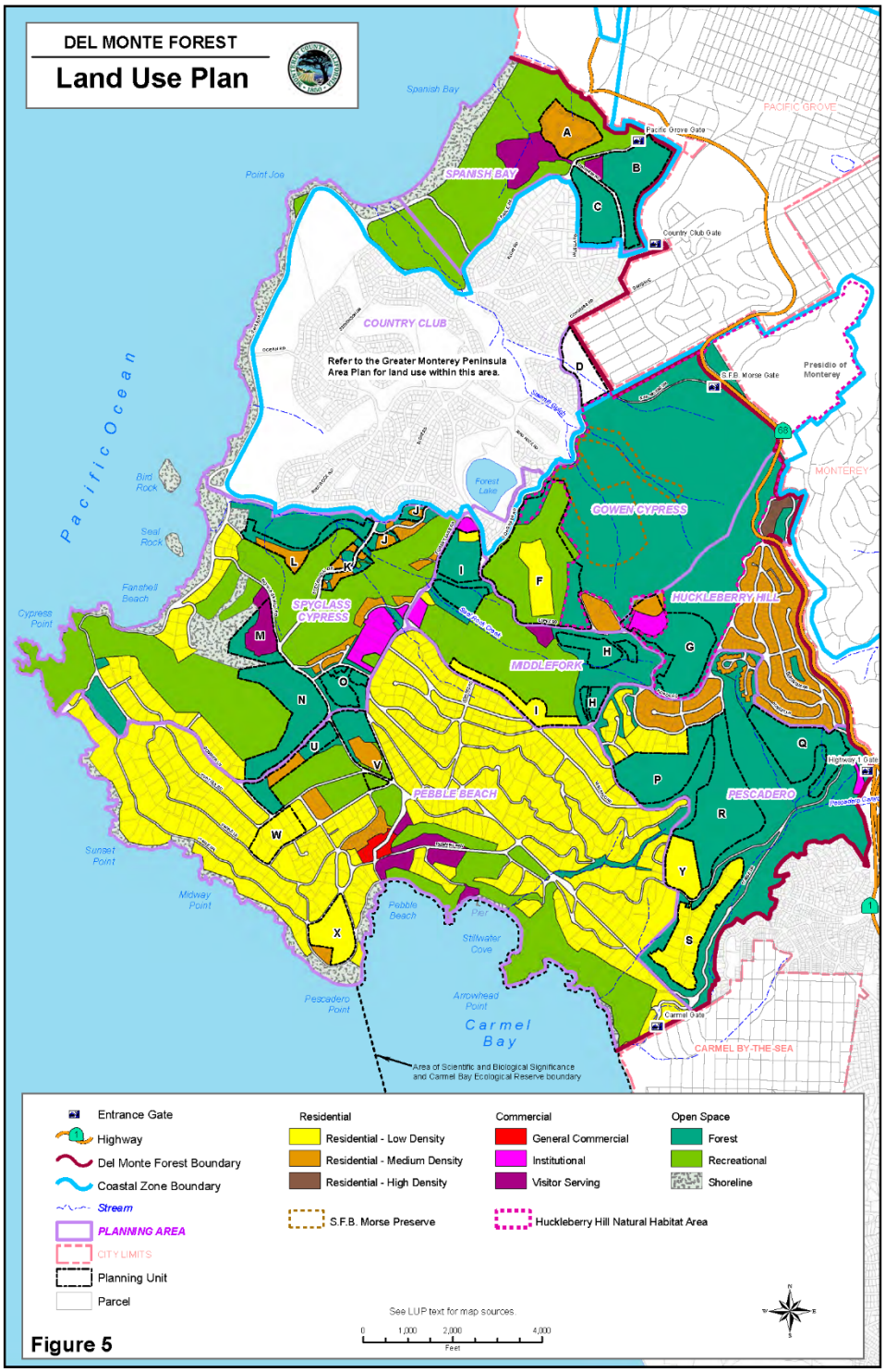
C. Other public agencies whose approval is required:

The IS/MND is an informational document for both agency decision-makers and the public. The County is the lead agency responsible for adoption of the IS/MND and approving land use permits related to the Proposed Project. Below is a list of approvals required by Monterey County. Project entitlements would include, but not be limited to:

- Coastal Administrative Permit
- Grading Permit(s)
- Building Permit(s)
- Demolition Permit for existing infrastructure

Other agencies that could have permit or review authority over some aspect of the Proposed Project may include Monterey Bay Air Resources District ("MBARD"), Monterey Peninsula Water Management District ("MPWMD"), and the California Department of Fish & Wildlife ("CDFW").

Figure 3 – Land Use Map



III. PROJECT CONSISTENCY WITH OTHER APPLICABLE LOCAL AND STATE PLANS AND MANDATED LAWS

Use the list below to indicate plans applicable to the project and verify their consistency or non-consistency with project implementation.

General Plan/Area Plan	☒	Air Quality Mgmt. Plan	☒
Specific Plan	☐	Airport Land Use Plans	☐
Water Quality Control Plan	☒	Local Coastal Program-LUP	☒

General Plan/Local Coastal Program LUP: Within the coastal areas of unincorporated Monterey County, the 1982 General Plan policies apply where the Local Coastal Program ("LCP") is silent. This is typically limited to noise policies as the LCP policies contain the majority of development standards applicable to development in the coastal areas. The Proposed Project is located in unincorporated Pebble Beach. Land use and development within Pebble Beach is governed by the DMF LUP. The Proposed Project would result in temporary construction-related noise, but would not increase noise above the ambient levels since the Proposed Project would not change the site's existing use (i.e., the Proposed Project would replace an existing academic building). The Proposed Project is designated as Institutional Commercial and Forest, and zoned IC-D(CZ) and RC-D(CZ)for institutional commercial uses. The Proposed Project is consistent with the allowable uses within these designations. **CONSISTENT**

Water Quality Control Plan: The subject property lies within Region 3 of the Central Coast Regional Water Quality Control Board which regulates sources of water quality-related issues resulting in actual or potential impairment or degradation of beneficial uses, or the overall degradation of water quality. Construction of the Proposed Project could result in temporary effects (e.g., erosion). Operation of the Project would not generate pollutant runoff in amounts that would cause degradation of water quality. In accordance with Chapter 16.12 of the Monterey County Code ("MCC"), the Proposed Project shall be required to submit a drainage and erosion control plan to HCD-Environmental Services prior to issuance of building permits. For additional discussion on hydrology and water quality, please refer to **Section VI.10 Hydrology and Water Quality**. **CONSISTENT**

Air Quality Management Plan: The Proposed Project is located within the North Central Coast Air Basin ("NCCAB"), which includes unincorporated areas of Monterey County. Air quality in the Project area is managed and regulated by the Monterey Bay Air Resources District ("MBARD"). MBARD has developed Air Quality Management Plans ("AQMPs") and CEQA Air Quality Guidelines to address attainment and maintenance of state and federal ambient air quality standards within the NCCAB. The 2012-2015 AQMP, the 2008 CEQA Air Quality Guidelines, and 2016 Guidelines for Implementing the California Environmental Quality Act are the most recent documents used to evaluate attainment and maintenance of air quality standards. The California Air Resources Board ("CARB") uses ambient data from each air monitoring site in the NCCAB to calculate Expected Peak Day Concentration over a consecutive three-year period. The closest

air monitoring station is located in Carmel Valley. Based on available air quality monitoring data, there are no indications that the Proposed Project would cause a significant impact to air quality or greenhouse gas emissions. Demolition of the existing science building would be required to comply with the MBARD Rule 439 which identifies actions to be implemented to reduce air pollution during demolition. Similarly, the Proposed Project would implement best management practices during construction to ensure impacts to air quality and greenhouse gases are less than significant. For a more detailed evaluation, please refer to **Section VI.3 Air Quality**. **CONSISTENT.**

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

A. FACTORS

The environmental factors checked below would be potentially affected by this project, as discussed within the checklist on the following pages.

☒ Aesthetics	☐ Agriculture and Forest Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Energy
☒ Geology/Soils	☒ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials
☒ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☒ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☒ Transportation/Traffic	☒ Tribal Cultural Resources
☒ Utilities/Service Systems	☒ Wildfires	☒ Mandatory Findings of Significance

Some proposed applications that are not exempt from CEQA review may have little or no potential for adverse environmental impact related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a non-sensitive environment, and are easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impact (and not checked above), the following finding can be made using the project description, environmental setting, or other information as supporting evidence.

☐ Check here if this finding is not applicable

FINDING: For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation or maintenance of the proposed project and no further discussion in the Environmental Checklist is necessary.

EVIDENCE:

Agricultural and Forestry Resources: The California Department of Conservation Division of Land Resource Protection and the Farmland Mapping and Monitoring Program maps California's agricultural resources. The Proposed Project is designated as "Urban and Built-Up" and therefore would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation, 2023). The Project is not zoned for agricultural use and is not under a Williamson Act contract (California Department of Conservation, 2023). A portion of APN 008-022-033 is designated and zoned as Resource Conservation and a land use designation of Forest; however, the Proposed Project would not result in the loss or conversion of forest land for non-forest land use. Therefore, there would be no impacts to agriculture and forestry resources.

Land Use: The Proposed Project is located on a legal lot of record designated for Institutional Commercial uses. Moreover, the Proposed Project would consist of the demolition of the existing Lindsley Science Building and the subsequent construction of a new science building within the existing footprint. Therefore, the Project would not divide an established community. The Proposed Project would be designed in accordance with all applicable development standards defined by the Monterey County General Plan and the DMF LUP. As a result, the Proposed Project would not result in any land use or planning-related effects.

Mineral Resources: Mineral resources are determined in accordance with the Surface Mining and Reclamation Act ("SMARA") of 1975, and the California Geological Survey which maps regional significance of mineral resources. There are no known mineral resources on the Project site (CGS, 2023). As a result, the Proposed Project would not result in the loss of availability of a known mineral resource that would be a value to the region and residents of the state. Additionally, the Project site is also not designated as a mineral resource recovery site. Therefore, the Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site. The Proposed Project would not result in any impacts to mineral resources.

Population and Housing: The Proposed Project consists of the demolition of an existing education building to accommodate a new educational building. The Project would not induce substantial population growth either directly or indirectly. The Project would not change the existing use of the site or increase the number of students or staff such that potential growth-inducing impacts would occur. The Proposed Project would not displace existing housing units. Therefore, the Proposed Project would not result in any population or housing-related impacts.

Public Services: The Proposed Project would not result in any adverse impacts resulting in the need for new, or physically altered, government facilities to maintain acceptable service ratios,

response times, or other performance objectives for any public services (i.e., fire protection, police protection, schools, parks, or other public facilities). The Project site is currently served by the Pebble Beach Community Services District ("PBCSD") which contracts with the California Department of Forestry and Fire Protection ("CalFire") to provide fire protection services. Two fire stations in Pebble Beach would serve the Project site consistent with existing school operations. These include the Pebble Beach Fire Station and the Carmel Hill Fire Station. The Monterey County Sheriff's Department currently provides police protection services in Pebble Beach. The Carmel Unified School District ("CUSD") serves the community of Pebble Beach, but the Proposed Project consists of modifications to an existing private school and would not cause an increase in student population in the CUSD. The Proposed Project consists of the demolition of an existing academic building and the subsequent construction of a replacement building. Therefore, the Proposed Project would not generate any new demand for public services beyond current levels associated with existing campus operation.

Recreation: The Project would not result in an increased use of existing neighborhood and/or regional parks or other recreational facilities causing a substantial physical deterioration. No parks, trail easements, or other recreational opportunities would be adversely impacted by the Proposed Project. Therefore, the Proposed Project would not result in any adverse recreation-related impacts.

B. DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment 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.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that 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.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Mike Novo, AICP, Management Specialist,
Monterey County Housing and Community Development

March 21, 2023

Date

V. EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).

2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista? (Source:) (sources: 6,7,8)	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (sources: 5, 6,7,8)	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality. (sources: 6,7,8,24)	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (sources: 6,7,8,24)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The Proposed Project site is part of the larger Robert Louis Stevenson School campus. The Proposed Project site is surrounded by existing academic buildings, classrooms, dormitories, dining facilities, and other related academic uses associated with the existing campus. The Proposed Project site consists predominantly of existing developed areas that are improved with educational facilities. The site is located in the Del Monte Forest and various native tree species, including Monterey Pine trees, are interspersed throughout the existing campus and immediately adjacent to the Proposed Project. As noted above, the Proposed Project would require the removal of four (4) Monterey Pine trees, 11 Coast Live oaks, and one (1) Monterey Cypress tree.

The Proposed Project site is not located in a critical viewshed or within view from a State designated scenic highway. Similarly, the Proposed Project site is not located on a locally designated scenic roadway or a designated public viewing area. State Route ("SR") 1, the nearest State designated scenic highway, is two (2) miles east of the Proposed Project site (Caltrans, 2023). The Proposed Project site is not visible from this segment of SR 1 or any critical viewing areas along SR 1. Similarly, the Proposed Project site is not visible from any locally designated scenic corridors. While the DMF LUP identifies scenic viewsheds along 17-mile Drive and describes 17-mile Drive as a scenic corridor, the Proposed Project site is not visible from 17-mile Drive. Moreover, the Proposed Project site is generally not visible from any publicly accessible roadways – the Proposed Project site is located within the existing Robert Louis Stevenson School campus

and views of the site from the surrounding area are generally obstructed by existing buildings and vegetation.

Aesthetic Impact (a) Less than Significant: The Proposed Project would not have a substantial adverse effect on a scenic vista. The Project is not located within an area that is designated as a public viewing area or within a critical viewshed. Moreover, the Proposed Project consists of the demolition of an existing academic building and the subsequent construction of a replacement building within substantially the same footprint as the existing building. Additionally, views of the site are generally limited due to existing vegetation, changes in topography, and existing buildings associated with the Robert Louis Stevenson School. For these reasons, the Proposed Project would not have a substantial adverse impact on a scenic vista. This represents a less than significant impact.

Aesthetic Impact (b) No Impact: The Project would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. The segment of SR 1 located east of the Project site is designated as a scenic highway. However, the Project site is not visible from SR 1, nor can SR 1 be seen from the Project site. Similarly, the Proposed Project site is not visible from any designated scenic corridors or a common public viewing area. The Proposed Project site is located entirely within the existing Robert Louis Stevenson School campus and is surrounded by existing academic buildings and vegetation that generally obstruct views of the Proposed Project site from surrounding areas. As a result, the Proposed Project would not impact any scenic resources within view of a state designated scenic highway. There would be no impact from the Proposed Project.

Aesthetic Impact (c) Less than Significant: The Proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The Project would be located entirely within the existing Robert Louis Stevenson School campus. As discussed above, the Proposed Project would consist of the demolition of the existing Lindsley Science Building to construct a new educational building. The Proposed Project would be constructed within substantially the same footprint as the existing science building and would be designed to be visually compatible with the existing campus. Moreover, the Proposed Project site is generally not visible from the surrounding area. The Proposed Project site is not visible from any public viewing areas and views of the site are generally obstructed by existing vegetation and educational buildings. As a result, the Proposed Project would not degrade public views of the site or its surroundings. For these reasons, this represents a less than significant impact.

Aesthetic Impact (d) Less than Significant: The Proposed Project consists of the demolition of an existing academic building and the subsequent construction of a new education building in substantially the same location. The Proposed Project is located within an existing developed area associated with the Robert Louis Stevenson School that is improved with various sources of exterior lighting. The Proposed Project does not entail any nighttime construction-related activities; therefore, the Proposed Project would not result in any temporary increases in construction lighting. Similarly, operation of the Proposed Project would not substantially increase lighting beyond existing conditions. The site is currently improved with various sources of campus

lighting. The Proposed Project includes exterior lighting along pathways and the new building. All exterior lighting would comply with standard Monterey County conditions of approval and would be recessed or downlit, consistent with the design requirements set by the DMF LUP, Monterey County General Plan, and Title 20. This represents a less than significant impact.

2. AGRICULTURAL AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (sources: 6,7,1)	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (sources: 1, 2, 6,7)	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)? (sources: 1, 6,7)	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use? (sources: 1, 6,7)	☐	☐	☐	☒
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? (sources: 1, 6,7)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on agricultural or forest land resources.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan? (sources: 4, 9,10)	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? (sources: 4, 9,10)	☐	☐	☒	☐
c) Result in significant construction-related air quality impacts? (sources: 4, 9,10)	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations? (sources: 4, 9,10)	☐	☐	☒	☐
e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (sources: 4, 9,10)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The Proposed Project is located within the North Central Coast Air Basin ("NCCAB"), which is under the jurisdiction of the Monterey Bay Air Resources District ("MBARD"). MBARD is responsible for producing an Air Quality Management Plan ("AQMP") that reports air quality and regulates stationary air pollution sources throughout the NCCAB. MBARD is also responsible for measuring the concentration of pollutants and comparing those concentrations against Ambient Air Quality Standards ("AAQS"). Additionally, MBARD monitors criteria pollutants to determine whether they are in attainment or not in attainment. **Table 3-1** illustrates the attainment status for criteria pollutants.

Table 3-1 Attainment Status for the NCCAB		
Pollutants	**State Designation**	**Federal Designation**
Ozone (O_3)	Nonattainment – Transitional	Attainment
Inhalable Particulates (PM_{10})	Nonattainment	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Attainment
Carbon Monoxide (CO)	Monterey Co. – Attainment	Attainment
	San Benito Co. – Unclassified	Attainment
	Santa Cruz Co. – Unclassified	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment

Table 3-1 Attainment Status for the NCCAB		
Pollutants	**State Designation**	**Federal Designation**
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Attainment
Source: Monterey Bay Air Resources District, 2017. 2012 – 2015 Air Quality Management Plan		

MBARD has set air quality thresholds of significance for the evaluation of projects. **Table 3-2** illustrates the thresholds of significance used to determine if a project would have a significant air quality effect on the environment during construction.

Table 3-2 Thresholds of Significance Construction Emissions	
Pollutant	**Threshold of Significance (lb./day)**
Nitrogen Oxides (NOx)	137
Reactive Organic Gases (ROG)	137
Respirable Particular Matter (PM_{10})	82
Fine Particulate Matter ($PM_{2.5}$)	55
Carbon Monoxide (CO)	550
Source: Monterey Bay Unified Air Pollution Control District, 2016. Guidelines for Implementing the California Environmental Quality Act.	

In addition to these thresholds, MBARD has also determined that a significant short-term construction generated impact would occur if more than 2.2 acres of major earthmoving (i.e., excavation) per day was to occur. Activities associated with this threshold include excavation and grading. For projects that require minimal earthmoving activities MBARD has determined that a significant short-term construction generated impact would occur if more than 8.1 acres per day of earthmoving was to occur (MBARD, 2008).

Table 3-3 illustrates the thresholds of significance used to determine if a project would have a significant air quality effect on the environment during operation.

Table 3-3 Thresholds of Significance Operational Emissions	
Pollutant	**Threshold of Significance (lb./day)**
Nitrogen Oxides (NOx)	137
Reactive Organic Gases (ROG)	137
Respirable Particular Matter (PM_{10})	82
Fine Particulate Matter ($PM_{2.5}$)	55
Carbon Monoxide (CO)	550
Source: Monterey Bay Unified Air Pollution Control District, 2016. Guidelines for Implementing the California Environmental Quality Act.	

The California Air Resources Board ("CARB") defines a sensitive receptor as children, elderly, asthmatic, and others who are at high risk of negative health outcomes due to exposure to air pollution. Pursuant to California Health and Safety Code Sec. 42705.5, a sensitive receptor includes hospitals, schools and day cares centers and such locations as the district or state board may determine. MBARD similarly defines sensitive receptors and adds that the location of

sensitive receptors be explained in terms that draw a relationship to the project site and potential air quality impacts.

Air Quality Impact (a) No Impact: CEQA Guidelines Sec. 15125(b) requires that a project be evaluated for consistency with applicable regional plans, including the AQMP. MBARD is required to update their AQMP every three (3) years. The most recent update was the 2012 – 2015 AQMP which was adopted in March 2017. This plan addresses attainment of the State ozone standard and Federal air quality standards. The AQMP accommodates growth by projecting growth in emissions based on population forecasts prepared by the Association of Monterey Bay Area Governments ("AMBAG") and other indicators. Consistency determinations are issued for commercial, industrial, residential, and infrastructure related projects that have the potential to induce population growth. A project is considered inconsistent with the AQMP if it has not been accommodated in the forecast projects considered in the AQMP. The Proposed Project consists of the demolition of the existing Lindsley Science Building to facilitate the construction of a new educational building. The Proposed Project would be located within the existing Robert Louis Stevenson School, and would not induce substantial population growth or result in the need for additional residential development beyond what currently exists. Therefore, the Proposed Project would not conflict with or obstruct an applicable air quality plan. There would be no impact.

Air Quality Impact (b) and (c) Less than Significant: The MBARD 2016 CEQA Air Quality Guidelines contain standards of significance for evaluating potential air quality effects of projects subject to the requirements of CEQA. According to MBARD, a project would violate an air quality standard and/or contribute to an existing or projected violation if it would emit (from all sources, including exhaust and fugitive dust) more than:

- 137 pounds per day of oxides of nitrogen (NO_x),
- 137 pounds per day of reactive organic gases (ROG),
- 82 pounds per day of respirable particulate matter (PM_{10}),
- 55 pounds per day of fine particulate matter ($PM_{2.5}$), and
- 550 pounds per day carbon monoxide (CO).

According to the MBARD's criteria for determining construction impacts, a project would result in a potentially significant impact if it would result in 8.1 acres of minimal earthmoving per day or 2.2 acres per day with major grading and excavation.

Construction of the Proposed Project would require 5,360 cy of cut and 290 cy of fill, with 5,020 cy of export. Construction would require equipment such as tractors, backhoes, excavators, loading trucks, and pickup trucks. Construction related emissions would come from sources such as exhaust or fugitive dust. Construction of the Proposed Project would not, however, exceed MBARD's significance criteria. The Proposed Project would result in minimal ground-disturbing activities. Specifically, the Proposed Project would disturb approximately 2.0 acres. Grading and excavation related activities would occur over several days and would not exceed MBARD's daily ground disturbing thresholds for excavation (2.2 acres per day) or grading (8.1 acres per day). Therefore, the Proposed Project would have a less than significant construction-related air quality

impact. Moreover, the Proposed Project would implement standard construction Best Management Practices ("BMPs") related to dust suppression (e.g., watering active construction areas, prohibiting grading activities during periods of high wind (over 15 mph), covering trucks hauling soil, covering exposed stockpiles, etc.) thereby further ensuring that temporary construction-related effects would be minimized. Additionally, the Proposed Project would be required to comply with MBARDs Rule 439. Rule 439 includes *Demolition and Deconstruction Notes* on the construction plans that address mechanisms for reducing air pollution during demolition. For these reasons, construction of the Project would have a less than significant impact to air quality.

The Project could result in operational emissions due to operational energy use and traffic. However, it is unlikely that the Project would result in a significant impact for several reasons. First, the Proposed Project would replace an existing, outdated, academic building with a new educational building with energy efficient upgrades. The Proposed Project would be constructed in accordance with contemporary building standards and would include PV solar arrays and energy efficient aluminum windows and curtain wall glazing assemblies. The installation of energy efficient building upgrades would reduce operational energy demand. Second, the Proposed Project, as a replacement building, would not result in any additional traffic trips beyond those associated with existing campus operations. Therefore, there would not be any increases in operational emissions associated with traffic-related impacts. Third, the Proposed Project would not increase student enrollment, which would generate additional operational emissions. As a result, operational emissions associated with the Project would not exceed an applicable MBARD threshold of significance. The site is currently used for educational purposes. As previously discussed, the Project consists of the demolition of an existing educational building and the construction of a replacement building. Operation of the Proposed Project would not result in an increase of criteria pollutants beyond existing levels. See **Section VI.5 Energy**, below, for more information regarding energy consumption. For these reasons, the Proposed Project would result in a less than significant impact to air quality during operation.

Air Quality Impact (d) Less than Significant: The Proposed Project is located within the existing Robert Louis Stevenson School. The Robert Louis Stevenson School is a boarding school; on-campus residential halls are located within a ¼ mile south of the Project site. Other residential uses are located within ¼ miles to the west. Residential uses are also located approximately 200 feet north of the site. CARB identifies sensitive receptors as children, elderly, asthmatics and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Locations where sensitive receptors congregate may include hospitals, schools, and day care centers. As discussed above, construction of the Project would generate temporary air quality impacts. However, these impacts would be temporary in nature and would not exceed the thresholds set by MBARD. Operation of the Proposed Project would not result in increased air quality impacts beyond existing levels. Therefore, the Project would not result in a significant impact.

Air Quality Impact (e) Less than Significant: Construction of the Project could generate temporary odors from construction equipment (e.g., diesel exhaust) which could be noticeable at times to residences, students, and faculty in the Project vicinity. However, construction generated

odors would be temporary in nature and would not create objectionable odors that would affect a substantial number of persons. This represents a less than significant impact.

4. BIOLOGICAL RESOURCES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game or U.S. Fish and Wildlife Service? (sources: 6,7,8, 11,12,13,14,15)	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (sources: 6,7,8, 11,12,13,14,15)	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (sources: 6,7,8, 11,12,13,14,15)	☐	☐	☒	☐
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? (sources: 6,7,8, 11,12,13,14,15)	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (sources: 6,7,8, 11,12,13,14,15)	☐	☒	☐	☐
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? (sources: 6,7,8, 11,12,13,14,15)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Kevin Merk Associates ("KMA") conducted a comprehensive assessment of biological resources in connection with the Robert Louis Stevenson School Master Plan Update. That assessment, *Stevenson School Pebble Beach Campus Monterey County, California Biological Resources*

Assessment for the General Development Plan Amendment Project (July 2022), evaluated potential impacts associated with future development activities within the entire campus, including the Proposed Project site, as part of long-range planning efforts being separately undertaken by the Applicant. KMA also prepared a supplemental, project-specific, evaluation of potential effects associated with the Proposed Project. Similarly, Thompson Wildland Management prepared several technical reports related to planned campus improvements and on-going fuel management. These include the following: the *Fuel Management Plan for the Stevenson Upper School Campus* dated March 2021; the *Stevenson School Tree Health & Hazard Assessment & Forest Management Plan,* dated May 2021; the *Addendum to Stevenson School Tree Health & Hazard Assessment & Forest Management Plan* dated August 2021. While these reports evaluate the campus holistically, they include recommendations the would be applicable to the Proposed Project. The following discussion summarizes the findings of those technical reports to the extent that they are applicable to the Proposed Project. The findings of these technical analyses are herein incorporated by reference consistent with the requirements of CEQA Guidelines Sec. 15150. For a more detailed discussion of biological resources, please refer to the technical reports available for review at the Monterey County HCD – Planning Office located in Salinas, California.

Regionally, the Monterey Peninsula supports a high level of endemic species. While the area surrounding the Proposed Project has been extensively developed/disturbed, strands of native habitats are present in the immediate vicinity of the Proposed Project. These areas contain or likely contain a number of special-status species. Five (5) special-status plant species were observed on the Robert Louis Stevenson School campus during the Spring 2022 surveys conducted by KMA in connection with other planned improvements on-campus. Species included Hooker's manzanita (*Arctostaphylos hookeri ssp. Hookeri*), Monterey pine (*Pinus radiata*), sandmat manzanita (*Arctostaphylos pumila*), small-leaved lomatium (*Lomatium parvifolium*), and Yadon's rein-orchid (*Piperia yadonii*). None of these species were observed in the footprint of the Proposed Project, although KMA identified Monterey Pine forest habitat immediately adjacent to the Proposed Project to the north of the site. KMA identified 26 special-status wildlife species with the potential to occur on-site, although no wildlife species were identified during any of KMA prior surveys of the site. No critical habitat is present on the Proposed Project site.

The Proposed Project site is considered developed and disturbed. As discussed previously, the Proposed Project site is improved with various improvements associated with the existing campus. The Project site contains the existing Lindsley Science Building, ornamental landscaping, and pathways. Surrounding vegetation consists primarily of Monterey pine and Coast Live oak trees. Remnant patches of Monterey pine forest exist around the perimeter of the Project site, and patches of contiguous forest are located along the northern edge of the site. Monterey pine along the northern boundary have been limbed due to pitch canker and drought, and the understory cleared for fuel management. To the west, south, and north, the Project site is surrounded by existing campus development, golf courses, and residential areas.

The Project site is located within the Seal Rock Creek watershed. KMA identified an unnamed tributary of Seal Rock Creek that passes through the north-central part of the campus. This unnamed tributary does not support any continuous cover of wetland or riparian plants and is

dominated by upland species characteristic of the surrounding Monterey pine forest. Similarly, no wetlands were identified in immediate vicinity of the Proposed Project site. The Proposed Project would not affect the unnamed tributary, nor would it affect any wetland habitat (KMA, 2023).

Biological Resources Impact (a) Less than Significant with Mitigation: The Proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species. Special status plant species are known to occur on and within the vicinity of the existing campus, as documented by KMA. However, as identified by KMA, the Proposed Project site is developed with existing infrastructure and construction would generally occur in disturbed areas. While the Proposed Project site is extensively developed, the Proposed Project does include tree removal and some construction-related activities may encroach into adjacent Monterey pine forest mapped along the northern boundary of the site (KMA, 2023). As a result, KMA recommended that mitigation measures should be implemented to ensure that potential impacts would be reduced to a less than significant level. This represents a potentially significant impact that would be reduced to less than significant with implementation of **Mitigation Measures BIO-1(a)** through **BIO – 1(b)**, **BIO – 6(a)** through **BIO – 6(c)**, and **BIO – 7(a)** through **BIO – 7(d)**.

Mitigation Measure BIO - 1(a) *Conduct seasonally timed, focused rare plant preconstruction surveys in project impact areas within and adjacent to Monterey pine forest, plus a 50-foot buffer, and document occurrences for avoidance*. A qualified botanist shall conduct surveys for project sites in which the area of disturbance and/or a 50-foot buffer from disturbance limits occur within Monterey pine forest as mapped in Figure 4 in *Stevenson School Pebble Beach Campus Monterey County, California Biological Resources Assessment for the General Development Plan Amendment Project (July 2022)*. Project sites with a 50-foot buffer that occur entirely within developed/ruderal areas would not require special-status plant surveys. The surveys shall take place during the growing season prior to construction and be timed during the vegetative growth and blooming periods (e.g., January and May/June) for Yadon's piperia. Since Hooker's manzanita is a perennial shrub, surveys for this species can occur at any time of the year. The surveys shall follow the protocols given in *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants* (USFWS 2000) and *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). The botanist should visit onsite reference populations of Yadon's piperia in Area 1 in *Stevenson School Pebble Beach Campus Monterey County, California Biological Resources Assessment for the General Development Plan Amendment Project (July 2022)* to confirm that the species was in identifiable condition at the time of the surveys. All Yadon's piperia and Hooker's manzanita plants shall be mapped and flagged for avoidance and/or salvage and relocation. A report detailing the methods and results of the surveys shall be prepared for submittal to the County. The project design should be reviewed to ensure that avoidance is the primary method considered for special-status plant protection. If construction activities cannot avoid special-status plant species, Mitigation Measure BIO-1b shall be required.

Mitigation Measure BIO – 1(a) Monitoring Action: Prior to the issuance of any construction permit, the Applicant shall submit the results of the preconstruction survey to HCD – Planning for review and approval.

Mitigation Measure BIO - 1(b) *Prepare a rare plant compensatory mitigation plan that includes the salvage and relocation of impacted rare plants.* If project development cannot avoid rare plant areas, a rare plant mitigation plan shall be prepared to detail the methods for plant salvage from the disturbance area and relocation to appropriate habitat outside of the project sites. A qualified botanist/restoration ecologist shall prepare the plan and include a suite of measures that may include digging up and moving Yadon's rein-orchid plants growing in the impact area during the growing season (i.e., winter to early spring) prior to ground disturbance, and transplanting them into areas of suitable habitat in protected open space. Hooker's manzanita shall also be included in the plan if individuals are impacted during construction. Collection of seeds/cuttings and transplanting individuals along with other approaches shall be detailed in the plan. Seeds of Hooker's manzanita may be collected, cleaned, and grown in containers within a horticultural setting and out planted in an identified mitigation area on the property. Cuttings may also be grown in containers and out planted as feasible. Any Yadon's piperia and Hooker's manzanita plants salvaged and/or propagated shall be planted in similar habitat within a designated mitigation area on the property that will be protected in perpetuity. The area of the mitigation site(s) and number of propagules to be planted shall be determined once grading and disturbance limits are finalized, and shall use a general ratio of 2:1 (i.e., two plants mitigated for every one plant impacted). The mitigation areas for rare plants can be within any site designated for mitigation of impacts on sensitive natural communities as described by KMA in *Stevenson School Pebble Beach Campus Monterey County, California Biological Resources Assessment for the General Development Plan Amendment Project (July 2022)*. The mitigation plan shall be developed by a qualified botanist/restoration ecologist and at a minimum include the following:

1. The overall goals and measurable objectives to ensure no net loss of special-status plant species;
2. Identification of specific mitigation areas on the property with appropriate environmental conditions for the target species;
3. A planting plan that includes seasonally timed salvage or seed/cutting collection; whether seeds will be directly sown into the mitigation site or grown in containers, or identification of nursery sources for container plantings; and, seeding/planting methods for the specified mitigation site(s);
4. Specific habitat management methods to be used during the establishment period following planting (e.g., seasonally timed weed abatement program and irrigation, if needed);
5. Success criteria based on the goals and objectives to ensure no net loss of the affected species on the project site;
6. Annual monitoring for at least five years to ensure that success criteria are being met (e.g., annual population census surveys and identification of monitoring reference sites, if needed);
7. Reporting requirements to ensure consistent data collection and reporting methods used by monitoring personnel; and

8. Adaptive management including remedial measures to address circumstances that may affect the program's ability to meet identified success criteria.

> **Mitigation Measure BIO – 1(b) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit a rare plant compensatory mitigation plan, if determined necessary as part of Mitigation Measure BIO – 1(a), to HCD – Planning for review and approval. If any mitigation areas are necessary, those areas shall be placed in a conservation easement.

Mitigation Measure BIO – 2(a) – *Attempt to avoid initial ground disturbance during the winter months.* Initial site disturbance and grading for construction should be planned to occur outside the winter rain season in which frogs use ephemeral stream courses and adjacent upland habitats. Construction grading along the margins of campus abutting Monterey pine forest and the unnamed tributary to Seal Rock Creek should try to occur between May 1st and November 30th to avoid impacts to frogs using upland habitat during the rainy season. If this is not feasible, Mitigation Measures BIO-2c and -2e should be followed. In any season, Mitigation Measures BIO-2b, -2d and - 2f shall be implemented because they offset project impacts on other wildlife species.

> **Mitigation Measure BIO – 2(a) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit construction drawings to HCD – Planning for review and approval that include the requirements of this mitigation measure as "Notes" on the plans.

Mitigation Measure BIO – 2(b) - *Prepare and present a Worker Environmental Awareness Program.* A qualified biologist shall prepare a Worker Environmental Awareness Program that will be presented to all project personnel. This program shall detail measures to avoid and minimize impacts on biological resources. It shall include a description of special-status species potentially occurring on the project site and their natural history; the status of the species and their protection under environmental laws and regulations; and, the penalties for take. Recommendations shall be given as to actions to avoid "take" should a special-status species be found on the project site. Aspects of the training shall include:

- Delineation of the allowable work area, staging areas, access points and limits to vehicle access;
- Locations of setback areas from streams, wetlands, and other sensitive biological resources (e.g., nests) that shall be avoided during construction. These areas shall be delineated by construction fencing and maintained throughout the project;
- Maintenance requirements for the wildlife exclusion fencing, if used (Mitigation Measure BIO-2d);
- Storage of all pipes, metal tubing, or similar materials stored or stacked on the project site for one or more overnight periods shall be either securely capped before storage or thoroughly inspected for wildlife before the materials are moved, buried, capped, or otherwise used;

- Inspection of materials stored onsite, such as lumber, plywood, and rolls of silt fence, for wildlife that may have sheltered under or within the materials;
- Use of netting to exclude birds from nesting in construction materials;
- Wildlife protection measures for excavations and trenches (Mitigation Measure BIO-2f);
- Contact information for the approved biologist and instructions should any wildlife species be detected at the work site;
- Dust suppression methods during construction activities when necessary to meet air quality standards and protect biological resources;
- Stormwater BMPs (Mitigation Measure BIO-6b); and
- Methods for containment of food-related trash items (e.g., wrappers, cans, bottles, food scraps), small construction debris (e.g., nails, bits of metal and plastic), and other human-generated debris (e.g., cigarette butts) in animal-proof containers and removal from the site on a weekly basis.

All project personnel who attended the training shall sign an attendance sheet. The program shall be repeated for any new crews that arrive subsequently on the project site.

> **Mitigation Measure BIO – 2(b) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit a Worker Environmental Awareness Program to HCD – Planning for review and approval. The Applicant shall maintain records of all attendance sheets and shall provide copies of the attendance logs to HCD – Planning upon request.

Mitigation Measure BIO – 2(c) - *Conduct California red-legged frog preconstruction surveys.* Within 48 hours prior to initial vegetation removal and ground disturbance, a qualified biologist shall survey all areas proposed for temporary and permanent disturbance for project sites within or abutting Monterey pine forest. During rain events, the preconstruction survey shall be conducted during the same day and immediately prior to the start of construction. If any California red-legged frogs are found in the work area, the animal shall be allowed to leave the work area under its own volition. If the frog does not leave the work area, the USFWS should be contacted immediately and work delayed in that area until proper authorizations have been received prior to capture and relocation. See survey reporting requirements in Mitigation Measure Bio-3a.

> **Mitigation Measure BIO – 2(c) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit the results of the preconstruction survey to HCD – Planning for review and approval.

Mitigation Measure BIO – 2(d)- *Conduct biological monitoring while the project sites are cleared and graded.* A qualified biologist shall monitor the removal of surface vegetation and initial site grading for California red-legged frogs or other species such as northern California legless lizard that could be uncovered during the work. The biologist shall view the activities from a safe distance using binoculars and walk through searching freshly disturbed soils during breaks in the work. Tree removal shall also be monitored if it involves operating vehicles in protected vegetated habitats. If any special-status species are found, work shall be delayed until the species

has/have left the work area or CDFW/USFWS shall be notified to obtain authorization for capture and relocation. If none are found during monitoring, work may proceed.

> **Mitigation Measure BIO – 2(d) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit evidence (i.e., contract) to HCD – Planning for review and approval demonstrating that the Applicant has retained a qualified biologist to conduct on-going construction phase monitoring. The Applicant shall maintain records of all daily monitoring activities and shall provide copies of all monitoring reports to HCD – Planning upon request and upon conclusion of the construction activities.

Mitigation Measure BIO – 2(e) - *Install a high-visibility construction and silt fence along the forest edge to delineate the allowable work area, exclude wildlife from the site, and protect stream habitats.* After each of the above-listed sites have been cleared of all vegetation that could provide refugia for California red-legged frogs and other wildlife, a high-visibility construction fence together with a silt fence, or an approved wildlife exclusion fence (i.e., ERTEC Triple-function E-fence), shall be erected along the forest edge to delineate the limits of grading and vehicle access. To prevent animals from getting under the fence, the bottom edge of the fence shall be trenched into the ground to a depth of at least six (6) inches, and the soil recompacted along either side. For the Fine Arts Building (K), the fence shall be erected at a minimum along the 50-foot creek setback line to prevent encroachment into the setback. The fence shall remain in place throughout all construction phases and checked weekly by construction personnel for needed maintenance. The fence shall be surveyed by a qualified biologist prior to the start of work each day in which at least one-quarter inch of precipitation has fallen within the past 24 hours for frogs that may have entered the work area or are disoriented on the outside of the fence. If any California red-legged frogs are found within the work area and the animals are not leaving the site on their own, the USFWS shall be contacted to receive authorization to move them to suitable habitat away from project impacts. If any Species of Special Concern are found, a qualified biologist shall move them out of harm's way and into suitable habitat. If a state listed species is encountered onsite, CDFW shall be contacted to receive authorization for their capture and relocation. Work shall be halted within 100 feet of the species until the agencies have provided authorization to proceed.

> **Mitigation Measure BIO – 2(e) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit photographic evidence demonstrating that high-visibility construction and silt fence along the Proposed Project's boundary has been installed. All monitoring reports prepared by the biological monitor shall identify the status of the fencing and identify any corrective actions, if necessary. The Applicant shall maintain records of all daily monitoring activities and shall provide copies of all monitoring reports to HCD – Planning upon request and upon conclusion of the construction activities.

Mitigation Measure BIO – 2(f) *Employ measures to prevent entrapment of wildlife in open excavations and trenches.* During the period in which there are open trenches or excavations more than six (6) inches deep, such as during the excavation for building foundations or utility lines, escape ramps shall be installed so that wildlife that may have become entrapped have the ability to escape. Escape ramps are to consist of a 2:1 sloped soil area leading from the bottom to ground

level. If this is not possible, a qualified biologist shall inspect open trenches each day prior to the start of work for entrapped animals. A third option is that trenches/excavations can be completely covered with plywood, steel plates or similar material during overnight periods. If a California red-legged frog is located in a trench by construction personnel, the qualified biological monitor shall be contacted immediately to assist with relocation upon authorization from USFWS. For common wildlife, the biologist shall capture and relocate the individual out of harm's way. Work shall be halted until the entrapped animal has been relocated.

> **Mitigation Measure BIO – 2(f) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit evidence (i.e., contract) to HCD – Planning for review and approval demonstrating that the Applicant has retained a qualified biologist to conduct on-going construction phase monitoring. The biological monitor shall be responsible for ensuring that measures are employed to prevent the entrapment of wildlife during construction. All monitoring reports prepared by the biological monitor shall identify whether any species were relocated. The Applicant shall maintain records of all daily monitoring activities and shall provide copies of all monitoring reports to HCD – Planning upon request and upon conclusion of the construction activities.

Mitigation Measure BIO – 3(a) - *Conduct a wildlife preconstruction survey and avoid construction in any areas with sensitive animal species.* Within 48 hours prior to the start of vegetation removal or grading, a qualified biologist shall survey permanent and temporary impact areas for special status wildlife that could occur on the property. The preconstruction survey shall be repeated for any new phase of construction to begin at a later time.

Visual surveys for wildlife should be utilized for the obscure bumble bee and sign of Monterey dusky footed woodrat, and should be coordinated with preconstruction requirements detailed in mitigation measures BIO-2, BIO-4 and BIO-5. Raking surveys in Monterey pine forest margins and adjacent landscaped areas with leaf litter under shrubs, as well as searches under logs or other cover objects, shall be done to detect northern California legless lizards that may occur within the grading footprint. Surveys for this species shall be conducted in areas deemed suitable by the qualified biologist. The entire impact area does not need to be raked, just select locations identified by the qualified biologist as having the highest potential to support legless lizards. Monitoring initial vegetation disturbance (detailed under Mitigation Measure BIO-2d) will also allow capture and relocation of legless lizards that may be unearthed from the impact area during grading.

During the surveys, understory vegetation and tree canopy within and adjacent to the development sites in Monterey pine forest habitat be visually searched for Monterey dusky-footed woodrat middens to make sure they haven't moved into a specific project area. Any woodrat middens in the impact area shall be flagged for avoidance. If development cannot avoid removal of the midden, the biologist shall determine if it is active. Signs that a nest is active are new sticks or vegetative cuttings that have been added, nest entrances and travel paths that are free of debris, and recently deposited fecal pellets. Inactivity may be determined by cobwebs across entrances, debris within the entrance, general nest deterioration, absence of fresh vegetative cuttings, or absence of fresh fecal pellets. If no woodrats occupy the midden, the biologist shall dismantle the

nest to prevent reoccupation prior to vegetation disturbance by construction equipment. If a woodrat is actively using the nest, authorization shall be obtained by the CDFW to relocate the midden and Mitigation Measure BIO-3b shall be followed. If a woodrat is observed within or fleeing from the nest while being dismantled, the nest shall be considered active and relocated using a phased approach.

Construction activities can begin once it has been determined that there are no sensitive animals within impact areas. If any individuals are found within the impact area or would otherwise be at risk during construction, work activities shall be delayed in that particular area and the animal allowed to leave the work zone on its own volition. Individuals can be relocated outside of the work area if authorization is provided by CDFW, or USFWS for federally listed species such as the California red-legged frog. The biologist shall monitor the area to determine when individuals of special-status species have left and work can commence. The biologist shall submit a report detailing the methods and results of the wildlife preconstruction survey to the County. The report should detail any sensitive species found during the survey and measures taken for their avoidance. Observations of special-status species shall be submitted to the CNDDB.

> **Mitigation Measure BIO – 3(a) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit the results of the preconstruction survey to HCD – Planning for review and approval.

Mitigation Measure BIO – 3(b) - *Relocate woodrat midden materials to a suitable open space area immediately outside of project impact limits.* The qualified biologist shall determine potentially suitable habitat for Monterey dusky-footed woodrats within an appropriate distance that the woodrats can access outside of the project impact area (e.g., 100 to 200 feet away from the existing nest). Nest dismantling for active nests should follow this phased approach:

1. Remove 50 to 100% of the existing canopy and partially dismantle the nest. Move the nest materials to the designated relocation site and arrange in piles potentially suitable for woodrat habitation or refugia.
2. Wait for two to four days to allow woodrats to vacate the nest on their own.
3. Thereafter, the nest can be dismantled by hand over two to three days. Move the materials to the relocation site.
4. If young are found during dismantling, activities shall cease for at least 48 hours to allow the adult to move the young. The biologist shall inspect the nest to determine whether young are still present. If the young have not been moved, it shall be left undisturbed for another 48-hour period and then re-checked. This shall be repeated until the young are no longer present and then dismantling can continue.
5. A report detailing relocation activities shall be prepared by the biologist for submittal to the County and CDFW. The report shall include: dates, times and weather conditions during the relocation work; names of biologists involved; number of nests found and status; summary of work conducted; number of woodrats observed and any injuries or mortalities; representative

photographs of the relocation work, including relocation site; and, GPS coordinates of relocation site.

The biologist and any crews involved in the relocation of woodrat middens should use appropriate personal protective equipment, such as N95 face mask and gloves. Tyvek suits would be needed in areas with dense poison oak.

> **Mitigation Measure BIO – 3(a) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit evidence to HCD – Planning demonstrating that a qualified biologist has relocated woodrat midden materials, if identified during the preconstruction surveys described in Mitigation Measure BIO – 3(a), to a suitable open space area outside of the project impact area.

Mitigation Measure BIO – 4(a) - *If possible, conduct the initiation of construction activities outside of the nesting season.* All initial site disturbance should be limited to the time period between September 1st to November 15th, if feasible. Tree removal should occur between September 1st and January 31st to avoid the nesting period. If vegetation removal and grading cannot be conducted during this time period, then implementation of Mitigation Measure BIO-4b is required.

> **Mitigation Measure BIO – 4(a) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit construction drawings to HCD – Planning for review and approval that include the requirements of this mitigation as "Notes" on the plans.

Mitigation Measure BIO – 4(b)- *Conduct a preconstruction nesting bird survey and avoid active nests.* For any initial construction scheduled to start between February 1st and August 31st, a qualified biologist shall conduct a preconstruction survey for nesting birds within a 500-foot buffer of project impact areas. The survey shall be conducted within seven days before the initiation of construction activities for any phase of the project occurring within the nesting season. During this survey, the qualified biologist shall search for birds exhibiting nesting behavior and inspect all potential nest substrates in the impact and buffer areas. Any nests identified will be monitored to determine if they are active. If no active nests are found, construction may proceed. If an active nest is found within 50 feet (250-500 feet for raptors) of the construction area, the biologist, in consultation with CDFW and the County as appropriate, shall determine the extent of a buffer to be established around the nest. The buffer will be delineated with flagging, and no work shall take place within the buffer area until the young have left the nest, as determined by the qualified biologist. Implementation of these mitigation measures would reduce project effects on protected nesting birds to a level below significance.

> **Mitigation Measure BIO – 4(b) Monitoring Action:** No more than seven days before the initiation of construction-related activities during the nesting season, the Applicant shall submit the results of a preconstruction nesting bird survey, prepared by a qualified biologist, to the HCD – Planning for review and approval.

Mitigation Measure BIO – 5 - *Conduct a search for tree cavities and buildings that could be used by roosting bats, and if found, conduct an exit survey for roosting bats and install exclusion devices.* Within seven days prior to the start of construction, a qualified biologist shall survey the trees within 50 feet of the limits of disturbance for tree cavities that can be used by bats. Buildings to be removed or impacted should also be assessed. If no such cavities or areas of guano are found, work may proceed. Any potentially suitable cavities or structures showing evidence of bat activity (i.e., guano piles, urine stains, prey remains) shall be monitored by a qualified biologist during the evening to determine whether bats leave for foraging. The cavities should be monitored from at least one hour before sunset, and viewed with the aid of binoculars. If any bats are observed leaving roost sites, the biologist shall coordinate with the County and CDFW on appropriate methods to ensure the exclusion and successful relocation of individuals to suitable habitat nearby. The qualified biologist shall determine whether a maternity roost is present by carefully observing individuals on the roost. It is possible that a mirror on a pole and/or a fiber optic scope may be used. If young are present, construction shall be delayed until they have matured and can fly on their own. When it has been determined that no young are present, the biologist shall monitor the roost in the evening when the bats leave to forage and then install bat exclusion netting over the opening. The netting shall be inspected the following morning to ensure that no bats have become entangled in the netting and that none remain inside the cavity. The netting shall remain in place on trees to remain until construction disturbance has ceased. The qualified biologist shall monitor the removal of any trees with bat exclusion netting. If any bats are found, work shall be halted until measures are taken to effectively exclude the bats.

> **Mitigation Measure BIO – 5 Monitoring Action:** No more than seven days before the initiation of construction-related activities, the Applicant shall submit the results of a preconstruction bat survey, prepared by a qualified biologist, to the HCD – Planning for review and approval.

Mitigation Measure BIO - 6(a) *Maintain a minimum 50-foot setback from the unnamed tributary to Seal Rock Creek.* All temporary and permanent disturbance areas shall be located outside of the creek setback area to the extent feasible. A 50-foot setback on the southwest side of the tributary was deemed adequate to maintain current land use practices on the campus while protecting the drainage corridor and surrounding habitat. Other BMPs shall be installed as appropriate under the direction of a qualified individual. If temporary disturbance encroaches into this area, trees and any special status plants shall be avoided to the maximum extent feasible. Maintaining a minimum 50-foot setback area along with a suite of appropriate BMPs will also protect the creek from stormwater runoff and potential impacts to water quality from project-related construction activities.

> **Mitigation Measure BIO – 6(a) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit construction drawings to HCD – Planning for review and approval that include a 50-foot setback from the southwest side of the unnamed tributary. No construction-related activities shall occur within the setback.

Mitigation Measure BIO - 6(b) *Install appropriate erosion and sediment controls.* For any project element in which the limits of disturbance are in general watershed of the Seal Rock Creek tributary, the following BMPs are required to be implemented during and after the construction phases of the project to protect forested habitat and water quality.

1. A Sediment and Erosion Control Plan may be required by the County, and shall be prepared by a qualified professional. The use of silt fence, straw wattles, erosion control blankets, straw bales, sandbags, fiber rolls and other appropriate techniques should be employed to protect the drainage features on and off the property. Biotechnical approaches using native vegetation shall be used as feasible. All areas with soil disturbance shall have appropriate erosion controls and other stormwater protection BMPs installed per the engineer's requirements and in place prior to October 15. These measures shall be maintained in good operating condition throughout the construction period. Methods that are not biodegradable should be removed after vegetation has become established and following the end of the rainy season (late-spring or summer).
2. Spill kits shall be maintained on the site, and a Spill Response Plan shall be in place.
3. No vehicles or equipment shall be refueled within 50 feet of drainage features unless a bermed and lined refueling area is constructed. No vehicles or construction equipment shall be stored overnight within 100 feet of these areas unless drip pans or ground covers are used. All equipment and vehicles should be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills. Construction staging areas should attain zero discharge of stormwater runoff into these habitats.
4. No concrete washout shall be conducted on the site outside of an appropriate containment system. Washing of equipment, tools, etc. should not be allowed in any location where the tainted water could enter onsite drainages.
5. The use of chemicals, fuels, lubricants, or biocides shall be in compliance with all local, state, and federal regulations. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other state and federal legislation.
6. All project-related spills of hazardous materials within or adjacent to the project site should be cleaned up immediately.
7. Areas with temporarily disturbed soils shall be restored under the direction of the project engineer in consultation with a qualified restoration ecologist as needed. Methods may include recontouring graded areas to blend in with existing natural contours, covering the areas with salvaged topsoil containing native seedbank from the site, and/or applying the native seed mix shown on the project plans supplemented with species in Table 1 below. Native seed mix shall be applied to the disturbed areas through either direct hand seeding or hydroseeding methods. Seeding with the erosion control native seed mix should be provided on all disturbed soil areas prior to the onset of the rainy season (by October 15). Planting of trees or shrubs can also be used in temporarily disturbed areas, as appropriate, and incorporated into the habitat restoration and/or management plan for protected open space as described in Mitigation Measure BIO-6e.
8. The temporarily disturbed areas shall be inspected by the qualified professional and restoration ecologist to ensure that disturbed soils have been stabilized in the short- and long-term.

Restoration of temporarily disturbed areas should also include the removal of non-native species that favor disturbed conditions and outcompete native species.

Table 1. Erosion Control Native Seed Mix	
Species	**Application Rate (lbs./acre)**
Bromus carinatus (California brome)	10
Elymus glaucus (blue wild rye)	5
Trifolium wildenovii (tomcat clover)	5
Vuplia microstachys (six weeks fescue)	5
Total	**25**

Mitigation Measure BIO – 6(b) Monitoring Action: Prior to the issuance of any construction permit, the Applicant shall submit construction drawings to HCD – Planning for review and approval that include these measures as "Notes" on the plans.

Mitigation Measure BIO – 6(c) *a Habitat Management Plan (HMP) for protected Monterey pine forest.* An HMP shall be prepared by a qualified ecologist that details specific goals for habitat values in protected open space. The plan shall describe the methods to manage the site to attain those goals, and include adaptive management guidelines if those goals are not being met. The HMP shall address the following components: protection and enhancement of the creek corridor; removal of non-native plant species; and, specific planting areas that can be used for compensatory mitigation for Proposed Project impacts on Monterey pines and special-status plant species. The open space area to be used for mitigation shall have designated areas to be used for replacement plantings of Monterey pines for project elements that will impact Monterey trees and detail other landscape areas that may also be used for replanting efforts. The HMP should map and describe the identified mitigation areas and the methods to be employed for habitat enhancement and sensitive plant species establishment. A funding source shall be identified that will provide for management under the plan in perpetuity. The HMP should at a minimum include the following:

1. The overall goals and measurable objectives to reduce non-native species cover and promote native species;
2. Identification of areas for habitat enhancement, in which non-native species will be removed to allow natural establishment of native forbs and shrubs that will produce flowers and other food sources for wildlife, as well as areas along the stream channel that can be enhanced;
3. A special-status plant species seeding and/or planting plan that includes seasonally timed seed collection or salvage of rare plant species from the project impact areas, and identification of appropriate receiver site locations;
4. Long-term management of retained Monterey pine forest including any rare plant compensatory mitigation sites;
5. Management of Monterey pine planting sites and measures to remove/replace diseased trees;
6. Annual surveys to assess non-native plant species control needs and appropriate methods;
7. Adaptive management involving remedial measures to address circumstances that may affect the program's ability to meet identified success criteria, such as drought, herbivory, trespass, or wildfire;

8. Specific management objectives and methods for special-status wildlife, such as retention of large woody debris to provide cover for California red-legged frog and northern California legless lizard as well as standing dead trees with cavities for bat roost sites and cavity-nesting birds;
9. Educational resources such as signage or an interpretive trail to enhance students' and the public's experience visiting the conservation area and provide information to enhance its protection from trespass or vandalism; and
10. A reporting program to be implemented by a qualified biologist for a minimum of five years to ensure the measures in the HMP are being followed and goals and objectives are met.

Any open space area used for mitigation should be protected in perpetuity from further development or other land uses not conducive to the protection of Monterey pine forest habitat. The easement shall incorporate restrictive language that permanently prohibits all future development in the open space area. The open space shall be guaranteed through an entitlement such as a conservation easement or specific deed restrictions to be placed on the area of land in perpetuity. The protected open space area shall be managed by the applicant under the HMP and funding must be assured for its implementation.

> **Mitigation Measure BIO – 6(c) Monitoring Action:** Prior to a final on the construction permit for the new building, the Applicant shall submit an HMP to HCD – Planning for review and approval.

Mitigation Measure BIO – 7(a) *Conduct a tree inventory (or update the existing inventory) and minimize tree removal to the extent possible*. The tree inventory performed by Thompson Wildland Management shall be updated as needed once final construction limits are confirmed. If needed a new inventory should be performed by a qualified arborist for any native trees that are within 30 feet of the limits of disturbance prior to the development of each project element that have not already been surveyed. This area is to include areas to be maintained for fire clearance. The limits of disturbance shall be staked in the field under the direction of the project engineer prior to the tree inventory. The inventory shall document each of the native trees that are at least six (6) inches diameter at breast height ("dbh"). Each tree shall be identified to species, assigned a unique number, and dbh measured for each trunk or major (>3 inch) branch that splits below approximately 4.5 feet. An aluminum tag imprinted with the identifying number should be affixed to the north side of the tree at approximately four (4) feet above the ground. The locations of each tree shall be recorded using a Global Positioning System with submeter accuracy or located by a licensed surveyor. Each native tree should be depicted on a map and identified to species, size and condition. The arborist shall work with the project engineer to minimize the number of native trees to be removed. A tree health and hazard assessment shall be completed by the arborist at each project site to determine hazard trees to be removed and management recommendations that will assist in preserving the viability of remaining trees. The disposition of each tree (remove/remain) shall be depicted on site plans. Trees to be removed shall be identified in the field using flagging tape or other easily identifiable means.

Mitigation Measure BIO – 7(a) Monitoring Action: Prior to the issuance of any construction permit, the Applicant shall submit an updated tree inventory and tree health and hazard assessment to HCD – Planning for review and approval.

Mitigation Measure BIO – 7(b) *Employ a certified arborist for native tree trimming.* The applicant shall employ the services of a certified arborist to oversee any trimming or removal of trees as necessary for clearance. The arborist shall record the number of native trees that require extensive trimming (i.e., over 30% of the canopy), and incorporate these trees into the mitigation plan and FMP.

Mitigation Measure BIO – 7(b) Monitoring Action: Prior to the issuance of any construction permit, the Applicant shall submit evidence (i.e., contract) to HCD – Planning for review and approval demonstrating that the Applicant has obtained a qualified arborist to monitor proposed tree trimming and removal activities.

Mitigation Measure BIO – 7(c) *Install protective fencing around trees to remain.* Within two weeks prior to the initiation of work at each project site, protective measures shall be installed around native trees that are to remain undisturbed but are in close enough proximity to the work that they could be impacted. In compliance with the DMF LUP Policy 33, the trunks of protected trees shall be wrapped with suitable materials (e.g., 2X4 lumber forming a protective barrier around the lower trunk, secured with rope and wrapped with high visibility construction fencing) to prevent inadvertent damage from construction equipment. The grading and construction limits should be clearly marked with construction fence that defines the work area and protects critical root zones. No construction tools, materials or equipment shall be stored in the critical root zone of trees to remain, and no washing of construction substances shall occur. The certified arborist shall work with the project engineer and grading contractor to provide information on how to avoid and minimize impacts of fill and/or grading within the critical root zone and tunneling under major roots for utility trenches. Natural forest topsoils are to be retained to the extent feasible during and post construction using soil stabilization and sedimentation control measures.

Mitigation Measure BIO – 7(c) Monitoring Action: Prior to the issuance of any construction permit, the Applicant shall submit photographic evidence to HCD – Planning for review and approval demonstrating that the Applicant has installed protective fencing around trees to remain.

Mitigation Measure BIO – 7(d) *Replace trees removed according to the Forest Management Plan.* In accordance with Policy 35 of the DMF LUP, native trees that are removed shall be replaced on the site in accordance with the recommendations of the approved Forest Management Plan. Replacement trees shall be of the same species and maintained in good condition. Tree removal permits from the County require that native tree species at least six (6) inches dbh be replaced at a 1:1 ratio. Replacement trees should be acquired from a local native plant nursery and consist of healthy specimens that are free from physiological and structural disorders. Planting areas shall be identified and may include the suitable landscape areas, the Area 1 site or a previously used mitigation site around the upper athletic field that has room for additional

plantings. Planting shall occur during the appropriate time of year and using proper techniques to insure at least 80% survival after two years (Thompson Wildland Management 2020).

> **Mitigation Measure BIO – 7(d) Monitoring Action:** Prior to the issuance of any construction permit, the Applicant shall submit a replanting plan demonstrating the location, type, and size, of all proposed replacement trees consistent with the requirements of this mitigation measure. The replanting plan shall also detail annual monitoring requirements to insure the successful replanting of native trees. The replanting plan shall also identify any potential corrective actions, including the installation of additional replacement trees, if monitoring indicates that tree replacement has not been successful.

Biological Resources Impact (b) and (c) Less than Significant: The Proposed Project would not have a substantial adverse effect on any riparian habitat or wetlands. As previously discussed, the Project site is located within the Seal Rock Creek watershed. KMA identified that an unnamed tributary of Seal Rock Creek passes through the north-central part of the campus. As identified by KMA, the Proposed Project would not adversely affect this unnamed tributary. Construction-related activities would not encroach upon the tributary and would not encroach upon the recommended 50-foot buffer along the tributary identified by KMA. Moreover, KMA did not identify any wetlands near the Proposed Project. As a result, the Proposed Project would not have an adverse impact on any riparian or wetland habitat. This represents a less than significant impact.

Biological Resources Impact (d) Less than Significant with Mitigation: The Proposed Project would not have a substantial adverse effect on any native resident or migratory fish or wildlife species. The Proposed Project site is developed and disturbed. Moreover, construction and operation would not be located within 50 feet of the Seal Rock Creek tributary. While KMA determined that no suitable breeding habitat for California red legged frog exists in the Project vicinity, construction activities during the winter could potentially impact migrating juveniles. As a result, KMA recommended mitigation to ensure that potential impacts would be avoided and reduced to a less than significant level. The implementation of **Mitigation Measures BIO – 6(a)** through **BIO – 6(c)** identified above would ensure that all impacts would be reduced to a less than significant level.

Biological Resources Impact (e) Less than Significant with Mitigation: Monterey County Code Section 16.60.040(a) prohibits the removal of trees without a tree removal permit. The Project includes the removal of four (4) Monterey Pine, 11 Coast Live oak trees, and one (1) Monterey Cypress tree. Tree removal within the Robert Louis Stevenson Upper Campus was previously evaluated by Thompson Wildland Management in 2021. A tree health and hazard assessment concluded that 148 Monterey Pine trees were recommended for removal due to significant physiological and/or structural disorders compromising their health (Thompson Wildland Management, May 2021). The four (4) Monterey pine trees proposed for removal for the Proposed Project were included in that evaluation. KMA identified mitigation to ensure that potential impacts associated with proposed tree removal would be minimized to a less than significant level. Specifically, the Proposed Project would implement **Mitigation Measures BIO-7(a)** through **BIO**

– 7(d) to reduce this impact to less than significant. This represents a potential significant impact that would be reduced to a less than significant level through mitigation.

Biological Resources Impact (f) No Impact: The Proposed Project would have no impact on an adopted habitat conservation plan or other approved local, regional, or state habitat conservation plan affecting the subject property.

5. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (sources: 6,7, 26)	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (sources: 6,7, 26)	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries? (sources: 6,7, 26)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The following discussion is based on the results of the 2016 Preliminary Archaeological Assessment Report at the Robert Louis Stevenson School. The report was prepared by Gary S. Breschini of Archaeological Consulting. Archaeological Consulting conducted background research which included a records search of the Northwest Information Center of the California Historical Resources Information System. An extensive files and maps search was also conducted to support the evaluation. A field assessment was conducted by Archaeological Consulting on July 13th and 21st of 2016.

Cultural Resources Impact (a) No Impact: CEQA Guidelines Sec. 15064.5 defines a historical resource as one being listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources. Public Resources Code Section 21084.1 states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. The Project does not contain a historical resource nor is the Project located near a historical resource. As a result, the Project did not have an impact to historical resources.

Cultural Resources Impact (b) Less than Significant: No known or previously recorded archeological sites are located in or immediately adjacent to the Robert Louis Stevenson School, including the Proposed Project site. Additionally, the field reconnaissance conducted in July 2016 did not find surface evidence of potentially significant historic period archaeological resources. Furthermore, the Proposed Project site is previously disturbed and developed with existing

academic structures and related improvements with the Robert Louis Stevenson School campus (i.e., Lindsley Science Building, pathways). Construction would occur within the existing footprint of the Lindsley Science Building. Although disturbance to archaeological resources is unlikely, construction activities could potentially impact a previously unknown or buried archaeological resource. Implementation of standard Monterey County Condition of Approval PD003(A), which requires that work halt immediately in the event that a cultural, archaeological, historical, or paleontological resource is uncovered during construction would ensure that potential impacts related to the inadvertent discovery of a previously unknown resource would be less than significant.

Cultural Resources Impact (c) Less than Significant: No human remains, including those interred outside of a formal cemetery, are known to occur on the Proposed Project site. The Proposed Project would occur on a previously developed site that was extensively disturbed in connection with the construction of the existing Lindsley Science building. As a result, it is unlikely that any human remains would be encountered during construction. Nevertheless, while unlikely, the Proposed Project could impact previously unknown human remains. The implementation of standard Monterey County condition of approval requiring that work halt in the event of the discovery of any human remains would ensure that impacts would be less than significant. This condition further requires that no excavation or ground-disturbing activities shall occur at the site or nearby area until the Monterey County coroner has been contacted in accordance with §7050.5 of the California Health and Safety Code. If the coroner determines that the human remains are of Native American origin, the appropriate Native American tribe shall be contacted to provide recommendations for the disposition of the remains. Work will not resume in the immediate area of the discovery until such time as the remains have been appropriately removed from the site. This represents a less than significant impact.

6. ENERGY **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (sources: 6,7,8)	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (sources: 6,7,8)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Pacific Gas & Electric ("PG&E") is the primary electric and natural gas service provider in Monterey County. In 2018, all PG&E customers within Monterey County were enrolled in Central Coast Community Energy ("3CE"), formally known as Monterey Bay Community Power. 3CE is a locally controlled public agency providing carbon-free electricity to residents and businesses.

3CE works through PG&E who provides billing, power transmission and distribution, grid maintenance service and natural gas to customers.

Energy Impact (a) and (b) Less than Significant: The Proposed Project would not result in a potentially significant environmental effect due to the wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during construction or operation. The construction of the Project would require energy for the procurement and transportation of materials, and preparation of the site (e.g., minor grading, materials hauling). Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these activities. The construction energy use has not been quantified; however, the construction would not cause inefficient, wasteful, or unnecessary consumption of energy because 1) the construction schedule and process is designed to be efficient to avoid excess monetary costs, and 2) energy use required to complete construction would be temporary in nature.

Operation of the Proposed Project would not result in a significant increase in energy beyond existing energy demand associated with the Lindsley Science Building. Moreover, construction of the new education building would be required to comply with current California Building Code that set energy efficiency standards for residential and nonresidential buildings (Title 24, Part 6). Additionally, the Project would be required to comply with the California Green Building Standards Code ("CalGreen") which establishes mandatory green building standards for all buildings in California. The Proposed Project also includes energy efficient upgrades, including PV arrays, energy efficient windows, and similar improvements. For these reasons, this represents a less than significant impact.

7. GEOLOGY AND SOILS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause 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? (sources: 6,7,18,27) Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking? (sources: 6,7,18,27)	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction? (sources: 6,7,18,27)	☐	☐	☒	☐
iv) Landslides? (sources : 6,7,18,27)	☐	☐	☒	☐

7. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil? (sources: 6,7,18,27)	☐	☐	☒	☐
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? (sources: 6,7,18,27)	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Chapter 18B of the Uniform Building Code (1994), creating substantial risks to life or property? (sources: 6,7,17,18,24,27)	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (sources: 6,7,18,27)	☐	☐	☐	☒
f) Directly or indirectly destroy a paleontological resource or site or unique geologic feature? (6,7,28)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Haro, Kasunich and Associates, Inc. ("HKA") prepared a geotechnical investigation for the Proposed Project. The following discussion is based on the findings of that analysis.

Seismicity and Fault Zones

The geologic structure of central California is primarily a result of tectonic events during the past 30 million years. Faults in the area are believed to be a result of movements along the Pacific and North American tectonic plate boundaries. The movements along these plates are northwest-trending and largely comprised of the San Andreas Fault system. Monterey's complex geology is a result of changes in sea level and tectonic uplifting. Geologic units in the region have been displaced by faulting and folding. Granitic basement and overlying tertiary deposits have been juxtaposed along many of the northwest/southeast-trending faults.

The Project is located off Forest Lake Road, in Pebble Beach, California. Potential geotechnical hazards include seismic shaking, ground surface fault rupture, liquefication, and landsliding. The Project is in a seismically active region with mapped faults that have the potential to generate earthquakes that could significantly affect the Project. The most active fault nearest to the Project is the San Andreas fault located approximately 28 miles northeast. Less reliable rupture faults (i.e.,

less active and with lesser intensity) near the Project include the Cypress Point Fault located about 0.6 miles southeast and the Hatton Canyon Fault located one (1) mile northwest of the Project site.

Soils

The Natural Resources Conservation Service ("NRCS") characterizes soils within the Project site as mostly *Narlon loamy fine sand,* a typical soil type found in coastal central California. The typical profile is loamy sand, sometimes clayey with a light brownish gray to pale brown color. These soils are typically found on partially dissected terraces of slopes at elevations of 20 to 800 feet. These soils are typically associated with climate that is dry with cool rainless foggy summers and cool moist winters. Drainage and/or permeability is "somewhat poorly to poorly drained" and have "slow to medium runoff" and moderate erosion (NRCS, 2023 and Monterey County, 2023).

Geology and Soils Impact (a.i) No Impact: The Proposed Project is not located within any of the Alquist-Priolo Earthquake Fault Zones established by the Alquist-Priolo Earthquake Fault Zone Act of 1972. No impact would occur.

Geology and Soils Impact (a.ii) Less than Significant: While the Proposed Project is not located in an Alquist-Priolo Earthquake Fault Zone, the Project site is located within a region that is seismically active. Due to the proximity of the Proposed Project to active and potentially active faults, there is the potential for strong seismic shaking at the site during the structures design lifetime. While the Proposed Project could be exposed to seismically induced hazards, the Proposed Project would be required to comply with California Building Code seismic design standards (HKA, 2022). In addition, the final design of the Proposed Project would be required to comply with the recommendations of a design-level geotechnical analysis. As a result, potential impacts due to seismic hazards would be minimized. This represents a less than significant impact.

Geology and Soils Impact (a.iii) Less than Significant: The Project site is located in an area of low landslide susceptibility; the Project site is moderately flat and previously developed with existing educational uses. As a result, it is unlikely that the Proposed Project would be exposed to potential landslide related hazards. Moreover, the Proposed Project would be required to comply with the recommendations of a design-level geotechnical analysis. This represents a less than significant impact.

Geology and Soils Impact (a.iv) Less than Significant: Liquefaction susceptibility at the Project site is also low (HKA, 2022 and Monterey County, 2023). As a result, it is unlikely that the Proposed Project would be exposed to potential liquefaction-related hazards. Moreover, the Proposed Project would be required to comply with the recommendations of a design-level geotechnical analysis thereby ensuring that potential impacts would be minimized. This represents a less than significant impact.

Geology and Soils Impact (b) Less than Significant: The Proposed Project is located in an area identified as having moderate erosion. Grading and excavation could result in localized erosion onsite. However, the Proposed Project would implement standard construction BMPs intended to minimize potential erosion-related effects and would also be required to implement standard

erosion control measures during construction. Similarly, the Proposed Project would be required to implement the recommendations of design-level geotechnical analysis to further ensure that erosion impacts would be minimized. Finally, the Proposed Project would also be required to comply with standard County conditions of approval related to grading restrictions, as well as comply with the requirements of MCC Chapter 16.08 and 16.12. The implementation of standard construction BMPS, in addition to adhering to applicable MCC requirements, would ensure that impacts would be minimized. This represents a less than significant impact.

Geology and Soils Impact (c) and (d) Less than Significant: Soils within the Project site have low liquefication susceptibility. The Project site is also not located in a known subsidence zone; therefore, it is unlikely that the Project would be subject to subsidence related hazards. While the Project site is in a seismically active region surface rupture and lateral spreading are unlikely (HKA, 2022). HKA performed subsurface investigation and found that the Project site was located atop five (5) feet of surficial soil over hard weathered granitic bedrock. HKA found that the upper two 2 to five (5) feet of soil had moderate to high expansion potential, which could result in differential movement if not addressed during design and construction. Perched groundwater was also encountered. To address potential impacts from the site's geology and soil characteristics, HKA provided recommendations regarding use of conventional spread footing foundations, slab-on-grade ground basement flooring, waterproofing and drainage measures. HKA found that the site was suitable for development provided the Proposed Project incorporated the recommendations made in the Geotechnical Investigation. Moreover, as noted above, the final design of the Proposed Project will be required to comply with the recommendations of a design-level geotechnical analysis. This would ensure that potential impacts would be minimized. This represents a less than significant impact.

Geology and Soils Impact (e) No Impact: The Proposed Project is served by the Pebble Beach Community Services District for sewer services. Therefore, the Proposed Project would not result in an adverse impact related to site soils being incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. The Project would have no impact.

Geology and Soils Impact (f) No Impact: Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, and diagnostically or stratigraphically important, as well as those that add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally. They include fossil remains of large to very small aquatic and terrestrial vertebrates, remains of plants and animals previously not represented in certain portions of the stratigraphy, and assemblages of fossils that might aid stratigraphic correlations – particularly those offering data for the interpretation of tectonic events, geomorphic evolution, paleoclimatology, and the relationships of aquatic and terrestrial species. Most of the fossils found in Monterey County are of marine life forms and form a record of the region's geologic history of advancing and retreating sea levels. A review of nearly 700 known fossil localities within the County was conducted by paleontologist in 2001; 12 fossil sites were identified as having outstanding scientific value. The Project site is not located on or near any of those sites. No impact would occur.

8. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Source: 9,10)	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Source: 9,10)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Various gases in the earth's atmosphere, when exceeding naturally occurring or 'background' levels due to human activity, create a warming or greenhouse effect, and are classified as atmospheric greenhouse gases ("GHGs"). These gases play a critical role in determining the earth's surface temperature. Solar radiation enters the atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, the radiation that otherwise would have escaped back into space is retained, resulting in a warming of the atmosphere known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect, or climate change, are carbon dioxide ("CO_2"), methane ("CH_4"), ozone ("O_3"), water vapor, nitrous oxide ("N_2O"), and chlorofluorocarbons ("CFCs"). Human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for the greenhouse effect. In California, the transportation sector is the largest emitter of GHGs.

MBARD has not yet adopted a threshold for construction related GHG emissions but recommends utilizing thresholds set by neighboring districts (e.g., Sacramento Metropolitan Air Quality Management District ["SMAQMD"]). SMAQMD adopted an updated threshold based on the 2030 target year in April 2020. According to SMAQMD, a Project would result in a significant GHG related impact if the Project would emit more than 1,100 metric tons of Carbon Dioxide equivalent-CO_2e ("MTOCO_2e") per year. Operation of a stationary source project would not have a significant GHG impact if the project emits less than 10,000 MTOCO_2e.

Greenhouse Gas Emissions (a) Less than Significant: The Project is in the NCCAB, where air quality is regulated by MBARD. As discussed above, if a project emits less than 1,100 MTOCO_2e per year, its GHG emissions impact would be less than significant. The Proposed Project would generate temporary construction-related GHG emissions during demolition of the existing Lindsley science building and the construction of the new education building. Any potential effects from GHG generation during construction would be short-term and temporary.

Operation of the Proposed Project would not generate GHG emissions beyond existing levels. The Proposed Project consists of the demolition and subsequent replacement of an existing academic building. The Proposed Project would also be required to comply with current building code requirements and includes energy efficient improvements (e.g., PV arrays, windows, etc.) which would further ensure that potential operational energy demand would be minimized. Moreover, as noted above, the Proposed Project would not result in an increase in operational traffic trips and would not increase overall on-campus student population. As a result, the Proposed Project would not substantially increase GHG emissions beyond existing levels associated with current use. This represents a less than significant impact.

Greenhouse Gas Emissions (b) Less than Significant: As described above, the Project is not expected to generate GHG emissions that would exceed applicable thresholds. Therefore, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. This represents a less than significant impact.

9. HAZARDS AND HAZARDOUS MATERIALS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (sources: 6,7,8,20,24)	☐	☐	☒	☐
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? (sources: 6,7,8,24)	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (sources:6,7,8,24)	☐	☐	☐	☒
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? (sources:6,7,8,20)	☐	☐	☐	☒
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 or excessive noise for people residing or working in the project area? (sources: 6,7,8)	☐	☐	☐	☒

9. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (sources: 6,7,8,19,24)	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (sources: 6,7,16)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. Hazardous materials and waste can result in public health hazards if improperly handled, released into the soil or groundwater, or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer.

The Hazardous Waste and Substances Site ("Cortese") List is a planning tool used by the state, local agencies, and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. California Government Code Section 65962.5 requires the California EPA ("CalEPA") to develop at least annually an updated Cortese List. Various state and local government agencies are required to track and document hazardous material release information for the Cortese List. There are no hazardous materials release sites in the vicinity of the Project site. Similarly, according to the California Department of Toxic Substances Control's ("DTSC") EnviroStor database, there are no contaminated sites within the vicinity of the Project.

Hazards and Hazardous Materials Impact (a) Less than Significant: The Proposed Project would entail the use of hazardous materials (e.g., fuel, cleaning materials, etc.) during construction and operation. The types and amounts of hazardous materials used would vary according to the type of activity. It is unlikely that construction of the Project would create a significant impact due to the routine transport, use, or disposal of hazardous materials in part due to the size of the Project and the temporary nature of construction. Hazardous materials would be handled and stored in compliance with all local, state, and federal regulations pertaining to hazardous materials. In addition, the Proposed Project would implement standard BMPs and erosion control measures (e.g., minimize grading, re-vegetate disturbed areas, etc.) that would minimize potential impacts associated with the Project. The implementation of these measures would ensure that impacts would be less than significant.

Operation of the Proposed Project would entail the use of hazardous materials. Hazardous materials would be handled and stored in compliance with all local, state, and federal regulations pertaining to hazardous materials. Furthermore, any hazardous materials would be limited in quantity and concentrations set forth by the manufacture and/or applicable regulations. The Proposed Project, as a standard condition of approval, would be required to prepare a Hazardous Materials Business Response Plan to ensure that potential impacts associated with hazardous materials usage for educational purposes would be minimized. Therefore, this represents a less than significant impact.

Hazards and Hazardous Materials Impact (b) Less than Significant with Mitigation: The Proposed Project includes demolition of the existing Lindsley Science Building. The existing structure was originally constructed in 1968. Prior to the enactment of federal regulations limiting their use in the late 1970s, asbestos containing materials ("ACM") and/or lead-based paint ("LBP") were often used in construction. ACMs are mineral fibers that were historically added to various materials to strengthen them and to provide heat insulation and fire resistance. If disturbed, ACM may release asbestos fibers that can be inhaled into the lungs. Breathing high levels of asbestos can lead to increased risk of lung cancer, including mesothelioma and asbestosis. ACMs that would crumble easily if handled, or that have been sawed, scraped, or sanded into powder, are more likely to create a health hazard. ACM is most commonly found in insulation, roofing, siding shingles made of asbestos cement, and textured paints. Lead is a highly toxic metal that was used for many years in products found in and around our homes. Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. The primary source of lead exposure is deteriorating LBP. Lead dust can form when LBP is dry scraped, dry sanded, or heated. Dust also forms when painted surfaces bump or rub together. Lead-based paint that is in good condition is usually not a hazard.

Due to the age of the existing Lindsley Science Building, the structure could potentially contain ACM and/or LBP. Demolition of this structure could release ACM or LBP. This may pose a potential health risk to people if these materials are not properly handled and disposed of. This potentially significant impact would be reduced to a less than significant level through the implementation of **Mitigation Measures HAZ – 1** and **HAZ – 2** below.

Mitigation Measure HAZ – 1: Prior to demolition activities, the Lindsley Science Building shall be sampled as part of an asbestos survey in compliance with the National Emission Standards for Hazardous Air Pollutants ("NESHAP"). If asbestos is found, asbestos-related work, including demolition, involving 100 square feet or more of asbestos containing materials ("ACMs") shall be performed by a licensed asbestos abatement contractor under the supervision of a certified asbestos consultant and asbestos shall be removed and disposed of in compliance with applicable State laws. Regardless of whether asbestos is identified, prior to demolition the Air Pollution Control District ("APCD") shall be notified and an APCD Notification of Demolition and Renovation Checklist shall be submitted to both APCD and the HCD– Planning. Prior to demolition, the applicant shall retain a qualified asbestos abatement contractor to conduct an asbestos survey and remove any asbestos in compliance with applicable state laws.

Mitigation Measure HAZ – 1 Monitoring Action: Prior to demolition, the Applicant shall retain a qualified asbestos abatement contractor to conduct an asbestos survey and remove any asbestos in compliance with applicable regulatory requirements. The Applicant shall submit the results of the asbestos survey to HCD – Planning for review and approval.

Mitigation Measure HAZ – 2: If, during demolition of any portion of the existing structure, paint is separated from the building material (e.g., chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed in accordance with local, state, and federal regulations. According to the Department of Toxic Substances Control ("DTSC"), if paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator shall be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any such requirements. Should paint be separated from building materials during demolition, the applicant shall retain a qualified hazardous materials inspector to determine its proper management.

Mitigation Measure HAZ – 2 Monitoring Action: In the event that paint should be separated from building materials during demolition, the Applicant shall retain a qualified hazardous materials inspector to survey the paint waste to determine whether it constitutes a hazardous material (i.e., LBP) and identify the appropriate disposal method for the material. The Applicant shall submit the results of the hazardous waste survey to HCD – Planning for review and approval.

Hazard and Hazardous Materials Impact (c) No Impact: The Proposed Project is located within the Robert Louis Stevenson School. The Proposed Project would not result in emissions of hazardous materials, or the handling of hazardous materials in excess of what currently occurs on site. The Project would replace the existing Lindsley Science Building. The Project site is not located within a quarter mile of a school. Therefore, no impact would occur.

Hazard and Hazardous Materials Impact (d) No Impact: The Project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Department of Toxic Substances Control, 2023). No impact would occur.

Hazard and Hazardous Materials Impact (e) No Impact: The Proposed Project is not located within an airport land use plan or within two miles of an airport. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the project area.

Hazard and Hazardous Materials Impact (f) Less than Significant: The Proposed Project would not interfere with or impair the implementation of any emergency response plans or evacuation plans. The primary evacuation routes near the Project site are SR 68 and SR 1. A

secondary evacuation route near the Proposed Project is 17 Mile Drive (*2021 Monterey County Operational Area Evacuation and Transportation Plan)*. The Proposed Project consists of the demolition of an existing academic building and the subsequent construction of a new, replacement, building. The Proposed Project would result in temporary construction-related traffic, but these effects would be limited in duration and would not physically impair and/or otherwise interfere with the implementation of an existing emergency response plan or evacuation plan. Moreover, the Proposed Project would not increase existing operational traffic beyond current levels associated with existing school operations. Therefore, the Project would not interfere with an emergency response plans or evacuation plans. This represents a less than significant impact.

Hazard and Hazardous Materials Impact (g) Less than Significant: The Proposed Project is located in an area of moderate wildfire risk. Due to the developed nature of the site, continuous fire management and fuel reduction efforts, and implementation of fuel management recommendations presented in the Fuel Management Plan prepared by Thompson Wildland Management, the Project would have a less than significant impact. Please refer to **Section VI.20 Wildfire** for more information.

10. HYDROLOGY AND WATER QUALITY **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (sources: 4,6,7,8, 24)	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (sources: 4,6,7,8, 24)	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site? (sources: 4,6,7,8,17,24,27)	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? (sources: 4,6,7,8,17, 24,27)	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (sources: 4,6,7,8,17,24,27)	☐	☐	☒	☐

10. HYDROLOGY AND WATER QUALITY **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (sources: 4,6,7,8,17, 25,27)	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (sources: 4,6,7,8,17,24,27)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

The Project site is located within the Seal Rock Creek watershed. More specifically, the Project site is approximately 1/4 mile south of an unnamed tributary of Seal Rock Creek. Surface water is present during and immediately following high precipitation events. The topography of the Project site is mostly level and slopes towards the unnamed tributary of Seal Rock Creek. The existing Robert Louis Stevenson School campus is improved with existing stormwater drainage facilities. The Proposed Project includes drainage-related improvements to address surface water runoff associated with the new MSEC. Applicable drainage improvements include drainage swales, biofiltration, and percolation retention facilities.

Hydrology and Water Quality Impact (a) and (c) Less than Significant: The Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Construction would result in ground disturbing activities as a result of demolition, excavation, and grading. Ground-disturbing activities and vegetation removal could generate temporary soil erosion and could potentially affect existing water quality. To minimize construction generated water quality impacts the contractor/engineer would implement standard construction BMPs. Moreover, the Proposed Project would also be required to comply with the requirements of MCC Chapter 16.08, which would ensure that temporary construction-related water quality impact would be minimized. Additionally, as noted on the Erosion Control Plan, the Proposed Project would comply with the 2017 Edition of the Caltrans Storm Water Quality Handbook and the 2015 California Stormwater BMP Handbook. Further, grading during the winter months would be restricted consistent with the requirements of standard Monterey County Condition of Approval *PD007 – Grading Winter Restriction*. The Project would also be required to submit a Stormwater Pollution Prevention Plan, or a letter of exemption from the Central Regional Water Quality Control Board. Finally, the Geotechnical Investigation also included recommendations to minimize erosion and surface drainage. Moreover, the Proposed Project would be required to comply with the recommendations of a design-level geotechnical analysis. For these reasons, the temporary construction-related impacts associated with the Proposed Project would be less than significant.

The Project would include the construction of new impervious surfaces, which could cause localized increases in erosion on- or off-site in the absence of drainage improvements and could

result in potential operational water quality impacts. The Project includes on-site drainage improvements (i.e., self-retaining areas) to address impacts due to increases in impervious surfaces. These improvements would ensure that impacts would be less than significant. In addition, the final design of the Proposed Project would be required to comply with the recommendations of a design-level drainage report. This represents a less than significant impact.

Hydrology and Water Quality Impact (b) Less than Significant: The Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. The Project consists of the demolition of an existing science building and the subsequent construction of a new science building. Specifically, the Project would demolish the existing Lindsley Science Building to allow for the construction of a new science building in substantially the same location as the existing science building. The Project site is located on the Robert Louis Stevenson School campus. The school, and Project site, has a verified Pebble Beach Water Entitlement which the Monterey County Environmental Health Bureau reviewed and determined was adequate for the Proposed Project. The Monterey County Environmental Health Bureau further identified that the Monterey Peninsula Water Management District ("MPWMD") determined that by using Pebble Beach Water Entitlement for the dormitories, the existing CalAm connections would be decoupled, which would provide a Water Use Credit that would cover the commercial use of the property (i.e., the new science building). As a result, there is sufficient available water supply to serve the Proposed Project. This represents a less than significant impact.

Hydrology and Water Quality Impact (d) Less than Significant: The Proposed Project is not located in an area subject to significant seiche, tsunami, or flooding effects. Moreover, FEMA designates the Project site as being located in an area of low flood risk (FEMA, 2023). As a result, the Project would not result in the risk of pollutants due to Project inundation from a tsunami, seiche, or flood hazard. This represents a less than significant impact.

Hydrology and Water Quality Impact (e) No Impact: The Proposed Project would not conflict with or obstruct a water quality control plan or sustainable groundwater management plan. As discussed previously, the Proposed Project would connect to existing water supply infrastructure. The Project site is currently served by a verified Pebble Beach Water Entitlement that is sufficient to serve the Proposed Project.

11. LAND USE AND PLANNING **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community? (sources: 6,7,8)	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (sources:6,7,8)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on land use and planning.

12. MINERAL RESOURCES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (sources: 3,6,7)	☐	☐	☐	☒
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? (sources: 3,6,7)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on mineral resources.

13. NOISE **Would the project result in:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (sources: 6,7,8)	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels? (sources:6,7,8,24,27)	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (sources:6,7,8)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Noise is commonly defined as unwanted sound. Sound levels are usually measured and expressed in decibels ("dB") with zero (0) decibels corresponding roughly to the threshold of hearing. Most sounds consist of a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Most environmental noise includes a conglomeration of noise from distant sources, which creates a relatively steady background noise in which no particular source is identifiable.

The Proposed Project site is located in the community of Pebble Beach, on the Robert Louis Stevenson School campus. The Project consists of the demolition of the existing Lindsley Science Building and the construction and operation of a new educational building (i.e., MSEC). The Project site is located directly off Forest Lake Road. The primary source of noise in the Project vicinity would be from vehicle traffic along Forest Lake Road, neighboring residences, golf courses, and the campus itself. The nearest residences are located approximately 200 feet to the west and north. The DMF LUP does not include specific policies related to noise but encourages land use to preserve the peace and tranquility of the existing neighbors. In absence of noise related polices within the DMF LUP, the 1982 Monterey County General Plan policies are applicable.

Noise Impact (a) Less than Significant: Construction of the Project would generate temporary noise in the project vicinity due to the use of equipment (e.g., trucks, tractors, excavators). The DMF LUP does not contain specific policies pertaining to noise, and therefore this analysis relies on noise policies contained in the Monterey County 1982 General Plan. As such, construction activities are required to comply with the Monterey County Noise Ordinance as described in Chapter 10.60 of the Monterey County Code. The ordinance applies to "any machine, mechanism, device, or contrivance" within 2,500 feet of any occupied dwelling unit and limits the noise generated to 85 dBA at a distance of 50 feet from the noise source. Noise generating construction activities are limited to the hours between 7AM. and 7PM. Monday through Saturday; no construction noise is allowed on Sundays or holidays. While the extent, duration, and volume of noise generated by the construction of the Project has not been identified, it is unlikely that construction noise would result in a significant impact given the location of the Project site, proximity of existing sensitive receptors, type of construction, and the temporary nature of construction activities. **Table 13-1 Construction Equipment Noise Emission Levels** identifies typical noise emissions (i.e., levels) generated by construction equipment and how equipment noise reduces with distance.[2]

Table 13-1
Construction Equipment Noise Emission Levels

Equipment	Typical Noise Level (dBA) 50 ft from Source	Typical Noise Level (dBA) 100 ft from Source[1]	Typical Noise Level (dBA) 200 ft from Source[1]	Typical Noise Level (dBA) 400 ft from Source[1]
Air Compressor	81	75	69	63
Backhoe	80	74	68	62
Ballast Equalizer	82	76	70	64
Ballast Tamper	83	77	71	65
Compactor	82	76	70	64

[2] The rate of noise diminishes as the distance from the source of noise doubles.

Table 13-1 Construction Equipment Noise Emission Levels				
Equipment	**Typical Noise Level (dBA) 50 ft from Source**	**Typical Noise Level (dBA) 100 ft from Source[1]**	**Typical Noise Level (dBA) 200 ft from Source[1]**	**Typical Noise Level (dBA) 400 ft from Source[1]**
Concrete Mixer	85	79	73	67
Concrete Pump	82	76	70	64
Concrete Vibrator	76	70	64	58
Dozer	85	79	73	67
Generator	81	75	69	63
Grader	85	79	73	67
Impact Wrench	85	79	73	67
Jack Hammer	88	82	76	70
Loader	85	79	73	67
Paver	89	83	77	71
Pneumatic Tool	85	79	73	67
Pump	76	70	64	58
Roller	74	68	62	56
Source: U.S. Department of Transportation, *Transit Noise and Vibration Impact Assessment,* 2006 Construction generated noise levels drop off at a rate of about 6 dBA per doubling of distance between the source and receptor.				

As noted, the nearest sensitive receptor is located 200 feet from the Project. Based on the proximity of the nearest receptor and the rate that noise diminishes, construction related activities would not exceed the County's noise related threshold.

Operational noise would not result in a permanent increase in ambient noise. The use of the site is for educational purposes consistent with the existing use and would not result in any additional noise-related impacts beyond those currently associated with existing use. This represents a less than significant impact.

Noise Impact (b) Less than Significant: The Project would not generate excessive groundborne vibration or groundborne noise. Construction of the Project would consist of the demolition of the existing Lindsley Science Building, and excavation of granitic bedrock during the construction of the new education building. Groundborne vibration would be generated from these activities but would be temporary in nature. Additionally, the Geotechnical Investigation suggested that the removal of granitic material may require unconventional construction methods such as injection of expansive putty (i.e., E-MITE) rather than bulldozers with rippers. The Geotechnical Investigation suggests that this alternative method is relatively silent. Operation of the Project would not create a new source of vibration. For these reasons this represents a less than significant impact.

Noise Impact (c) No Impact: The Project is not located within the vicinity of a private airstrip of an airport land use plan, or within two miles of a public airport. For these reasons, no impact would occur.

14. POPULATION AND HOUSING **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (sources: 6,7,8)	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (sources:6,7,8)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on population and housing.

15. PUBLIC SERVICES **Would the project result in:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
a) Fire protection? (sources:6,7)	☐	☐	☐	☒
b) Police protection? (sources: 6,7)	☐	☐	☐	☒
c) Schools? (sources:6,7)	☐	☐	☐	☒
d) Parks? (sources:6,7)	☐	☐	☐	☒
e) Other public facilities? (sources:6,7)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on public services.

16. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (sources:6,7)	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (sources:6,7)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on recreational resources.

17. TRANSPORTATION/TRAFFIC Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (sources: 6,7,8,19,21,22,23,24)	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (sources: 6,7,8,19,21,22,23,24)	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (sources: 6,7,8,19,21,22,23,24)	☐	☐	☐	☒
d) Result in inadequate emergency access? (sources: 6,7,8,19,21,22,23,24)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Keith Higgins prepared a traffic analysis titled *Robert Louis Stevenson School Master Plan Update Traffic Analysis, Monterey County, California*, dated April 2021. Keith Higgins evaluated transportation related impacts associated with the Robert Louis Stevenson School Pebble Beach Campus Master Plan Update, which includes the Proposed Project. Keith Higgins subsequently

prepared a supplemental analysis titled *Robert Louis Stevenson School Math, Science and Engineering Center Transportation Analysis, Monterey County, California*, dated January 2023 that evaluated the project-specific effects associated with the Proposed Project. The following discussion is based on the findings of those reports.

Existing Operations

The Proposed Project is located on the Robert Louis Stevenson School campus. As of 2021, the school had an enrollment of 500 students with 270 students boarding on campus and 230 students commuting to campus daily. The school currently employees 60 faculty and 40 staff, 40 of whom live on campus. Combined, 1,519 daily trips are estimated with 290 trips during AM peak hours and 246 trips in PM peak school hours and 186 trips during peak street hours.

Significance Criteria - Vehicle Miles Traveled

Senate Bill (SB) 743 required that starting July 2020 transportation impact for projects per CEQA be based on a project's Vehicle Miles Traveled ("VMT"). CEQA Guidelines Section 15064.3, subdivision (b)(1) calls for the evaluation of transportation impacts of projects based on Vehicle Miles Traveled ("VMT"). CEQA uses the VMT metric to evaluate a project's transportation impacts. The publication "Technical Advisory on Evaluating Transportation Impacts in CEQA, State of California Governor's Office of Planning and Research," December 2018, suggests that a significant environmental impact would occur if a project would generate more than 110 trips per day.

Transportation Impact (a) and (b) Less than Significant: The Proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities, or be inconsistent with CEQA guidelines Section 15064.3(b). The Proposed Project would result in temporary construction-related traffic. There would be no increase in operational traffic due to the Proposed Project.

The Proposed Project consists of the demolition of the existing Lindsley Science Building and the construction and operation of a new educational building. Construction would require 10 – 100 workers onsite at any given time during the duration of construction. Due to the temporary nature of construction, this would not result in a significant impact. Moreover, construction hours would be from 7 AM – 7 PM, and construction traffic would use Lisbon Lane, reducing traffic conflicts during peak hours along Forest Lake Road.

The Proposed Project would not result in any increase in operational traffic such that there would be an increase in VMT. For the purposes of this IS/MND, the Proposed Project would result in a significant traffic-related effect if the Project would exceed 110 daily trips. As noted previously, the Proposed Project would replace an existing, outdated, science building with a new academic building that would be used for similar purposes. The Proposed Project would not increase student enrollment and would not cause an increase in faculty or staff. As a result, the Proposed Project would not generate any additional traffic tips beyond those associated with existing operations.

Therefore, the Proposed Project would not result in a significant VMT-related impact. This represents a less than significant impact.

Transportation Impact (c) No Impact: The Proposed Project would not substantially increase hazards due to the geometric design features or incompatible uses. The Proposed Project would not be changing existing circulation systems, roadways, or bicycle and pedestrian facilities. No impact would occur.

Transportation Impact (d) No Impact: The Proposed Project would conform with all County and Fire Department requirements regarding emergency access, and therefore, would not result in inadequate emergency access. No impact would occur.

18. TRIBAL CULTURAL RESOURCES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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 (sources:6,7,26)	☐	☒	☐	☐
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (sources:6,7,26)	☐	☒	☐	☐

Discussion/Conclusion/Mitigation:

The following discussion is based on the results of the 2016 Preliminary Archaeological Assessment Report prepared by Archaeological Consulting. The information contained in this discussion is supplemented with additional information provided by Native American representatives as part of the Tribal consultation process undertaken by the County of Monterey in accordance with AB52. The County of Monterey met with representatives from the Esselen Tribe of Monterey County, as well as representatives from the Ohlone Costanoan Esselen Nation ("OCEN"). The Native American representatives identified that Pebble Beach is one of their

cultural landscapes and is considered a tribal cultural resource. The representatives requested that the Proposed Project include a tribal cultural monitor during demolition and grading activities and also requested that any resources encountered during construction be returned to the appropriate Native American group.

Tribal Resources Impact (a) and (b) Less than Significant with Mitigation: Public Resources Code Sec. 21074 defines a tribal cultural resource as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: a) included or determined to be eligible for inclusion in the California Register of Historical Resources, [or] b) included in a local register of historical resources as defined in subdivision (k) of [Public Resources Code] Section 5020.1" (Public Resources Code Sec. 21027(a)). No tribal cultural resources, as defined in Public Resources Code Section 21074, that is listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources, are known to exist at the Project site. No known or previously recorded archeological sites are located in or immediately adjacent to the Robert Louis Stevenson School. Additionally, the field reconnaissance conducted in July 2016 did not find surface evidence of potentially significant historic period archaeological resources. Furthermore, the Proposed Project site is developed with infrastructure associated with the Robert Louis Stevenson School campus and was previously disturbed in connection with the construction of the existing academic building (e.g., Lindsley Science Building, pathways, landscaped areas, etc.).

While no known tribal cultural resources exist at the Project site, other than its existence within a cultural landscape, construction-related activities could potentially affect a buried tribal cultural resource or previously unknown tribal cultural resource. In addition, Native American representatives identified that Pebble Beach is part of their cultural landscape and represents a tribal cultural resource. While the site has been extensively disturbed and modified in connection with existing educational uses, the Native American representatives identified potential concerns about construction activities and offered several recommendations to ensure that potential impacts associated with the Proposed Project would be minimized. These recommendations included requiring tribal cultural monitors during construction as well as recommending that that any resources encountered during construction be returned to the affected tribe. This represents a potentially significant impact that would be reduce to a less than significant level through the incorporation of the following mitigation.

Mitigation Measures TR – 1: To minimize potential impacts to previously unknown or subsurface tribal cultural resources, Native American tribes shall be notified prior to ground-disturbing activities. Prior to the issuance of any permit for ground-disturbing activities, the Applicant shall submit evidence (i.e., a contract) to HCD – Planning demonstrating that the Applicant has retained a tribal cultural monitor to monitor all ground-disturbing activities. The tribal cultural monitor shall be responsible for preparing daily monitoring reports and shall prepare a final report following the completion of ground disturbing activities. The final report, along with the daily monitoring reports, shall be submitted to HCD – Planning for review within 60 days following the completion of ground-disturbing activities. All work shall stop if a tribal cultural resource is discovered during construction. The Native American monitor shall evaluate the

resource to determine whether the finding is significant. If the finding is a historical resource or unique tribal cultural resource, avoidance measures or appropriate mitigation shall be implemented. Work will cease in the immediate vicinity of the find until mitigation can be implemented. In accordance with CEQA Guidelines Section 15064.5(f), work may continue in other parts of the project site during the implementation of potential resource mitigation (if necessary). The County of Monterey shall be responsible for reviewing and approving the mitigation plan in consultation with the Native American monitor prior to the resumption of ground-disturbing activities. All tribal resources shall be returned to the affected Native American tribe.

Mitigation Measure TR-1 Monitoring Action: Prior to the issuance of any construction permit, the Applicant shall submit evidence (i.e., contract) to HCD – Planning for review and approval demonstrating that the Applicant has retained a tribal cultural monitor to monitor ground disturbing activities. The tribal cultural monitor shall prepare daily monitoring reports that shall be available upon request by HCD – Planning. A final report, including all of the daily monitoring reports, shall be submitted to HCD – Planning for review and approval within 60 days of completion of ground disturbing activities.

19. UTILITIES AND SERVICE SYSTEMS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Source: 4,7)	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (Source:4,7)	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Source:4,7)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The Proposed Project would be provided wastewater services by the Pebble Beach Community Services District. The Proposed Project has a verified Pebble Beach Water Entitlement that is sufficient to serve the Proposed Project.

Utilities and Service Systems Impact (a) through (c) Less than Significant: Monterey County Environmental Health Bureau previously reviewed the Proposed Project and determined that the

existing wastewater and water connections were sufficient to serve the Project. The Proposed Project would connect to Pebble Beach Community Service District. Additionally, the Proposed Project would be served by an existing water entitlement intended to serve the Robert Louis Stevenson School campus. The Project consists of the demolition of the existing Lindsley Science Building to construct and operate a new educational building. The Proposed Project would not increase the demand for utilities beyond existing levels. The existing use of the site would not change. Moreover, the construction and operation of the new educational building would comply with existing local and state regulations and policies which would result in resource conservation practices (e.g., low-flush toilets).

20. WILDFIRE **If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan? (sources:6,7,16,19)	☐	☐	☒	☐
b) 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? (sources:6,7,16,19)	☐	☐	☒	☐
c) 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? (sources:6,7,16,13,19)	☐	☐	☒	☐
d) 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(sources:6,7,16,19)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The Proposed Project is located in a High Fire Hazard Severity Zone and is located in a State Responsibility Area (CalFire, 2022). The Project area could be subject to wildland fire hazards. The site is served by the PBCSD which contracts with CalFire to provide fire protection services. The PBCSD provides the facilities, equipment, vehicles, and supplies while CalFire provides the personnel to serve the PBCSD service area.

Wildfire Impact (a) – (d) Less than Significant: The Proposed Project is located in an area that is subject to high fire hazards (CalFire, 2022). Due to the relatively flat, developed nature of the site and existing fuel management efforts, it is unlikely that the Proposed Project would result in a

potentially significant impact with regards to wildland fires. Thompson Wildland Management prepared a Fuel Management Plan for the Stevenson Upper School Campus in March of 2021. The plan evaluated the existing conditions and found that there was adequate defensible space and reduced fuel loads in the majority of areas around the campus community. In addition, the Proposed Project also includes the installation of a fire suppression system (i.e., sprinklers) to minimize potential fire-related hazards. Furthermore, implementation of vegetation management guidelines and BMPs during construction and operation of the Project would ensure that fire risk is minimized. The Proposed Project is not located in an area that due to slopes, prevailing winds, and other factors, would exacerbate wildlife fire hazards. Similarly, the Proposed Project does not entail the installation of infrastructure that could exacerbate fire risks or that may result in temporary or on-going impacts to the environment. And finally, the Proposed Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. The Proposed Project consists of the construction of a replacement academic building and the school continues to implement campus-wide fuel reduction strategies to minimize potential wildland fire hazards to the campus. For these reasons, this represents a less than significant impact.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially 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, substantially 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? (sources: 6,7,8,11,12,13,14,15,26)	☐	☒	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a 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)? (sources: 6,7,8,11,12,13,14,15,26)	☐	☐	☒	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (sources: 6,7,8,11,12,13,14,15,26)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Mandatory Findings Impact (a) Less than Significant With Mitigation: As discussed in this Initial Study, the Proposed Project would not 1) degrade the quality of environment; 2)

substantially reduce the habitat of a fish or wildlife species; 3) cause a fish or wildlife population to drop below self-sustaining levels; 4) threaten to eliminate plant or animal community; 5) reduce the number or restrict the range of a rare or endangered plant or animal; or 6) eliminate important examples of major periods of California history or prehistory. The Project would result in temporary construction-related impacts to biological resources that would be mitigated to less than significant through mitigation measures identified above. Similarly, the Project site does not contain, nor is the site located near, any known cultural or tribal cultural resources. While unlikely, construction could unearth resources that were previously unknown. However, the Proposed Project would implement standard County Conditions of Approval to ensure that potential impacts related to the inadvertent discovery of previously unknown resource are minimized. Further, this Initial Study also identifies mitigation to ensure that potential impacts to previously unknown tribal cultural resources are minimized to a less than significant level. All potentially significant impacts associated with the Proposed Project would be minimized to a less than significant level through the implementation of mitigation measures identified in this Initial Study.

Mandatory Findings Impact (b) Less than Significant: To determine whether a cumulative effect requires an EIR, the lead agency shall consider whether the impact is significant and whether the effects of the project are cumulatively considerable (CEQA Guidelines §15064(h)(1)). In addition, CEQA allows a lead agency to determine that a project's contribution to a potential cumulative impact is not considerable and thus not significant when mitigation measures identified in the initial study will render those potential impacts less than considerable (CEQA Guidelines 15064(h)(2).

Here, the Proposed Project would not result in a cumulatively considerable adverse environmental effect when considered with past, present, and reasonably foreseeable future projects planned on the Robert Louis Stevenson School campus. In addition to the Proposed Project, the Applicant is also pursuing several other projects that have separate and independent utility from the Proposed Project. These projects include a General Development Plan Amendment in connection with the Applicant's Robert Louis Stevenson School Master Plan Update (PLN190091), as well as a project entailing the installation of seven (7) temporary modular classrooms (PLN220290) which provides temporary classrooms on a softball field.

These projects, when considered collectively, would not result in a cumulatively considerable impact for several reasons. First, this Initial Study identifies mitigation measures to lessen the extent of potential impacts associated with the Proposed Project to a less than significant level. These mitigation measures would ensure that the Project's contribution towards a cumulative impact (i.e., impacts associated with campus development) would be less than considerable. Moreover, the Proposed Project consists of the demolition and subsequent replacement of an existing academic building in substantially the same location as the existing Lindsley Science Building. As identified in this Initial Study, the Proposed Project is located entirely within a previously developed/disturbed portion of the existing campus. While this Initial Study identified potential impacts to biological resources due to the proximity of the site to adjacent biological resources, development is proposed entirely within the existing developed portions of the campus. Mitigation identified in this Initial Study would ensure that any potential secondary or indirect

impacts to surrounding biological resources during construction would be minimized. Second, other cumulative development at Robert Louis Stevenson School would be subject to additional project-level CEQA review and would be subject to project-specific mitigation measures to reduce those effects to a less than significant level thereby minimizing future cumulative effects associated with long range development at Robert Louis Stevenson School. The Master Plan update environmental analysis will include the Proposed Project within its analysis, unless the construction of the Proposed Project is complete by that time. Third, development of the Proposed Project would occur over a relatively short period and construction-related impacts would be limited in duration. The potential for construction activities associated with the Proposed Project to overlap and contribute towards a cumulative construction-related impact on campus would be unlikely as improvements to the campus are made as funding becomes available. Moreover, as identified in this Initial Study, potential temporary construction related impacts would be limited in duration and would not exceed any applicable threshold of significance related to construction-related impacts. As a result, the Proposed Project would not contribute to a cumulatively considerable construction-related impact. Finally, the Proposed Project would not increase campus enrollment or result in an increase in staff or faculty. As a result, the Proposed Project would not contribute to potential cumulative effects associated with increases in on-campus personnel (i.e., students, faculty, staff).

In summary, the Proposed Project, when considered with past, present, and reasonably foreseeable future development on the Robert Louis Stevenson School campus, would not result in a cumulatively considerable impact. All impacts associated with the Proposed Project would be addressed through 1) the implementation of mitigation measures identified in this Initial Study, 2) compliance with standard Monterey County conditions of approval, and 3) implementation of standard construction BMPs. No additional mitigation measures are necessary to reduce cumulative impacts to a less than considerable level.

Mandatory Findings Impact (c) Less than Significant: The Proposed Project would not have a substantial adverse effect on human beings, either directly or indirectly. The Proposed Project would result in temporary construction-related impacts that would be minimized to a less than significant level through the incorporation of construction best management measures and mitigation measures identified throughout this Initial Study. The Proposed Project consists of the demolition of the existing Lindsley Science Building and construction of a new education building in substantially the same location. Therefore, there would not result in a change in use. Additionally, the Proposed Project would not increase overall student enrollment and would not result in an increase in staff and faculty. The Proposed Project would replace an existing, outdated, academic building with a new educational building for substantially the same purpose as the existing Lindsley Science Building.

VIII. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

The State Legislature, through the enactment of Senate Bill (SB) 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a "de minimis" (minimal) effect on fish and wildlife resources under the jurisdiction of the California Department of Fish and Wildlife. Projects that were determined to have a "de minimis" effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of "de minimis" effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the California Department of Fish and Wildlife determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of "no effect" on fish and wildlife resources, development applicants must submit a form requesting such determination to the California Department of Fish and Wildlife. A No Effect Determination form may be obtained by contacting the Department by telephone at (916) 653-4875 or through the Department's website at www.wildlife.ca.gov.

Conclusion: The project will be required to pay the fee.

Evidence: Based on the record as a whole as embodied in the RMA-Planning files pertaining to PLN220243 and the attached Initial Study / Proposed (Mitigated) Negative Declaration.

IX. SOURCES

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