NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION FOR THE

Pacific Grove Wastewater Collection System Improvement Project – Phase 9 – Coastal Zone Segments

Located within the Railroad Right-of-Way, Arena Avenue Right-of-Way, and Asilomar Dunes

Pacific Grove, Monterey County

Public Review Period: March 30 to May 1, 2023

NOTICE IS HEREBY GIVEN that the City of Pacific Grove (City) has completed an Initial Study and Negative Declaration (IS/ND) for the proposed repair and replacement of three segments of the wastewater collection system located in the coastal zone: Railroad Way, Asilomar Dunes, and Arena Avenue (Project) in accordance with the California Environmental Quality Act (CEQA). The purpose of the Project is to ensure safe and reliable public wastewater collection service to the residents of Pacific Grove.

The Project segments are located in the Coastal Zone as defined in the City's Local Coastal Program (LCP). Specifically, the Project sites are located as follows: Railroad Way Segment - an approximate 540 linear foot section within and at the north end of the railroad right-of-way between Jewell and Pico Avenues (no address and no Assessor's Parcel Number (APN)); Arena Avenue Segment - an approximate 340 linear foot section of Arena Avenue within the road right-of-way between Sunset Drive and Asilomar Avenue (no address and no APN); and Asilomar Dunes Segment - within the Sunset Drive right-of-way immediately west of, and within a 10-foot utility easement located on, 214 Asilomar Boulevard, located between Sunset Drive and Asilomar Avenue and approximately 480 feet south of Jewell Avenue, Pacific Grove, Monterey County, CA. APN 007-041-004.

The **Railroad Way** segment includes approximately 537 linear feet of pipeline replacement via trenching within the former railroad right-of-way. Specifically, planned improvements in this segment include the following: replacement of 245 linear feet of 6" vitrified clay pipe (VCP) with 8" polyvinyl chloride (PVC) pipeline, reconstruction of a manhole approximately 92 feet from manhole 890, reconstruction of manhole 888, installation of 292 linear feet of 8" PVC pipeline, the plugging and in place abandonment of 292 linear feet of 6" VCP pipeline, and the construction of a new manhole approximately 100 feet from manhole 888.

The **Arena Avenue** segment includes excavation of 2 receiving pits and replacement of approximately 332 linear feet of 6" VCP with 8" HDPE pipeline (via pipe bursting) within the Arena Avenue right-of-way.

The **Asilomar Dunes** segment includes improvements within a 10-foot utility easement in dune habitat between Sunset Drive and Asilomar Ave, as well as within the Sunset Drive right-of-way. Planned work within the Sunset Drive roadway includes the following: replacement of pipeline that is at a 45-degree angle with a new straight section of 35 linear feet of 6" PVC, construction of a new manhole, removal of manhole 853, and plugging and abandonment of the angled section of 6" VCP pipeline. Planned work within the utility easement that extends through dune habitat and private property, between Sunset Drive and Asilomar Avenue, includes the following: a 9 linear foot spot repair located approximately 69 linear feet from manhole 853A, construction of a new manhole 854 approximately 167 feet from manhole 853A, reconstruction of manhole 855, and replacement of 95 linear feet of 6" VCP with 6" PVC via trenching.

The total length of pipeline installation (trenching & pipe bursting) for all three segments will total approximately 1,008 linear feet and involve a grand total of approximately 4,380 square feet of surface disturbance area.

As required by the LCP's Implementation Plan (IP), the application includes a Biological Assessment and an Archaeological Report. The conclusions and recommendations of these reports have been included as conditions of approval as appropriate.

The proposed project is not on a list compiled pursuant to Government Code Section 65962.5.

In accordance with Section 15072(a) of the CEQA Guidelines, the Public Notice officially notifies the general public, public agencies, and landowners that a 30-day public review period will begin on Thursday, March 30, 2023. Comments on the IS/ND should focus on environmental issues and must be received by Monday, May 1, 2023, by 5:00pm. Please submit email comments to dgho@cityofpacificgrove.org and written comments by mail to the following location:

City of Pacific Grove – Public Works Department

Attention: Daniel Gho, Director

300 Forest Avenue | Pacific Grove, CA 93950

Email or written comments received by Monday, May 1, 2023, will be considered before the ND is approved for adoption by the City's Planning Commission. A public meeting of the Planning Commission will be held following public notification of the hearing on the City's website. Regularly schedule Planning Commission meetings take place on the second Thursday of each month.

A copy of the Draft Initial Study/Negative Declaration is available for review at the Community Development Department at the address above and online at the following link: https://www.cityofpacificgrove.org/our_city/departments/community_development/programs___projects/ceqa.php

City of Pacific Grove
County of Monterey
State of California

NEGATIVE DECLARATION

Project Title:	Pacific Grove Wastewater Collection System Improvement Project – Phase 9 – Coastal Zone Segments
File Number:	22-0318
Owner:	City of Pacific Grove
Project Location:	City of Pacific Grove, County of Monterey
Primary APN:	007-041-004-000 for Asilomar Dunes Segment; Arena Avenue and Railroad Way Segments have no associated APNs
Project Manager/Planner:	Daniel Gho, Public Works Director / Joseph Sidor, Senior Contract Planner
Permit Type:	Coastal Development Permit
Project Description:	Repair and replacement of three segments of the wastewater collection system located in the coastal zone within the City of Pacific Grove.

THIS PROPOSED PROJECT WILL NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AS IT HAS BEEN FOUND:

a) That said project will not have the potential to significantly degrade the quality of the environment.

b) That said project will have no significant impact on long-term environmental goals.

c) That said project will have no significant cumulative effect upon the environment.

d) That said project will not cause substantial adverse effects on human beings, either directly or indirectly.

Decision Making Body:	City of Pacific Grove Planning Commission
Lead Agency:	City of Pacific Grove Public Works Department
Review Period Begins:	March 30, 2023
Review Period Ends:	May 1, 2023

Further information, including a copy of the Initial Study, is available at the City of Pacific Grove Community Development Department, 300 Forest Avenue, 2nd Floor, Pacific Grove, CA 93950, (831) 648-3183.

CITY OF PACIFIC GROVE

WASTEWATER COLLECTION SYSTEM IMPROVEMENT PROJECT
PHASE 9 – COASTAL ZONE SEGMENTS
DRAFT INITIAL STUDY/NEGATIVE DECLARATION

Prepared by:
CITY OF PACIFIC GROVE
300 FOREST AVENUE
PACIFIC GROVE, CA 93950

Technical Assistance Provided by:
HARRIS & ASSOCIATES
450 LINCOLN AVENUE, SUITE 103
SALINAS, CA 93901

MARCH 29, 2023

ADOPTED BY CITY OF PACIFIC GROVE PLANNING COMMISSION ON: _____

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Figures

Note: Figures 1 – 8 referenced in the Biological Resources section are located in Appendix B, Biological Resources Letter Report.

Appendices

CITY OF PACIFIC GROVE
300 FOREST AVENUE
PACIFIC GROVE, CALIFORNIA 93950
TELEPHONE (831) 648-3190 FAX (831) 648-3184

INITIAL STUDY / ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** Pacific Grove Wastewater Collection System Improvement Project – Phase 9 – Coastal Zone Segments (Project or proposed project)
2. **Permit Type(s):** Coastal Development Permit (CDP); Planning File No. 22-0318
3. **Lead Agency Name and Address:** City of Pacific Grove, 300 Forest Ave., Pacific Grove, CA 93950
4. **Lead Agency Contact Person and Phone Number:** Daniel Gho, Director, Public Works Department, T: 831-648-5722, E: dgho@cityofpacificgrove.org
5. **Project Location:** The Project includes the following three segments or project sites.
    a. **Railroad Way Segment** – an approximate 540 linear foot section within and at the north end of the railroad right-of-way between Jewell and Pico Avenues; no address and no Assessor's Parcel Number (APN)
    b. **Arena Avenue Segment** – an approximate 340 linear foot section of Arena Avenue within the road right-of-way between Sunset Drive and Asilomar Avenue; no address and no APN
    c. **Asilomar Dunes Segment** – Within the Sunset Drive right-of-way immediately west of, and within a 10-foot utility easement located on, 214 Asilomar Boulevard, located between Sunset Drive and Asilomar Avenue and approximately 480 feet south of Jewell Avenue, Pacific Grove, Monterey County, CA. APN 007-041-004

    See **Figure 1, Vicinity Map, and Figure 2, Area of Project Effect** for the location of the three project segments, which are all located in the Coastal Zone within the City of Pacific Grove, Monterey County.
6. **Project Applicant(s):** City of Pacific Grove Public Works Department
7. **General Plan (GP)/Land Use Plan (LUP) Designations:**
    a. **Railroad Way Segment** – Open Space (OS)
    b. **Arena Avenue Segment** – NA
    c. **Asilomar Dunes Segment** – NA and Low Density Residential (LDR 1-2), 1.0 DU/AC
8. **Zoning:**
    a. **Railroad Way Segment** – Open Space (O)
    b. **Arena Avenue Segment** – NA
    c. **Asilomar Dunes Segment** – NA and R-1-B-4
9. **Description of the Project:** The City of Pacific Grove (City) Public Works Department proposes to repair and replace the following three segments of the wastewater collection system located in the coastal zone: Railroad Way, Asilomar Dunes, and Arena Avenue

(Project). The purpose of the Project is to ensure safe and reliable public wastewater collection service to the residents of Pacific Grove.

Project Segments

The **Railroad Way** segment includes approximately 537 linear feet of pipeline replacement via trenching within the former railroad right-of-way. Specifically, planned improvements in this segment include the following: replacement of 245 linear feet of 6" vitrified clay pipe (VCP) with 8" polyvinyl chloride (PVC) pipeline, reconstruction of a manhole approximately 92 feet from manhole 890, reconstruction of manhole 888, installation of 292 linear feet of 8" PVC pipeline, the plugging and in place abandonment of 292 linear feet of 6" VCP pipeline, and the construction of a new manhole approximately 100 feet from manhole 888.

The **Asilomar Dunes** segment includes improvements within a 10-foot utility easement in dune habitat between Sunset Drive and Asilomar Ave, as well as within the Sunset Drive right-of-way. Planned work within the Sunset Drive roadway includes the following: replacement of pipeline that is at a 45-degree angle with a new straight section of 35 linear feet of 6" PVC, construction of a new manhole, removal of manhole 853, and plugging and abandonment of the angled section of 6" VCP pipeline. Planned work within the utility easement that extends through dune habitat and private property, between Sunset Drive and Asilomar Avenue, includes the following: a 9 linear foot spot repair located approximately 69 linear feet from manhole 853A, construction of a new manhole (#854) approximately 167 feet from manhole 853A, reconstruction of manhole 855, and replacement of 95 linear feet of 6" VCP with 6" PVC via trenching.

The **Arena Avenue** segment includes excavation of 2 receiving pits and replacement of approximately 332 linear feet of 6" VCP with 8" high-density polyethylene (HDPE) pipeline (via pipe bursting) within the Arena Avenue right-of-way.

The project would avoid and minimize impacts on sensitive resources, including the dune habitat and Monterey cypress and Monterey pine trees, to the maximum extent feasible. See **Appendix A**, Plan Set, for a detailed description of the proposed improvements in each segment.

The total length of pipeline installation (via trenching and pipe bursting) for all three segments would total approximately 1,008 linear feet and involve a grand total of approximately 4,380 square feet of surface disturbance area.

Project Construction

Construction duration is anticipated to be 6 weeks total (less for each individual segment), and may occur during peak summer months; therefore, to minimize or avoid potential construction impacts to traffic capacity and/or public access, the City shall prepare and implement a Temporary Traffic Handling Plan pursuant to PGMC section 23.90.210(b)(2). In accordance with the City's Noise Ordinance, construction activity would be limited to the hours of 8:00 a.m. to 6:00 p.m., Monday through Saturday, and 10:00 a.m. to 5:00 p.m. on Sunday.

During construction, the project would use standard construction equipment, such as excavators, backhoes, dump trucks, and compactors. There would be no pile driving or other high impact activity that would result in high levels of noise or vibration. Construction equipment and materials would be staged in disturbed or paved areas with containment measures for fuels or other potentially hazardous materials and away from drainages.

The Project includes implementation of the following best management practices (BMPs):

- Standard dust control practices, such as periodic watering, will be implemented as needed during construction.
- All construction equipment will comply with the California Air Resources Board's measures to reduce fuel-consumption, such as imposing limits on idling and requiring older engines and equipment to be retired, replaced, or repowered.
- All diesel-powered equipment will use California ultralow sulfur diesel fuel with a maximum sulfur content of 15 pounds per day by weight to minimize emissions of sulfurous gases.
- Construction equipment will be properly maintained and checked for potential leaks of potentially hazardous fuels (e.g., gas, oil).
- Construction equipment will remain within developed portions of the project sites (e.g., paved roads, maintained access roads), and activities set to occur outside these locations would be minor and temporary in nature.
- Water quality protection measures will be implemented during construction (see PDF-3 below).
- A construction traffic management plan will be prepared to address vehicle movement during temporary street closures, whereby emergency access will be retained or clear alternative routes will be available.
- All disturbed areas will be restored to existing conditions. Restoration of the dune habitat in the Asilomar Dunes segment includes replacement of vegetation removed with native species.

Standard Conditions of Approval

The project would be subject to the City's standard conditions of approval, including for cultural resources (e.g., archaeological and tribal monitoring).

Project Design Features (Environmental Commitments)

In addition to the construction related BMPs and Conditions of Approval described above, the City would implement the following measures to protect biological resources. The PDFs would be incorporated into the construction plans.

PDF-1: Focused Rare Plant Clearance Survey and Avoidance. Before ground-disturbing activities, including digging, clearing, grubbing, and grading, a qualified biologist shall conduct a pre-construction sensitive plant survey within 100 feet of the project disturbance areas. If sensitive plant species are identified by the qualified person, they shall flag the extent of each species patch or individual in the survey area for avoidance during the pre-construction survey. If sensitive plant species are observed in the impact area during the pre-construction sensitive plant survey or cannot be avoided during implementation, individuals shall be counted, and permanent impacts shall be mitigated at a 1:1 ratio in suitable habitat outside the impact areas as applicable.

PDF-2: Sensitive Habitats Flagging and Fencing. Before ground-disturbing activities, including digging, clearing, grubbing, and grading, a qualified person shall flag and/or install avoidance fencing around the outer limits of the disturbed dune scrub habitat and sensitive Monterey cypress and Monterey pine trees. The flagging and installed avoidance fencing shall remain in place through the end of construction.

PDF-3: Water Quality Protection Measures.

1. Standard construction best management practices for erosion and sediment control, such as the use of silt fencing, shall be implemented to prevent wind and water erosion and to minimize subsequent sedimentation to nearby sensitive habitats and potential aquatic features.

2. The project shall implement the following practices to provide effective temporary and final erosion control during construction as needed:

a. Preserve existing vegetation where required and when feasible.
b. Control the area of soil-disturbing operations so the construction contractor can implement erosion control best management practices quickly and effectively.
c. Stabilize non-active areas within 14 days of cessation of construction activities or sooner if stipulated by local requirements.
d. Control erosion in concentrated flow paths by applying temporary erosion-control blankets, check dams, erosion-control seeding, or alternate methods.
e. Prior to the completion of construction, apply permanent erosion control to any remaining disturbed soil areas.
f. Maintain sufficient erosion-control materials on site.

3. The following temporary sediment-control best management practices shall be implemented in conformance with the following guidelines and in accordance with the standard best management practice guidance:

a. Silt Fence: As practical and necessary, silt fencing may be placed at the perimeter of disturbed site areas to mitigate discharge of sediment from site stormwater flows.
b. Weed-Free, Plastic-Free (No Monofilament) Fiber Rolls: Fiber rolls may be used for several different applications, including but not limited to perimeter control, grade break and separation, and alternate check dam. They shall not be used on paved or hardscape media. Temporary fiber rolls installed to control erosion and sedimentation during construction shall be removed once construction is complete.
c. Stabilized Construction Entrances and Exits: Stabilized construction entrances and exits shall be placed at ingress and egress points of the disturbance area.

4. Construction padding material, if required, shall be free of any weed seeds, contaminants, or pollutants.

5. No debris, silt, slash, sawdust, rubbish, cement, or concrete, or washings thereof; oil or petroleum products; or other organic or earthen material from any maintenance, construction, or associated activity of any nature shall be allowed to enter or be placed where it may be washed by rainfall or runoff into sensitive habitats and potential aquatic resources in and surrounding the work areas.

6. Construction equipment with visible mud or dirt cakes on tracks, wheels, and undercarriage shall be power washed at a minimum of 100 feet from the limits of work areas to prevent weeds from entering the project site.

7. Construction vehicles and equipment shall be repaired and refueled a minimum of 100 feet from the limits of sensitive habitats and potential aquatic resources within and surrounding the work areas, including the disturbed dune scrub, to the maximum extent feasible. If refueling or repairing equipment or vehicles in or near sensitive habitats or aquatic resources within or surrounding the work areas is unavoidable, appropriate secondary containment shall be employed to prevent spills from entering these sensitive areas. Drip pans and spill containment materials shall always be present and accessible on the construction site.

PDF-4: Nesting Bird Survey. No grubbing, trimming, or clearing of vegetation from the project site shall occur during the general raptor and bird breeding season (January 15 through August 31). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside the general bird breeding season, a qualified person shall perform a pre-construction nesting bird survey no more than 1 week prior to the start of vegetation grubbing, trimming,

or clearing to determine if active bird nests are present in the affected areas. Should an active bird nest be located, the qualified person shall establish a buffer and direct vegetation clearing away from the nest until it has been determined that the young have fledged or the nest has failed. If no nesting birds (including nest building or other breeding or nesting behavior) are in the construction area, grubbing, trimming, or clearing shall proceed.

10. **Surrounding land uses and setting:** The three project segments are located in established residential neighborhoods, designated and zoned for residential use, within the City.

    The Railroad Way segment is located within a railroad right-of-way between Jewell and Pico Avenues. The Asilomar Dunes and Arena Avenue segments are located between Sunset Drive and Asilomar Avenue in an area considered environmentally sensitive dune habitat and within an archaeologically sensitive area. The Asilomar Dunes residential area is identified as an area of moderate to extreme biological sensitivity per Land Use Plan Figure 5, Land Habitat Sensitivity Map; and the Asilomar Dunes are considered an environmentally sensitive habitat area (Land Use Plan Section 2.4.1).

    The City of Pacific Grove is located on the Monterey Peninsula adjacent to the Pacific Ocean, and is bounded by the ocean on its western, northern, and eastern edges. The Mediterranean climate of the region and the coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months.

11. **Other public agencies whose approval is required:** The project will require approval of a Coastal Development Permit by the City of Pacific Grove Planning Commission. No other planning entitlement approvals or other agency approvals will be required.

12. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**
    Yes. Pursuant to Public Resources Code Section 21080.3.1, City of Pacific Grove Public Works staff initiated consultation via notification letters with local Native American tribes on November 17, 2022. Consultation meetings were held with the Esselen Tribe of Monterey County on November 8, 2022, and with the Ohlone/Costanoan-Esselen Nation (OCEN) on November 15, 2022. See Section 18, Tribal Cultural Resources, below for additional information.

    Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review and identify and address potential impacts. Information on specific on-site cultural resources may be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. It should be noted that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Environmental Factors Potentially Affected:
The environmental factors checked below (✓) would be potentially affected by this project, as discussed within the checklist on the following pages.

✓	**Aesthetics**	✓	**Greenhouse Gas Emissions**		**Public Services**
	Agriculture & Forestry Resources	✓	**Hazards & Hazardous Materials**		**Recreation**
✓	**Air Quality**		**Hydrology & Water Quality**	✓	**Transportation**
✓	**Biological Resources**		**Land Use & Planning**	✓	**Tribal Cultural Resources**
✓	**Cultural Resources**		**Mineral Resources**	✓	**Utilities & Service Systems**
✓	**Energy**	✓	**Noise**		**Wildfire**
	Geology & Soils		**Population & Housing**	✓	**Mandatory Findings of Significance**

DETERMINATION: (To be completed by the Lead Agency)

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  Date 3-29-23

Daniel Gho, Public Works Director
City of Pacific Grove

CEQA Environmental Checklist

This checklist identifies the potential physical effects the Project could have on the environment. In many cases, background studies performed in connection with the project indicate no impacts. A NO IMPACT answer in the last column reflects this determination. Where there is a need for clarifying discussion, the discussion is included either following the applicable section of the checklist or is within the body of the environmental document itself. The words "significant" and "significance" used throughout the following checklist are related to the California Environmental Quality Act (CEQA), not the National Environmental Policy Act (NEPA), impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

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 a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational.

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 "Earlier Analyses," as described in (5) below, 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) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) 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 a level of less than significant.

1. AESTHETICS

Except as provided in Public Resources Code Section 21099,

Would the project:

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

C. In non-urbanized areas, 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 points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

D. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A & C: The project would not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surrounding area.

The three (3) project sites are located in a residential area near the coast. There are some views of the ocean from the public roadways, including Arena Avenue and Asilomar Boulevard. The ocean is generally not visible from Railroad Way. The Railroad Way segment is highly disturbed and previously developed as part of a former railroad right-of-way. The Arena Avenue segment is within a public street. The Asilomar Dunes segment is within a utility easement on a parcel developed with a single-family residence and with dune habitat.

All three sites are located within the Coastal Zone and subject to the City's certified Local Coastal Program (LCP), which includes the adopted Land Use Plan (LUP) and Implementation Plan (PGMC 23.90). Per LUP Policy SCE-6, all utilities will be located underground or outside of public view. Per LUP Policy SCE-10, the trees within the railroad right-of-way will be protected and retained as the project would not impact this resource. Per LUP Figure 4 (Scenic Areas), the Arena Avenue segment and the Asilomar Dunes segment are located within a Scenic View area.

The project includes improvements to approximately 1,008 linear feet of the City's wastewater collection system, which would result in temporary disturbance to approximately 4,380 square feet of surface. The visual character at each of the 3 sites would be altered during construction, but this would be temporary and for a short duration. Once construction is complete, the improvements would be primarily underground and not visible (with the exception of replacement and new manholes covers that would be visible). Further, as described in Section 9, the Project includes restoration of the disturbed surface, including the dune habitat in the Asilomar Dunes segment, to existing conditions. Therefore, the project would not adversely affect a scenic vista or degrade the visual character or quality of public views, and the impact would be **less than significant**.

Items B: The project would not damage scenic resources within a state scenic highway. There are no designated state scenic highways within the City, based on the California Scenic Highway Program. The only state highway eligible for scenic designation within the City is Highway 68, which is not in the project vicinity. The nearest project segment to Highway 68 is Arena Avenue, which is over 3,000 linear feet (0.57 mile) north of the end point of Highway 68 at Asilomar Avenue. Therefore, there would be **no impact**.

Item D: The project consists of improvements to the underground wastewater collection system and does not include any features that would introduce a new source of light. Therefore, there would be **no impact**.

Sources:

- California Department of Transportation (Caltrans). California Scenic Highway Program. https://dot.ca.gov/-/media/dot-media/programs/design/documents/od-county-scenic-hwys-2015-a11y.pdf
- City of Pacific Grove, LCP Implementation Plan, Coastal Community Design, §23.90.180.C.4.
  Chapter 23.90 LOCAL COASTAL PROGRAM IMPLEMENTATION PLAN (codepublishing.com)

2. AGRICULTURE AND FORESTRY 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:

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

B. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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))?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A - E: According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the City of Pacific Grove is located on land identified as *urban and built-up land* and *other land*. The 3 project sites (Railroad Way, Arena Avenue, Asilomar Dunes) are not farmland, other agricultural land, or forest land. There are no agricultural or forest resources within or surrounding the project sites, and no trees would be removed to implement the project. Accordingly, the project would not: A) convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use; B) conflict with existing zoning for agricultural use, or a Williamson Act contract; C) conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production; D) result in the loss of forest land or conversion of forest land to non-forest use; or 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. Therefore, the project would result in **no impact** to agriculture or forest resources.

Sources:

- California Department of Conservation. Farmland Mapping and Monitoring Program. http://www.conservation.ca.gov/dlrp/fmmp

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:

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

C. Expose sensitive receptors to substantial pollutant concentrations?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

D. Result in other emissions (such as those relating to odors) adversely affecting a substantial number of people?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

DISCUSSION

Item A: The City of Pacific Grove, including the three project sites, is within the Monterey Bay region of the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). MBARD is responsible for developing regulations governing emissions of air pollution, permitting and inspecting stationary sources, monitoring air quality, and air quality planning activities within the NCCAB. MBARD's 2012-2015 Air Quality Management Plan (AQMP) outlines the air quality regulations for the MBARD region. MBARD's 2008 CEQA Guidelines assist local jurisdictions in determining consistency and impacts levels.

The NCCAB does not meet state standards for fine particulate matter (PM_{10}); however, ozone and its precursors (reactive organic gases [ROGs] and nitrogen oxides [NOx]) remain a pollutant of concern in the MBARD AQMP. Therefore, the regional pollutants of concern are ozone precursors and PM_{10}.

The project would improve approximately 1,008 linear feet of the City's wastewater collection system at three (3) sites, which would result in approximately 4,380 square feet of ground disturbance and emissions from construction equipment.

Construction projects using typical construction equipment, such as excavators, dump trucks, scrapers, bulldozers, compactors, and front-end loaders that temporarily emit precursors of ozone (i.e., volatile organic compounds [VOC] or oxides of nitrogen [NOx]), are accommodated in the emission inventories of state and federally required air plans and would not have a significant impact on the attainment and maintenance of ozone ambient air quality standard (AAQS) (MBUAPCD 2008). The Project would require typical construction equipment. Project construction may result in a short term, localized decrease in air quality due to generation of PM_{10}. However, as stated in Section 9, standard dust control best management practices (BMPs), such as periodic watering, would be implemented during construction to reduce the generation of PM_{10}. Construction emissions are not expected to prevent long-term attainment or maintenance of the ozone and particulate matter standards within the North Central Coast Air Basin (NCCAB).

Project operation would be the same as existing conditions. The project would not result in any new long-term operational emissions from vehicle trips (mobile emissions) or the use of natural gas (energy source emissions), consumer products, architectural coatings, or landscape maintenance equipment (area source emissions). No stationary sources would be constructed that would be long-term permanent sources of emissions.

Therefore, the project would not conflict or obstruct the implementation of the applicable AQMP, and the impact would be **less than significant**.

Item B: As described above, the primary pollutants of concern for the NCCAB are ozone and PM_{10}. Project construction would have a limited and temporary potential to contribute to existing violations of California air quality standards for ozone and PM_{10}, primarily through diesel engine exhaust and fugitive dust. According to the MBARD CEQA Guidelines, a project would have a significant short-term construction impact if the project would emit more than 82 pounds per day or more of PM10. Further, the MBARD CEQA Guidelines set a screening threshold of 2.2 acres of construction earthmoving per day. In other words, if a project results in less than 2.2 acres of earthmoving, the project is assumed to be below the 82 pounds per day threshold of significance. As stated in Section 9, the project would result in approximately 4,380 square feet (0.1 acre) of total disturbance area and would not exceed the 2.2 acre daily earthmoving screening threshold. Following construction, operation of the project would not result in a new source of criteria pollutant emissions. Because the project would not exceed MBARD's thresholds and is consistent with the AQMP, as discussed above, it would not result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, the impact would be **less than significant**.

Item C: MBARD defines sensitive receptors for CEQA purposes as any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (K-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. Sensitive receptors also include long term care hospitals, hospices, prisons, and dormitories or similar live-in housing. The residences adjacent to the three project sites are considered sensitive receptors. However, the project would not generate substantial pollutant concentrations, as described above. As stated in Section 9, the construction activities would occur during the day, Monday through Friday, for approximately six weeks total for all three segments together. Therefore, the individual receptor exposure time would be substantially less. Once construction is completed, there would be no additional operational emissions. Therefore, the impact to sensitive receptors would be **less than significant**.

Item D: Land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would repair and replace sections of the existing wastewater collection lines. Construction activities are not anticipated to result in exposure of nearby receptors to wastewater

odors, and the project does not include any new uses that would be associated with objectionable odors. There could be short-term, temporary odors from vehicle exhaust and construction equipment engines. However, California ultralow sulfur diesel fuel with a maximum sulfur content of 15 ppm by weight would be used in all diesel-powered equipment, which minimizes emissions of sulfurous gases (sulfur dioxide, hydrogen sulfide, carbon disulfide, and carbonyl sulfide). Because the project sites are in a coastal area with breezes from Monterey Bay, it is likely that any construction-related odors would disperse and dissipate before causing substantial odors at the closest sensitive receptors. Any construction-related odors would be short-term and would cease upon completion. Therefore, construction and operation of the project would not create objectionable odors affecting a substantial number of people, and the impact would be **less than significant** operation.

Sources:

- MBUAPCD, 2008. Monterey Bay Unified Air Pollution Control District (MBUAPCD), CEQA Air Quality Guidelines. Prepared by the MBUAPCD, Adopted October 1995, Revised: February 1997, August 1998, December 1999, September 2000, September 2002, June 2004 and February 2008.

4. BIOLOGICAL RESOURCES

Would the project:

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

C. Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

E. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

The following discussion is based on the results of the database review, field survey, and habitat assessment conducted by Harris & Associates (Harris) qualified biologist on October 6, 2022. A full accounting of the results of the database review and habitat assessment is provided in the Biological Resources Letter Report prepared for the project (**Appendix B**, Biological Resources Letter Report). Figures 1 – 8 referenced in the discussion below are located in Appendix B.

The field survey of the Area of Project Effect (APE) with a 100-foot biological resources survey area buffer, herein referred to as the "survey area" (**Figure 1**, Regional Location, and Figure 2, Survey Area). The survey was conducted by walking meandering transects throughout the survey area, mapping vegetation communities, and evaluating the potential for occurrence of sensitive, rare, threatened, and endangered plant and wildlife species. Vegetation mapping was recorded in the field using the ArcGIS Collector application with an aerial image of the survey area. The survey area is approximately 13.5 acres. Of that total, approximately 3.2 acres is disturbed dune scrub, 4.1 acres is disturbed (ruderal) habitat, and 6.2 acres is urban/developed land (Figure 3, Vegetation Communities and Land Cover Types). The survey area includes one sensitive vegetation community, disturbed dune scrub (Figure 3). Two sensitive plant species were observed in the survey area, and three sensitive plant species were determined to have high potential to occur. No sensitive wildlife species were observed in the survey area; however, two sensitive wildlife species were determined to have high potential to occur. Discussions of these sensitive species and potential impacts are discussed under Item 4(a).

The results of the database review provide information on any permitting requirements and potential constraints to project development due to the presence (or lack thereof) of sensitive biological resources. A review of the following online databases was conducted for the project and within a 1-mile radius of the survey area: California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) (CDFW 2022a), CDFW Biogeographic Information and Observation System (BIOS) (CDFW 2022b), U.S. Fish and Wildlife (USFWS) Information for Planning and Consultation (IPaC) (USFWS 2022a), USFWS National Wetlands Inventory Wetlands Mapper (USFWS 2022b), Consortium of California Herbaria database (CCH 2022), Calflora database (Calflora 2022), and California Native Plant Society Inventory of Rare and Endangered Plants of California (CNPS 2022).

The project's APE includes the Asilomar Dunes residential area, as identified in the Pacific Grove Local Coastal Program (LCP) (Pacific Grove LCP Land Use Plan Figure 6, Coastal Zone Land Use Designations). The Asilomar Dunes residential area is identified as an area of moderate to extreme biological sensitivity per Pacific Grove LCP Land Use Plan Figure 5, Land Habitat Sensitivity Map, and the Asilomar Dunes are an Environmentally Sensitive Habitat Area (Land Use Plan Section 2.4.1).

Item A:

Direct Impacts

Sensitive Plant Species

In total, the 24 sensitive plant species that have been historically documented within 1 mile of the survey area were analyzed for their potential to occur. These sensitive plant species documented within 1 mile of the survey area are shown on Figure 5, Sensitive Species with Potential to Occur in the Survey Area. Database results (i.e., CNPS, IPaC) that did not provide geographic information systems (GIS) mapping data are not shown on Figure 5, but are discussed in the Sensitive Plant and Wildlife Species section of **Appendix B**.

Two sensitive plant species, Monterey cypress (CNPS California Rare Plant Rank [CRPR] 1B.2) and Monterey pine (CNPS CRPR 1B.1), were observed in the survey area during the 2022 habitat assessment (Figure 4, Biological Resources).

Three sensitive plant species were not observed but were determined to have high potential to occur in the survey area: sandmat manzanita (*Arctostaphylos pumila*), Monterey spineflower (*Corizanthe pungens* var. *pungens*), and Menzies' wallflower (*Erysimum menziesii*). Critical habitat for Yadon's piperia (*Platanthera yadonii*) touches the 1-mile data research buffer in the southeast (Figure 5). No Yadon's piperia critical habitat falls in the survey area. The survey area falls within Monterey spineflower designated critical habitat (Figure 5).

Although potential suitable habitat exists for the sensitive plant species with high potential to occur, the vegetation communities in the survey area, including disturbed dune scrub, disturbed (ruderal) habitat, and urban/developed land, do not provide high-quality suitable habitat for these sensitive plant species due to the dominance of non-native invasive species, poor habitat conditions, and consistent disturbance from surrounding developed land uses (Figure 3). Further, extensive disturbance from pedestrians and bicycles was observed in the potentially suitable disturbed dune scrub habitat in the Arena Avenue segment. The disturbed dune scrub in the Asilomar Avenue segment of the survey area is dominated and overrun by non-native species, primarily a dense, expansive cover of Chilean sea fig (*Carpobrotus chilensis*) and is unlikely to support sensitive plant species. However, no focused rare plant surveys were conducted, and the presence or absence of these sensitive plant species with potential to occur could not be confirmed.

As described in the Project Description (Section 9), the project has been designed to avoid and minimize impacts on sensitive resources, including the Monterey cypress and Monterey pine trees, as well as the disturbed dune scrub that may have the potential to support sensitive plant species, to the maximum extent feasible. The project sites are within the developed areas and disturbed habitat of the roadways and residential properties, and thus have a low likelihood of supporting sensitive plant species due to continued mechanical (and potentially chemical) disturbance. Construction equipment would remain within developed portions (i.e., paved roads and maintained access roads), and activities set to occur outside these locations would be minor, mostly confined to disturbed areas, and temporary in nature. Although implementation of the project is unlikely to result in impacts on habitat that could support sensitive plant species, there is a slight possibility that sensitive plant species could be disturbed. This potential impact would be reduced to a less than significant level with implementation of the BMPs and PDFs. Therefore, the impact would be **less than significant**.

Sensitive Wildlife Species

In total, 23 sensitive wildlife species that have been historically documented within 1 mile of the survey area were analyzed for their potential to occur (Figure 5). No sensitive wildlife species were observed in the survey area during the habitat assessment; however, the survey was conducted in early October 2022, outside the active season for most species (i.e., breeding birds, migrating or ovipositing butterflies). Although not observed during the field survey, there is potential occurrence of two sensitive wildlife species, monarch butterfly overwintering population (*Danaus plexippus* population 1) and Allen's hummingbird (*Selasphorus sasin*). The vegetation communities and land cover types in the survey area, including disturbed dune scrub, disturbed (ruderal) habitat, and developed land, do not provide high-quality suitable habitat for these sensitive wildlife species due to poor habitat conditions (Figure 3). Further, many of the other sensitive wildlife species occurrences were documented more than 40 years ago, and these species have likely been extirpated from the area since that time.

Occurrences of overwintering monarch butterfly, a candidate for federal listing under the Endangered Species Act, have been documented within 1 mile of the survey area in the past 10 years (Figure 5). The Monterey cypress trees in the survey area have potential to be used by monarch butterflies during migration. Further, many of the flowering plants that occur in the disturbed dune scrub provide suitable nectar sources for monarch butterflies moving through the survey area. However, suitable habitat for monarch butterflies is likely not present at the project sites because suitable wintering groves provide a dense grove of trees sheltered from high winds typically by an outer grove or windrow of trees. The trees at the project sites are fairly spread out, and don't provide much shelter from high winds.

As previously discussed, PDF-2, Sensitive Habitats Flagging and Fencing, would require a pre-construction focused rare plant clearance survey and the installation of avoidance flagging and fencing around the sensitive dune habitat, Monterey cypress trees, and Monterey pine trees prior to construction to avoid potential encroachment. Further, activities that would occur in the disturbed dune scrub would be minor in footprint and nature and would not result in the removal or disturbance (i.e., tree trimming) of Monterey cypress or nectar sources for overwintering monarch butterflies. Therefore, the potential for direct impacts on monarch butterflies or other potentially occurring sensitive species would be **less than significant**.

As discussed in the Project Description, the project has been designed to avoid impacts on sensitive resources to the maximum extent feasible, including the Monterey cypress, Monterey pine, and disturbed dune scrub that could support sensitive wildlife species. Further, the majority of the proposed APE occurs in the developed land and disturbed habitat of the roadways and residential properties that have a low likelihood to support sensitive wildlife species. With implementation of PDF-1 through PDF-4, the disturbed dune scrub, Monterey cypress, Monterey pine, and other vegetation that occur in the proposed APE that could support sensitive wildlife species would be avoided during project activities. Therefore, implementation of the project would not result in impacts on habitat that could support sensitive wildlife species. Direct impacts on sensitive wildlife species would be **less than significant**.

Indirect Impacts

Potential indirect impacts on sensitive plant and wildlife species generally include construction-related habitat disturbance (trampling), dust generation, pollutant discharges, soil erosion and runoff, noise, vibration, lighting, increased human activity, introduction of non-native and invasive plant species, and accumulation of trash and garbage, which can attract introduced terrestrial, native terrestrial, and avian predators (i.e., corvids, canids, raccoons, and striped skunks). These temporary construction-related impacts could adversely affect sensitive plant and wildlife species that could occur in the survey area. Potential indirect impacts would be reduced to a less than significant level with implementation of PDF-1, Focused Rare Plant Clearance Survey and Avoidance, and PDF-2, Sensitive Habitats Flagging and Fencing, which require a pre-construction focused rare plant clearance survey and the installation of avoidance flagging and fencing around the sensitive dune habitat prior to construction

to avoid potential habitat disturbance. Additionally, the Standard BMPs, including those required by PDF-3, Water Quality Protection Measures, for dust suppression measures, erosion- and sediment-control measures (sand and gravel bags, plastic-free [no monofilament] fiber rolls, and silt fencing), use of weed-free erosion-control products, and preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), would be required of the construction contractor. The SWPPP would be prepared pursuant to the National Pollution Discharge Elimination System General Construction Permit (Water Quality Order 99-08-DWQ). The SWPPP would address the potential sources and locations of stormwater contamination characteristics, impacts of specific contaminants, and temporary and permanent erosion-control practices and would include water sampling data, construction practices that minimize stormwater contamination, coordination of BMPs with planned construction activities, and compliance with County, state, and federal regulations. Additional BMPs that would be required during construction include noise suppression measures and trash containment methods. With the implementation of PDF-1 through PDF-3 and standard construction BMPs, temporary indirect impacts on sensitive plant and wildlife species observed and with high potential to occur in the survey area would be **less than significant**.

Nesting Birds

No raptor or bird nests were observed in the survey area during the habitat assessment; however, a focused nesting bird survey was not conducted, and the survey was conducted at the end of the breeding season when active bird nests are not likely to be observed. The multitude of buildings and trees and shrubs, both native and non-native, provide plentiful nesting habitat for passerines and raptors protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), Section 3504. Therefore, there is high potential for birds and raptors to nest in the survey area.

As previously discussed, no trees are proposed for removal, and no tree trimming is expected to occur during project construction; therefore, implementation of the project would not remove potential nesting habitat for protected raptors and birds. However, if construction is conducted during the general bird breeding season (January 15 through August 31), PDF-4, Nesting Bird Survey, would require a pre-construction nesting bird survey to avoid direct and indirect impacts on bird species protected under the MBTA and CDFW. Therefore, potential impacts to nesting birds would be **less than significant**.

Roosting Bats

The project does not propose the removal of potential roosting habitat in the nearby buildings, rock crevices, and coniferous trees or of suitable foraging habitat in the ornamental plantings in and surrounding the survey area that would occur during project construction. Further, no nighttime work is proposed that would disturb bats potentially roosting in or around the survey area. Therefore, the potential impact on roosting bats would be **less than significant**.

In summary, the potential impact to candidate, sensitive, or special status plant or wildlife species would be **less than significant**.

Items B: The survey area contains one sensitive vegetation community, approximately 3.2 acres of disturbed dune scrub located in the Asilomar Dunes and Arena Avenue segments (Figure 3) (CDFW 2022c). Approximately 0.2 acre of disturbed dune scrub occurs in the APE for the project site along Asilomar Avenue, and 0.2 acre of disturbed dune scrub occurs in the APE for the project site along Arena Avenue. There is no riparian habitat in the survey area.

Previous residential development has completely altered the natural topography of the dunes and altered the plant composition as well. The disturbed dune scrub occurring in the Asilomar Avenue segment is dominated by non-native Chilean sea fig, with coyote brush (*Baccharis pilularis*) and smooth

cat's ear (*Hypochaeris glabra*) throughout and shows evidence of modification from the planting of non-native ornamental species from the surrounding residential development. In comparison, the disturbed dune scrub in Arena Avenue segment is dominated by native species, including beach sagewort and dune sedge grass (*Carex pansa*), with scattered goldenbush, seacliff buckwheat (*Eriogonum parvifolium*), liveforever (*Dudleya* sp.), pink sand verbena (*Abronia umbellata*), California aster (*Symphyotrichum chilense*), dune grass (*Elymus* sp.), and saltgrass (*Distichlis spicata*). Although the dune scrub in the Arena Avenue segment supports more native species, this area is characterized as disturbed because of large open weedy patches, apparent historical modification from the surrounding development, and current disturbance from adjacent landowners and members of the public pedestrians as evidenced by bicycle tires tracks and footprints.

Direct Impacts

Construction would be limited to the paved and dirt roadways that directly border the disturbed dune scrub in the Asilomar Avenue and Arena Avenue segments, avoiding direct impacts on the disturbed dune scrub vegetation (Figure 4). Further, no trees or shrubs would be trimmed or removed during implementation of the project, and as required by PDF-2, sensitive dune habitat would be flagged and/or fenced for avoidance prior to construction. The disturbed (ruderal) habitat and developed land in the survey area are not considered sensitive vegetation communities and impacts on these land cover types would be **less than significant**.

Indirect Impacts

Most of the indirect impacts on sensitive plant species described in Item 4(a) also result in potentially significant indirect impacts on sensitive vegetation communities. Indirect impacts on the sensitive vegetation community, disturbed dune scrub, in the survey area could result from invasion by exotic species, exposure to construction-related pollutant discharges, and trampling by humans. As previously discussed in Threshold 4(a), implementation of PDF-2, Sensitive Habitats Flagging and Fencing, would require the installation of avoidance flagging and fencing around the sensitive dune habitat prior to construction to avoid potential disturbance. Standard construction BMPs, including those required by PDF-3, Water Quality Protection Measures, for dust suppression measures, erosion- and sediment-control measures (sand and gravel bags, plastic-free [no monofilament] fiber rolls, and silt fencing), use of weed-free erosion-control products, and preparation and implementation of a SWPPP, would be required of the construction contractor during project implementation. With implementation of PDF-2, PDF-3, and standard construction BMPs, indirect impacts on the sensitive vegetation community in the survey area would be **less than significant**.

Items C: There are no wetlands on the three project sites. Two potentially jurisdictional aquatic resources were observed in the southern portion of the survey area along Arena Avenue adjacent to a private residence in the Arena Avenue Segment (Figure 6, Potentially Jurisdictional Aquatic Resources). Although a formal aquatic resources delineation was not conducted in the survey area during the 2022 habitat assessment, these two features were preliminarily determined to be erosional drainages, likely constructed or formed from periodic surface stormwater flows directed away from the residence that occurs south of the survey area in this location. These two erosional drainages are surrounded by upland, disturbed habitat, and developed land (Figure 3). The two erosional drainages are outside of the project impact area and disturbance of these potential aquatic resources is not expected to occur during construction.

Direct Impacts

Construction activities in the Arena Avenue segment adjacent to the aquatic resources would be limited to the paved roadway and would not disturb the banks or bottom of the drainages. Therefore, the impact on the potentially jurisdictional aquatic resources in the survey area would be **less than significant**.

Indirect Impacts

Most of the indirect impacts on sensitive plant species and sensitive vegetation communities described in Items 4(a) and 4(b) could also result in potentially significant indirect impacts on potentially jurisdictional aquatic resources. Indirect impacts could result from generation of fugitive dust, changes in hydrology resulting from construction (including sedimentation and erosion), and exposure to construction-related pollutant discharges. As previously discussed in Items 4(a) and 4(b), standard construction BMPs, including those required by PDF-3, Water Quality Protection Measures, for dust suppression measures, erosion- and sediment-control measures (sand and gravel bags, plastic-free [no monofilament] fiber rolls, and silt fencing), use of weed-free erosion-control products, and preparation and implementation of a SWPPP, would be required of the construction contractor during project implementation. With implementation of PDF-3 and standard construction BMPs, indirect impacts on the potentially jurisdictional aquatic resources in the survey area would be **less than significant**.

Items D: The survey area is in a relatively densely populated portion of Pacific Grove that is bordered by the Pacific Ocean. While mule deer, a large ungulate/mammal, are abundant in the survey area, the survey area is unlikely to be used as a major wildlife movement corridor for other large mammals due to the disturbance by humans and lack of connectivity to larger open space. The California Essential Habitat Connectivity Project has not identified any wildlife movement corridors occurring on or within the vicinity of the project site (CDFW 2022d). The nearest designated wildlife movement corridor is 4.6 miles to the southeast. Mesocarnivores, including foxes and coyotes, have some potential to be found in the survey area but are not likely to use the area as major routes of movement or for nursey sites. The survey area falls within the Pacific Flyway and, therefore, is used by birds during migration.

The project would not permanently impact the majority of the survey area, including the existing trees and disturbed dune scrub, and would not impede wildlife movement through the survey area. General wildlife movement routes that may occur through the survey area would remain after implementation of the project. The project would not impact the potential aquatic resources or any other downstream aquatic areas that would interfere with the movement of native resident or migratory fish species. Implementation of the project would not substantially interfere with the movement or established migratory corridors of native resident or migratory fish or wildlife species, including the use of native wildlife nursery sites. Therefore, impacts on wildlife movement corridors would be **less than significant**.

Items E: The Asilomar Dunes and Arena Avenue segments occur within the Asilomar Dunes Environmentally Sensitive Habitat Area and Coastal Zone Planning Area VI of the Pacific Grove LCP Land Use Plan, which provides policies and guidelines for land use and development in the Pacific Grove Coastal Zone (City of Pacific Grove 2020). The Pacific Grove LCP requires coastal development permits for any development within the Pacific Grove Coastal Zone and Environmentally Sensitive Habitat Area (ESHA), including project activities that require grading, design review, and conditional use permits, prior to project approval. Further, the project would be subject to the goals and policies outlined in the Natural Resources Element of the City of Pacific Grove General Plan (City of Pacific Grove 1994).

As previously discussed in Items 4(a) through 4(d), the project would not result in significant impacts on sensitive biological resources, including sensitive plant and wildlife species, sensitive vegetation communities, potentially jurisdictional aquatic resources, or wildlife movement corridors. Through implementation of PDF-1 through PDF-4, avoidance of impacts on biological resources, and compliance with the permit requirements of the Pacific Grove LCP, the project would comply with the local policies and ordinances protecting biological resources identified in the Natural Resources Element of the City of Pacific Grove General Plan and the Pacific Grove LCP (City of Pacific Grove 1994, 2020). The project would not result in tree removal, limbing, or otherwise adversely affect

existing trees. Therefore, the project would not conflict with local policies or ordinances protecting biological resources, including tree preservation, and the impact would be **less than significant**.

Items F: The survey area is not within an area protected by or subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. Therefore, there would be **no impact**.

Sources:

- Calflora. 2022. "Information on Wild California Plants." Accessed November 2022. http://www.calflora.org/.
- CCH (Consortium of California Herbarium). 2022. "Consortium of California Herbarium." Updated November 8. Accessed November 2022. http://ucjeps.berkeley.edu/consortium/.
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  USGS (U.S. Geological Survey). 2022. National Hydrologic Dataset. Accessed November 2022. https://www.arcgis.com/home/webmap/viewer.html?url=https://hydro.nationalmap.gov/arcgis/rest/services/nhd/MapServer&source=sd.

5. CULTURAL RESOURCES

Would the project:

A. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

C. Disturb any human remains, including those interred outside of dedicated cemeteries?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

DISCUSSION

The following discussion is based on the results of the database review of information provided by the Northwest Information Center for the project area of potential effect (APE), field survey, and cultural resources assessment conducted by Harris & Associates (Harris) qualified archaeologist on October 6, 2022.

Item A: The archival research did not indicate the presence of historical resources, and no historical resources were identified during the cultural reconnaissance survey. Based on the records search and the cultural survey, it has been determined that the project would not cause a substantial adverse change in the significance of a historical resource because they do not occur within the project APE. Therefore, there would be **no impact**.

Items B - C: The archival research did indicate the presence of one prehistoric archaeological resource (P-27-000493/CA-MNT-000399) within the project APE. The site was originally recorded in 1973, and the record identified that the site included workshop flakes and culturally modified shell. The condition of the site was identified as poor. Site P-27-000493/CA-MNT-000399 was not located during the pedestrian survey and may have been destroyed as a result of residential development. Due to the sensitivity of the area, there is potential for inadvertent discovery of cultural resources, including archaeological/historical resources and human remains. Per Land Use Plan Policy CRS-2, monitoring would be required during ground-disturbing activities, and the City will apply a standard condition of approval to require archaeological monitoring during all ground disturbing activities. Therefore, potential impacts to cultural resources would be **less than significant**.

Source:

- Cultural Resources Survey Letter Report – Negative Findings, City of Pacific Grove Capital Improvement Project for Wastewater Collection Phase 9, prepared by Donna Beddow, M.A., RPA of Harris & Associates, October 2022 (Confidential)

6. ENERGY

Would the project:

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

DISCUSSION

Item A: The project would be responsible for an incremental increase in the consumption of energy resources during construction due to operation of construction equipment and vehicle trips from trucks and worker's vehicles. As described in Section 9, all project construction equipment would be required to comply with the California Air Resources Board (CARB) emissions requirements for construction equipment, which includes measures to reduce fuel-consumption, such as imposing limits on idling and requiring older engines and equipment to be retired, replaced, or repowered. As a result, potential impacts associated with the small temporary increase in consumption of fuel during construction are expected to be **less than significant**.

The project involves replacing existing segments of sewer lines. No impacts are expected from project operation. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The construction and operation impact regarding wasteful and inefficient energy use would be **less than significant**.

Item B: The County of Monterey adopted a Municipal Climate Action Plan (CAP) in 2013 and is currently preparing a 2030 Community Climate Action Plan. The 2013 CAP included GHG reduction strategies to increase energy efficiency at County facilities (County of Monterey 2013). The 2030 CAP update is anticipated to include a net-zero greenhouse gas (GHG) emissions goal for County facilities (County of Monterey 2022). As previously described, operation of the proposed sewer system improvements would be substantially similar to existing conditions. Therefore, the proposed project would not conflict with local energy efficiency plans, and the potential impact would be **less than significant**.

Sources:

- County of Monterey. 2013. Monterey County Municipal Climate Action Plan. June.
- County of Monterey. 2022. "Sustainability at Monterey County". Accessed August 20, 2022. Available at https://www.co.monterey.ca.us/government/departments-a-h/administrative-office/intergovernmental-and-legislative-affairs/sustainability

7. GEOLOGY AND SOILS

Would the project:

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? Refer to Division of Mines and Geology Special Publication 42.

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

(ii) Strong seismic ground shaking?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

(iii) Seismic-related ground failure, including liquefaction?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

(iv) Landslides?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

B) Result in substantial soil erosion or the loss of topsoil?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

E) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

F) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A – F: According to the State of California Department of Conservation Division of Mines and Geology Special Publication 42, Pacific Grove is not within an earthquake fault zone. Pacific Grove, including each of the three (3) project sites, is situated on relatively stable granite bedrock, which reduces the likelihood of damage resulting from a seismic event. The project would be constructed in accordance with applicable seismic design parameters in the California Building Code. Approximately 4,380 square feet of surface area across three sites would be disturbed to implement the repair and replacement of wastewater collection system infrastructure. All soils removed during trench work and pipe burst would be replaced, limiting the potential for substantial soil erosion or loss of topsoil. The project sites are spread across two soil types, Baywood sand (BbC, 2 to 15 percent slopes) and Dune land (Df). Neither soil type is considered expansive, as defined in Table 18-1-B of the California Building Code. The project would not involve the construction of septic tanks or alternative wastewater disposal systems. Lastly, there is no record of the properties containing a unique paleontological resource or site or unique geologic feature that would be directly or indirectly impacted as a result of the project. Moreover, the project would occur in areas previously disturbed for installation of wastewater collection and street infrastructure. Therefore, the project would result in **no impacts** related to geology and soils.

Sources:

- California Department of Conservation. Earthquake Fault Zones: A Guide for Government Agencies, Property Owners / Developers, and Geoscience Practitioners for Assessing Fault and Rupture Hazards in California (Special Publication 42). https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Publications/SP_042.pdf
- County of Monterey GIS Geologic Hazards Map: https://montereyco.maps.arcgis.com/apps/webappviewer/index.html?id=80aadc38518a45889751e97546ca5c53
- United States Department of Agriculture Soil Conservation Service. Soil Survey of Monterey County, California. https://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/california/CA053/0/montery.pdf

8. GREENHOUSE GAS EMISSIONS

Would the project:

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

DISCUSSION

Item A: In accordance with Section 15183.5(b) of the CEQA Guidelines, a plan for the reduction of greenhouse gas (GHG) may be used to analyze whether a project would result in significant GHG emissions provided that the plan includes specific elements. Plans that meet the listed requirements are referred to as Qualified GHG Reduction Plans. Plans are required to include an emissions inventory, establish baselines below which GHG emissions would not be cumulatively considerable, estimate future GHG emissions in the covered geographic area, specify measures to meet emissions reduction targets, establish a mechanism to monitor plan progress, and be adopted following environmental review.

The County's 2013 CAP is not a qualified plan, and the 2030 community update has not been adopted. However, the project's contribution of GHG emissions would be limited to an incremental increase in greenhouse gas (GHG) emissions by usage of fossil fuels during the project's short (approximately 6 week) construction period. Additionally, as outlined in the Bay Area Air Quality Management District's (BAAQMD) recently adopted GHG thresholds, construction emissions typically represent a very small portion of a project's lifetime GHG emissions. Therefore, the significance of GHG emissions and emissions reduction planning focuses on on-going annual GHG contributions (BAAQMD 2022). The project would not result in a net increase in VMT, and energy demand of the replaced sewer line segments would be similar to existing conditions. The replaced sewer line segments would replace older infrastructure and would likely result in emissions savings by extending the life of the lines compared to existing conditions. As such, the project would not result in an ongoing contribution to GHG emissions, and the impact would be **less than significant**.

Item B: The County of Monterey adopted a Municipal CAP in 2013 and is currently preparing a 2030 Community Climate Action Plan. As previously described, operation of the proposed system improvements would be substantially similar to existing conditions. The proposed project would not result in a net increase in ongoing GHG emissions and would not include any components that would conflict with CAP implementation. The potential impacts would be **less than significant**.

Source:

- Bay Area Air Quality Management District (BAAQMD). 2022. Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans. April.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

A) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

C) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

F) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

G) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A - B: Project implementation would require the use of construction equipment typical of small infrastructure construction projects, the operation of which could result in a spill or accidental release of hazardous materials, including fuel, engine oil, and lubricant. However, the use and transport of any hazardous materials would be subject to federal, state, and local regulations, which would minimize risk associated with the transport of hazardous materials. Operationally, the project would not involve the use or storage of hazardous materials. Therefore, potential impacts would be **less than significant**.

Items C - E: The project sites are not located on or within 1,000 feet of a known hazardous materials site or within 0.25 mile of an existing or proposed school. The nearest airport (Monterey Regional Airport) is over 4.92 miles to the southeast of the project sites. See Section VI.13, Noise, for analysis regarding potential noise impacts. Therefore, the project would result in **no impact** to schools, hazardous materials sites, or airports.

Item F: Given that the project would involve improvements to the City's wastewater collection system, the project would not impair or interfere with an adopted emergency response or evacuation plan. During construction, street closures would be of limited duration and alternative routes would be available. Emergency access would also be retained during construction activities. Therefore, the potential impacts of the project would be **less than significant** regarding interfering with an emergency response plan or emergency evacuation plan.

Item G:
The project sites are not located within or adjacent to a wildland fire hazard area per the latest adopted Fire Hazard Severity Zone map, and the project does not involve construction of above-ground structures that could be subject to wildfires. Therefore, the project would have **no impact** regarding exposing people or structures to wildland fire hazards.

Sources:

- California Government Code Section 65962.5. http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65962.5
- Monterey Regional Airport Land Use Compatibility Plan. Adopted February 25, 2019. https://www.co.monterey.ca.us/home/showpublisheddocument?id=75251
- CAL FIRE – Very High Fire Hazard Severity Zone in LRA map. https://osfm.fire.ca.gov/media/5871/pacific_grove.pdf

10. HYDROLOGY AND WATER QUALITY

Would the project:

A) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

B) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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;

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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; or

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

iv) impede or redirect flows?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

D) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

E) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A – C & E: The project involves improvements to approximately 1,008 linear feet of the City's wastewater collection system at three (3) sites. Construction-related activities will be minor and temporary in nature, occurring within road and railroad rights-of-way and a utility easement on a previously developed lot in an established residential neighborhood. This minor scope of development would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. During construction, excavated materials will be protected with erosion control measures to avoid or minimize runoff. Drainage characteristics of the project sites will not be permanently altered in a manner that would increase erosion or runoff. As proposed, the project would not violate any water quality standards or waste discharge requirements, alter the drainage pattern of the site or area, nor provide additional sources of polluted runoff or degrade water quality. Additionally, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the project would result in **no impacts**.

Item D: The project would not expose people or structures to a significant risk involving flooding. According to Flood Insurance Rate Map (FIRM) Panels 06053C0164H and 06053C0168H, the project sites is not located within a flood plain or within a 100-year flood hazard area, or in an area prone to flooding. There are no levees or dams within two miles of the sites. Tsunami and seiche vulnerability at the sites is limited. The project sites are not located near a freshwater lake or pond, so the potential for inundation from a seiche or mudflow is also low. Since flooding hazards are limited, the project would not risk the release of pollutants due to project inundation, nor impede or redirect flood flows. Therefore, the project would result in **no impact** regarding flood hazards.

Sources:

- 2019 California Building Code - California Code of Regulations. Prepared by California Building Standards Commission.
- National Flood Hazard Layer, FIRM Panels 06053C0164H and 06053C0168H
- California Department of Conservation. *Monterey County Tsunami Hazard Areas*, Monterey County Tsunami Hazard Areas (ca.gov)
- FEMA Flood Map Service Center. https://msc.fema.gov/portal/home
- City of Pacific Grove Land Use Plan, Figure 3, Coastal Hazards and Areas of Potential Sea Level Rise

11. LAND USE AND PLANNING

Would the project:

A. Physically divide an established community?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Item A: The project would involve improvements to approximately 1,008 linear feet of the City's wastewater collection system at three (3) sites within the Coastal Zone. The project would not physically divide an established community, and **no impact** would occur.

Item B: The project would be subject to the City of Pacific Grove's 1994 General Plan and 2020 Local Coastal Program. Segment A (Railroad Way) would be located within a former railroad right-of-way zoned Open Space (O) with a General Plan (GP) land use designation of Open Space (OS). Segment B (Arena Avenue) would be located along Arena Avenue, which does not have a zoning or GP land use designation. Segment C (Asilomar Dunes) would be located within a utility easement on a developed residential parcel. A portion of the site is zoned R-1-B-4 (Single Family Residential with Coastal Zone Overlay) with a GP land use designation of Low Density Residential (LDR 1-2), 1.0 DU/ac. The remainder of the site (i.e., the portion within the Sunset Drive right-of-way) does not have a zoning or GP land use designation. Each project site is located within the Coastal Zone, and all are subject to the City's certified Local Coastal Program which includes the adopted Land Use Plan and Implementation Plan (PGMC 23.90).

The project would not conflict with any land use plan, policy, or regulation and would not result in impacts. See Sections 4 (Biological Resources), 5 (Cultural Resources), and 18 (Tribal Cultural Resources) for additional information and analysis. There would be **no impact**.

Sources:

- City of Pacific Grove 2020 Local Coastal Program. https://www.cityofpacificgrove.org/living/community-development/planning/local-coastal-program

12. MINERAL RESOURCES

Would the project:

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A & B: According to the City's 1994 General Plan Natural Resources Element (Chapter 6), the Pacific Grove area is classified as "MRZ-3", the designation given to areas containing mineral deposits for which the significance cannot be evaluated from available data (Pacific Grove General Plan section 6.3.2). General Plan section 6.3.2 further states that the City is nearly built out, precluding any mineral extraction. Moreover, no mineral resources have been identified within the

project site and no active mineral resource extraction operations would be affected by the project. Therefore, the project would have **no impact** on mineral resources.

Sources:

- City of Pacific Grove General Plan. 1994. https://www.cityofpacificgrove.org/living/community-development/planning/general-plan

13. NOISE

Would the project result in:

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

B) Generation of excessive groundbourne vibration or groundbourne noise levels?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A, B: Construction of the proposed project would generate temporary noise in the vicinity of the construction area. However, construction would only occur for approximately six weeks, and would occur in three separate locations, resulting in a reduced extent of exposure at individual receptors. Additionally, as described in Section 9, construction activities would be subject to the City's Noise Ordinance, (Chapter 11.96 of the Municipal Code), which limits construction activity to the hours of 8:00 a.m. to 6:00 p.m., Monday through Saturday, and 10:00 a.m. to 5:00 p.m. on Sunday. Therefore, construction would be limited to daytime hours when residences are less noise sensitive. Construction would not require pile driving or other high impact activity that would result in high levels of vibration. Operationally, the project would not result in a substantial permanent increase in ambient noise given that the project involves the replacement of existing wastewater collection infrastructure with similar, improved pipeline below the ground surface. Therefore, the impact related to increased noise and vibration would be **less than significant**.

Item C: The project site is not located within the vicinity of a private airstrip. The project site is within the Airport Influence Area (AIA) of the Monterey Regional Airport, as is all the City of Pacific Grove, but not in an area or a use type that requires special study or restrictions. The project would replace existing pipeline with similar infrastructure and would not expose people working or residing in the project vicinity to excessive noise levels related to air traffic. Therefore, there would be **no impact.**

Sources:

- City of Pacific Grove, Chapter 11.96, Unlawful Noises. https://www.codepublishing.com/CA/PacificGrove/#!/PacificGrove11/PacificGrove1196.html#11.96
- Monterey Regional Airport Land Use Compatibility Plan. https://www.co.monterey.ca.us/home/showpublisheddocument?id=75251

14. POPULATION AND HOUSING

Would the project:

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)?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

B) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A & B: The proposed project is intended to ensure safe and reliable public wastewater collection service to residents of Pacific Grove. The project would not increase the capacity of the wastewater collection system nor remove a current obstacle to growth that could indirectly generate population growth. The project would not displace existing housing nor displace people or housing. Therefore, there would be **no impact**.

Sources:

- Project file

15. PUBLIC SERVICES

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

A) Fire protection?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

B) Police protection?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

C) Schools?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

D) Parks?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

E) Other public facilities?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A-E: The project would involve repairs to portions of the City's wastewater collection system and would not result in an expansion of the system. The project sites are located in an established residential neighborhood served by the Monterey Fire Department, City of Pacific Grove Police Department, and Pacific Grove School District. The project would not create substantial new demand for public services (e.g., fire, police, schools, parks, libraries, hospitals, community centers) that would result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services. The project would have no measurable effect on existing public services in that the project would not result in an increase in demand and would not require expansion of services to serve the project. Temporary closures of Arena Avenue and Sunset Drive during construction would be of short duration and would not delay emergency response as other routes would remain open. As described in Section 9, a construction traffic management plan would be prepared for work in roadways, and emergency access would be retained during construction activities in roadways. Therefore, the project would have **no impact** to fire and police protection, schools, parks, or other public facilities.

Sources:

- Project file

16. RECREATION

A) Would the project 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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A & B: The project would not result in a net increase in population or a commensurate increase in the use of existing parks. Pacific Grove has 28 public parks including the coastline across Sunset Drive from Segments B (Arena Drive) and C (Asilomar Dunes) of the project site, and the Southern Pacific Railroad Right-of-Way, which encompasses the entirety of Segment A (Railroad Way). Improvements to the City's existing wastewater collection system would not increase the use of any existing parks or open space/recreational areas, as there would be no population increase resulting from the project. There would be **no impact** to recreational facilities.

Sources:

- Project file
- City of Pacific Grove General Plan. 1994. https://www.cityofpacificgrove.org/living/community-development/planning/general-plan

17. TRANSPORTATION

Would the project:

A) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

B) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

				X

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

D) Result in inadequate emergency access?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

DISCUSSION

Items A - B: The project would not involve transportation improvements and would not create potential for new users of local and regional transportation systems. Therefore, the project would not conflict with any program, plan, ordinance, or policy addressing the circulation system—including transit, roadway, bicycle, and pedestrian facilities—nor would it conflict with CEQA Guidelines section 15064.3, subdivision (b), related to determining the significance of transportation impacts. CEQA Guidelines Section 15064.3(b)(1) applies to land use projects and describes criteria for analyzing transportation impacts, stating, "Vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact." The Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (2018) has set a screening threshold of 110 trips per day to quickly identify when a project would have a less than significant impact due to VMT. The project would not result in an increase in population, and therefore would not result in an increase in VMT associated with the project site. Therefore, there would be **no impact**.

Items C - D: The project includes repair and replacement of wastewater collection facilities that are primarily underground, including replacement of manhole covers in the roadway which would remain flush with roadway grade and not present a hazard for roadway users. The proposed project would not design features that could increase hazards (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). As described in Section 9, a Temporary Traffic Handling Plan (TTHP) would be prepared for work in roadways, and emergency access would be retained during construction activities in roadways. Construction may occur during peak summer months; therefore, pursuant to PGMC section 23.90.210(b)(2), the City would implement the TTHP so the project would not result in reduction of roadway capacity or public access. Also, per LUP Policy PRA-8, the project would not have the potential to adversely impact public access due the availability of alternative routes and the short duration of street closures. The impact related to transportation hazards and emergency access would be **less than significant**.

Sources:

- Project file

18. TRIBAL CULTURAL RESOURCES

A. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

DISCUSSION

The following discussion is based on the results of the database review of information provided by the Northwest Information Center for the project area of potential effect (APE), field survey, and cultural resources assessment conducted by Harris & Associates (Harris) qualified archaeologist on October 6, 2022.

Item Ai: The archival research did not indicate the presence of historical resources, and no historical resources were identified during the cultural reconnaissance survey. Based on the records search and the cultural survey, it has been determined that the project would not cause a substantial adverse change in the significance of a historical resource because they do not occur within the project APE. Therefore, there would be **no impact**.

Item Aii: The archival research indicated the presence of one prehistoric archaeological resource (P-27-000493/CA-MNT-000399) within the project area of potential effect. The site was originally recorded in 1973 and the record identified that the site included workshop flakes and culturally modified shell. The condition of the site was identified as poor, and Site P-27-000493/CA-MNT-000399 was not located during the pedestrian survey and may have been destroyed as a result of residential development.

Pursuant to Public Resources Code Section 21080.3.1 and Land Use Plan Policy CRS-1, City of Pacific Grove Public Works staff initiated consultation via notification letters with local Native American tribes on November 17, 2022. The first consultation meeting with the Esselen Tribe of Monterey County was actually held on November 8, 2022, and with the Ohlone/Costanoan-Esselen Nation (OCEN) on November 15, 2022. Tribal representatives requested access to archaeological reports/surveys, inclusion in mitigation and recovery programs, tribal monitoring, reburial of ancestral remains if found, and return of all cultural items.

Due to the sensitivity of the area, there is potential for inadvertent discovery of cultural resources, including archaeological/historical resources and human remains. Per Land Use Plan Policy CRS-2, monitoring would be required during ground-disturbing activities, and the City will apply a standard

condition of approval to require tribal monitoring during all ground disturbing activities. Therefore, potential impacts to cultural resources would be **less than significant**.

Source:

- Cultural Resources Survey Letter Report – Negative Findings, City of Pacific Grove Capital Improvement Project for Wastewater Collection Phase 9, prepared by Donna Beddow, M.A., RPA of Harris & Associates, October 2022 (Confidential)

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

B. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

D. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

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

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

DISCUSSION

Items A - C: The project would repair and replace existing wastewater collection pipelines and associated facilities. The proposed improvements would generally be made in place, with the construction of some new elements (including manholes and PVC pipelines) within each project site. There is no need for relocation of system facilities; and per LUP Policy INF-10, relocation of the subject infrastructure would not be feasible as the lines serve an existing residential neighborhood.

The project would not generate a demand for more water supply, wastewater treatment, or increase in the use of other utilities and service systems. The replacement pipelines would accommodate existing service needs and would not substantially increase the collection system capacity or adversely affect wastewater treatment capacity. Thus, the project would not result in the need to expand, relocate, or construct 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. Therefore, there would be **no impact**.

Items D – E: Operationally, the project would not generate solid waste. During construction, some solid waste would be generated, including hundreds of linear feet of vitrified clay pipe (VCP). Most of the old pipelines would be abandoned in place, limiting the amount of solid waste generated by the project. Solid waste generated through project construction would be disposed of at the Monterey Regional Waste Management District facility north of Marina. The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure. The project would not impair the attainment of solid waste reduction goals because improvements to the wastewater collection system are limited in scope and would not generate excess solid waste. The project would comply with all federal, state, and local statutes and regulations related to solid waste. Therefore, impacts would be **less than significant**.

Sources:

- Project file

20. WILDFIRE

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

A. Substantially impair an adopted emergency response plan or emergency evacuation plan?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

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?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
				X

DISCUSSION

Items A - D: The project sites are located within the Local Responsibility Area for Pacific Grove and are not located in a State Responsibility Area. The nearest Very High Fire Hazard Severity Zone is approximately one mile southeast of each project site. The project would involve at or below grade repairs to portions of the City's wastewater collection system and would not result in development of above-grade structures that would be susceptible to wildfire. The proposed project would not pose a risk of fire beyond the normal risks associated with the maintenance of wastewater infrastructure in established residential neighborhoods. The project sites are served by the Monterey Fire Department under a joint service agreement. Therefore, there would be **no impact** related to wildfire.

Sources:

- Project file
- Fire Hazard Severity Zones in LRAs – Pacific Grove (Map of CAL FIRE's Fire Hazard Severity Zones in Local Responsibility Areas – Pacific Grove)

21. MANDATORY FINDINGS OF SIGNIFICANCE

A. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

B. Does the project 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)?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

C. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

IMPACT	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			X	

Item A: As discussed in this Initial Study, the project would have no impact or a less than significant impact with respect to all environmental issues. Regarding biological resources, potential impacts to dune habitat could occur as a result of this proposed project yet would be avoided or minimized by implementing standard Best Management Practices and the Project Design Features as described in Section 9, Description of Project, and Section VI.4, Biological Resources. Regarding cultural resources, potential impacts to any unknown or undiscovered resources within the project area would be less than significant by implementing the City's standard conditions of approval for archaeological and tribal monitoring as described in Section VI.5, Cultural Resources and in Section VI.18, Tribal Cultural Resources. Therefore, potential impacts would be **less than significant**.

Item B: As discussed in this Initial Study, the project would have no impact or a less than significant impact with respect to all environmental issues. Further, most potential impacts would be temporary and construction related. Due to its limited scope, the project would not result in substantial long-term environmental impacts and, therefore, would not result in a substantial contribution to cumulative environmental changes that may occur due to planned and pending development. Therefore, potential impacts would be **less than significant**.

Item C: Effects on human beings are generally associated with impacts related to issue areas such as aesthetics, air quality, greenhouse gas emissions, energy, geology and soils, noise, population and housing, public services, recreation, hazards and hazardous materials, hydrology and water quality, transportation, utilities and service systems, and wildfire. As discussed in this Initial Study, the project would have **no impact** in the resource areas related to geology and soils, hydrology and water quality, population and housing, public services, recreation, and wildfire. As discussed in this Initial Study, the project would have **less than significant** impacts in the resource areas related to

aesthetics, air quality, greenhouse gas emissions, energy, noise, hazards and hazardous materials, transportation, and utilities and service systems. Therefore, as proposed and analyzed in this Initial Study, the issue areas listed above would not require mitigation and the project would not cause substantial adverse effects on human beings, either directly or indirectly, and potential impacts would be **less than significant**.

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FIGURES

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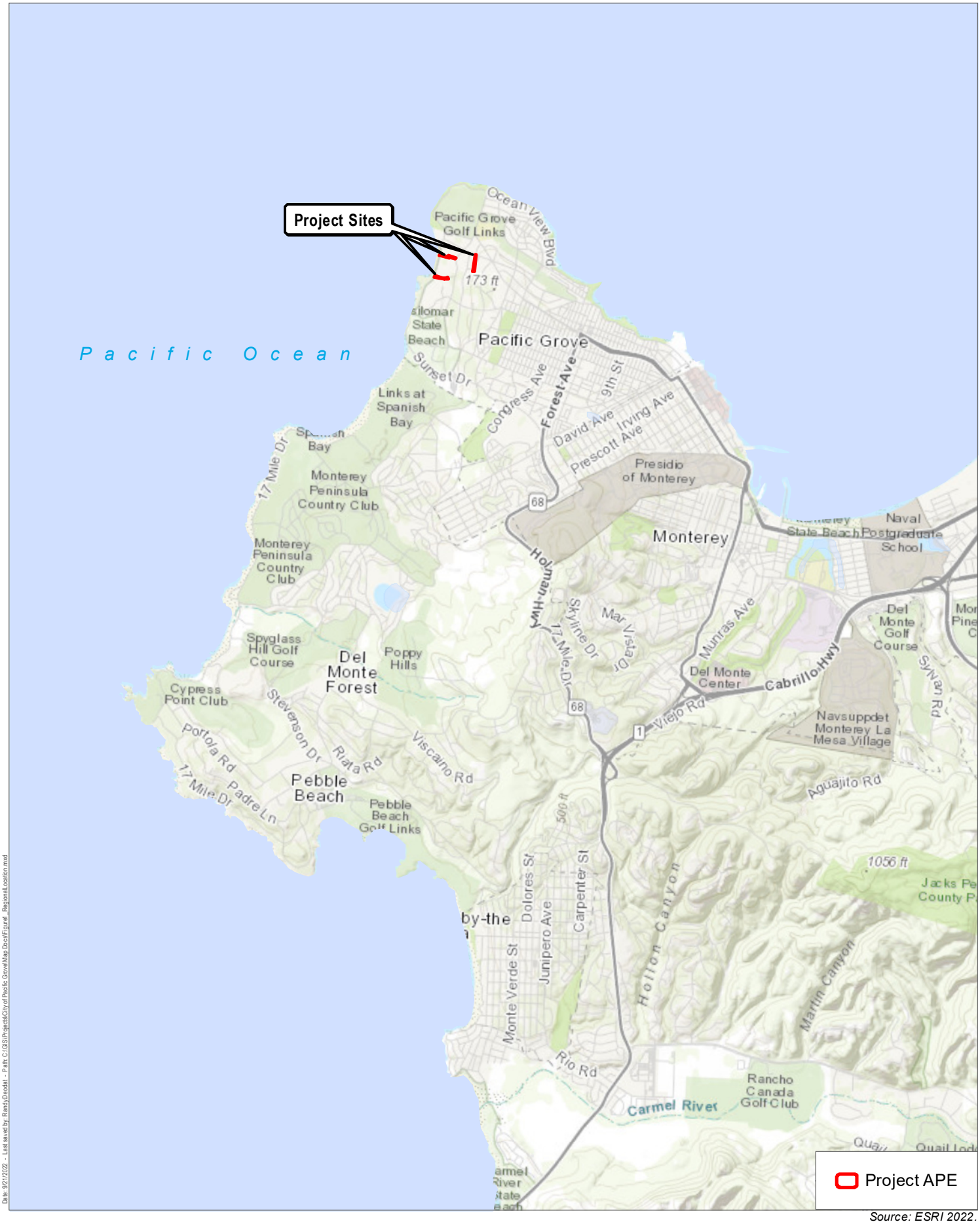

Source: ESRI 2022.

Harris & Associates

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Figure 1

Vicinity Map

Pacific Grove Wastewater Collection System Improvement Project - Phase 9 - Coastal Zones Segments

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Source: Maxar Imagery 2021.

Harris & Associates

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Feet

Figure 2

Project APE

Pacific Grove Wastewater Collection System Improvement Project - Phase 9 - Coastal Zones Segments

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Appendix A – Plan Set

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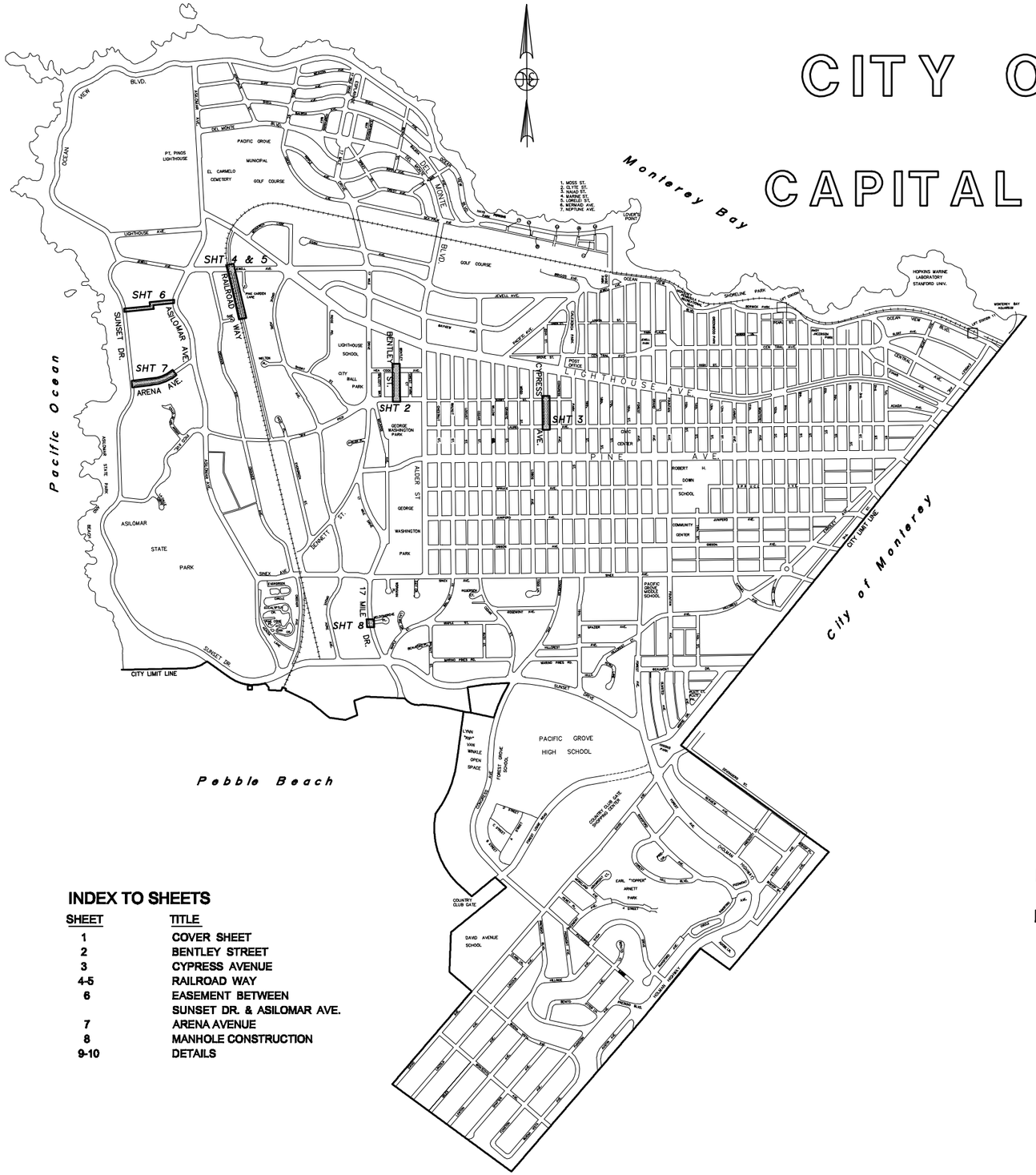
CITY OF PACIFIC GROVE

CAPITAL IMPROVEMENT PROJECT FOR WASTEWATER COLLECTION SYSTEM PHASE 9



INDEX TO SHEETS

SHEET	TITLE
1	COVER SHEET
2	BENTLEY STREET
3	CYPRESS AVENUE
4-5	RAILROAD WAY
6	EASEMENT BETWEEN SUNSET DR. & ASILOMAR AVE.
7	ARENA AVENUE
8	MANHOLE CONSTRUCTION
9-10	DETAILS

LOCATION MAP

CITY OF PACIFIC GROVE COUNCIL

BILL PEAKE, Mayor

JENNY McADAMS, Mayor Pro-Tem — **JOE AMELIO**

LUKE COLETTI — **CHAPS PODURI**

NICK SMITH — **AMY TOMLINSON**

BEN HARVEY, City Manager

DANIEL GHO, Public Works Director

95% SUBMITTAL

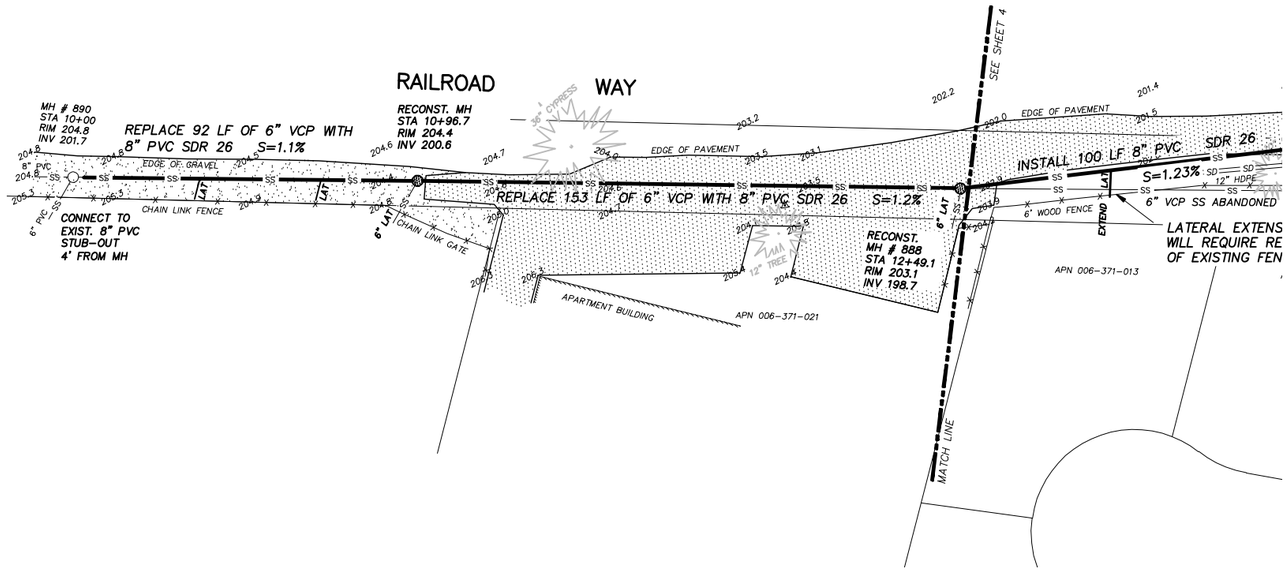
PREPARED BY:

REGISTERED PROFESSIONAL ENGINEER
SHERMAN W. LOH
No. 29411
EXP. 3-31-23
CIVIL
STATE OF CALIFORNIA

NEILL ENGINEERS CORP.
CARMEL, CALIFORNIA

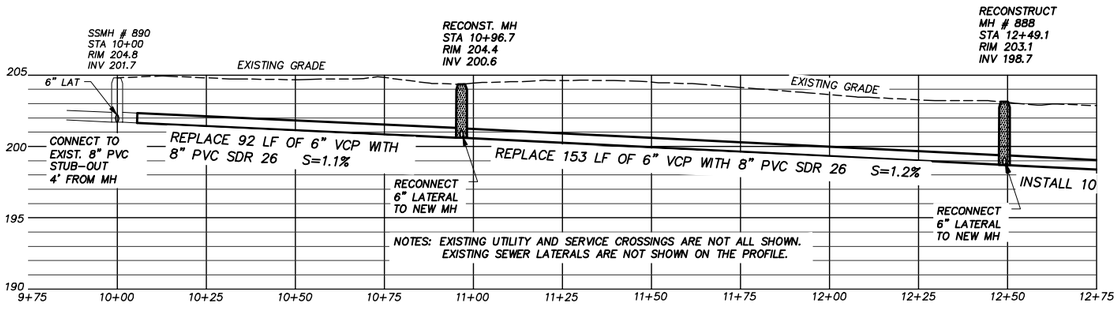
W.O. 8462
JULY 2022
NO SCALE

Registered Civil Engineer No. 29411 Date



LEGEND

- SURVEY CONTROL
- POWER POLE
- G — GAS MAIN
- GS — GAS SERVICES
- SEWER CLEAN OUT
- SEWER OR STORM DRAINAGE MANHOLE
- NEW MANHOLE OR MANHOLE TO BE RECONSTRUCTED
- SD — UNDERGROUND STORM DRAINAGE
- W — WATER MAIN
- WS — WATER SERVICE
- WATER METER
- WATER VALVE
- XX.X — SPOT ELEVATION
- CATCH BASIN
- TREE – DID NOT LOCATE ALL TREES
- SS — EXISTING SANITARY SEWER
- SS — NEW SANITARY SEWER
- LAT — SANITARY SEWER LATERAL
- CAP — SANITARY SEWER CAP
- E — UNDERGROUND ELECTRICAL
- T — UNDERGROUND TELEPHONE DUCT BANK
- SD — STORM DRAIN



PROFILE

SCALE: 1"=20' H
1"=5' V

811 Know what's below. Call before you dig.

NOTES

1. UNDERGROUND UTILITIES AND SERVICES ARE NOT ALL SHOWN. CONTRACTOR SHALL CONTACT U.S.A. (800-227-2600). TO IDENTIFY THE EXACT LOCATION OF ALL UNDERGROUND UTILITIES PRIOR TO CONSTRUCTION.
2. CONTRACTOR SHALL PROVIDE TEMPORARY ABOVE GROUND BYPASS SYSTEM WITH PUMP BETWEEN MANHOLES PRIOR TO MAIN REPLACEMENT.
3. EXISTING SANITARY SEWER LATERALS MAY NOT ALL BE SHOWN. LATERALS SHOWN ARE BASED ON PIPELINE VIDEO INFORMATION PROVIDED BY OTHERS. CONTRACTOR SHALL RECONNECT ALL ACTIVE LATERALS TO NEW WYE IN MAIN. EXISTING CAPPED LATERALS SHALL BE ELIMINATED. EXACT LOCATIONS AND NUMBER TO BE DETERMINED IN THE FIELD AT THE TIME OF CONSTRUCTION.
4. ELEVATIONS ARE BASED ON ASSUMED DATUM ELEVATION MEASUREMENTS ARE IN FEET.

95% SUBMITTAL

C.I.P. PHASE 9

NEILL ENGINEERS CORP. CARMEL, CALIFORNIA

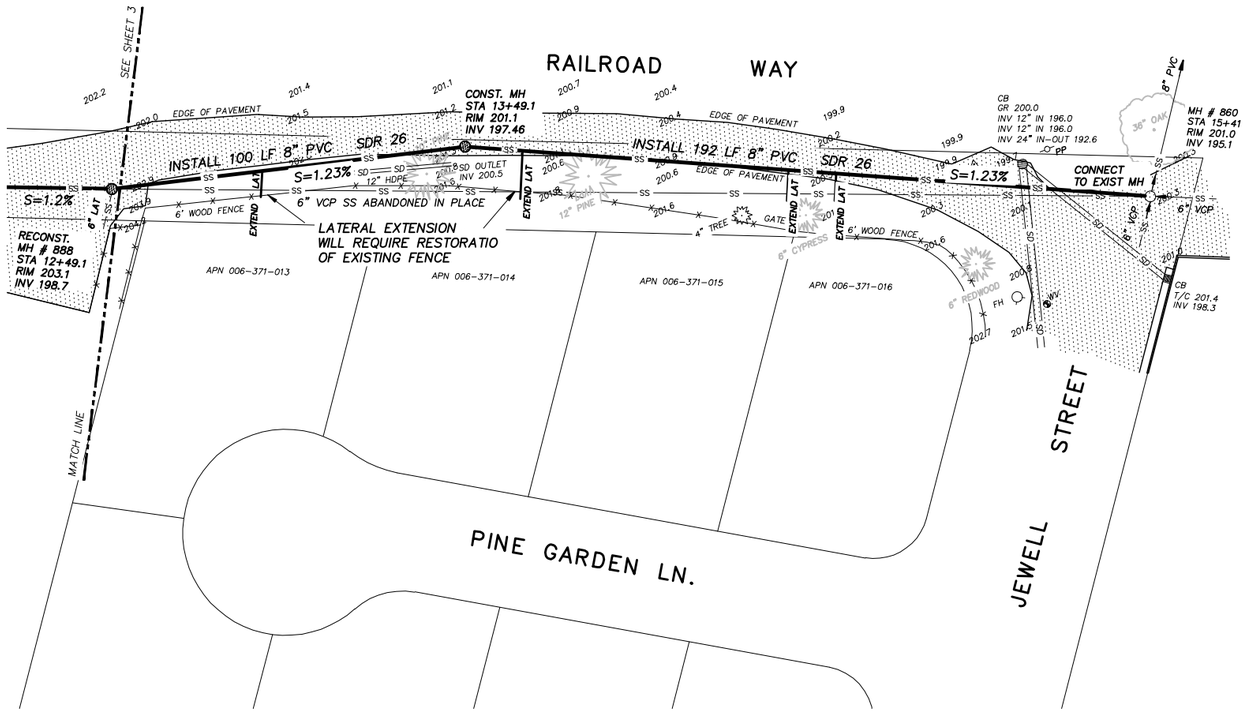
SANITARY SEWER IMPROVEMENTS
RAILROAD WAY

BETWEEN JEWELL AVE. & PICO AVE.

CITY OF PACIFIC GROVE, CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
SHERMAN W. LOW
No. 29411
EXP. 3-31-23
CIVIL
STATE OF CALIFORNIA

W.O. 8462 JULY 2022 SCALE: 1"=20'



SCALE: 1" = 20'

0' 20' 40' 60'

LEGEND

- SURVEY CONTROL
- POWER POLE
- GAS MAIN
- GAS SERVICES
- SEWER CLEAN OUT
- SEWER OR STORM DRAINAGE MANHOLE
- NEW MANHOLE OR MANHOLE TO BE RECONSTRUCTED
- UNDERGROUND STORM DRAINAGE
- WATER MAIN
- WATER SERVICE
- WATER METER
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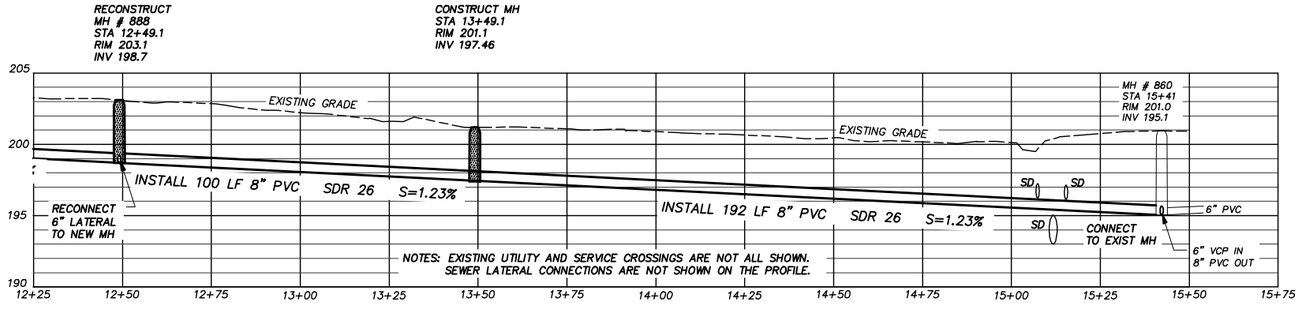
- EXISTING SANITARY SEWER
- NEW SANITARY SEWER
- SANITARY SEWER LATERAL
- SANITARY SEWER CAP
- UNDERGROUND ELECTRICAL
- UNDERGROUND TELEPHONE DUCT BANK
- STORM DRAIN



PROFILE

SCALE: 1"=20' H
1"=5' V

NOTES

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2. CONTRACTOR SHALL PROVIDE TEMPORARY ABOVE GROUND BYPASS SYSTEM WITH PUMP BETWEEN MANHOLES PRIOR TO MAIN REPLACEMENT.
3. EXISTING SANITARY SEWER LATERALS MAY NOT ALL BE SHOWN. LATERALS SHOWN ARE BASED ON PIPELINE VIDEO INFORMATION PROVIDED BY OTHERS. CONTRACTOR SHALL RECONNECT ALL ACTIVE LATERALS TO NEW WYE IN MAIN. EXISTING CAPPED LATERALS SHALL BE ELIMINATED. EXACT LOCATIONS AND NUMBER TO BE DETERMINED IN THE FIELD AT THE TIME OF CONSTRUCTION.
4. ELEVATIONS ARE BASED ON ASSUMED DATUM ELEVATION MEASUREMENTS ARE IN FEET.

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REGISTERED PROFESSIONAL ENGINEER
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EXP. 3-31-23
CIVIL
STATE OF CALIFORNIA

95% SUBMITTAL

C.I.P. PHASE 9

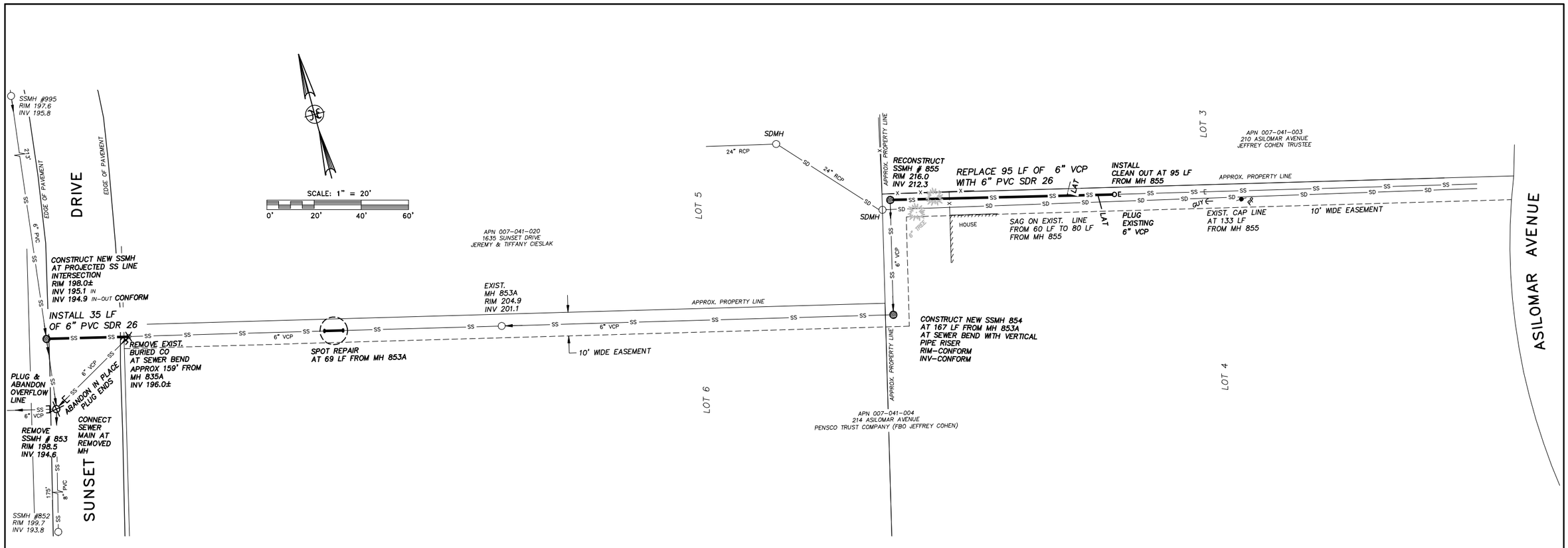
NEILL ENGINEERS CORP. CARMEL, CALIFORNIA

SANITARY SEWER IMPROVEMENTS
RAILROAD WAY

BETWEEN JEWELL AVE. & PICO AVE.

CITY OF PACIFIC GROVE, CALIFORNIA

W.O. 8462 JULY 2022 SCALE: 1"=20'



NOTES

1. EXISTING SANITARY SEWER AND STORM DRAIN FACILITIES ARE SHOWN DIAGAMMATICALLY ONLY. EXISTING TREES, FENCES, BUILDINGS, AND OTHER TOPOGRAPHIC FEATURES ARE NOT IDENTIFIED. CONTRACTOR SHALL BE RESPONSIBLE TO VISIT THE SITE AND MAKE HIS OWN DETERMINATION OF EXISTING SITE CONDITIONS.
2. UNDERGROUND UTILITIES AND SERVICES ARE NOT ALL SHOWN. CONTRACTOR SHALL CONTACT U.S.A. (800-227-2600). TO IDENTIFY THE EXACT LOCATION OF ALL UNDERGROUND UTILITIES PRIOR TO CONSTRUCTION.
3. CONTRACTOR SHALL PROVIDE TEMPORARY ABOVE GROUND BYPASS SYSTEM WITH PUMP BETWEEN MANHOLES PRIOR TO MAIN REPLACEMENT.
4. EXISTING SANITARY SEWER LATERALS MAY NOT ALL BE SHOWN. LATERALS SHOWN ARE BASED ON PIPELINE VIDEO INFORMATION PROVIDED BY OTHERS. CONTRACTOR SHALL RECONNECT ALL ACTIVE LATERALS TO NEW WYE IN MAIN. EXISTING CAPPED LATERALS SHALL BE ELIMINATED. EXACT LOCATIONS AND NUMBER TO BE DETERMINED IN THE FIELD AT THE TIME OF CONSTRUCTION.
5. CONTRACTOR SHALL POTHOLE TO VERIFY THE EXACT LOCATIONS OF NEW MANHOLES TO BE CONSTRUCTED.

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LEGEND

- POWER POLE
- GUY — GUY ANCHOR
- CO — SEWER CLEAN OUT
- MH — SEWER OR STORM DRAINAGE MANHOLE
- NEW MANHOLE OR MANHOLE TO BE RECONSTRUCTED
- SD — UNDERGROUND STORM DRAINAGE
- SS — EXISTING SANITARY SEWER
- SS — NEW SANITARY SEWER
- LAT — SANITARY SEWER LATERAL
- CAP — CAP PIPE

95% SUBMITTAL

C.I.P. PHASE 9

NEILL ENGINEERS CORP. CARMEL, CALIFORNIA

SANITARY SEWER IMPROVEMENTS

LOTS 4 & 6, BLOCK 317
PACIFIC GROVE ACRES

EASEMENT BETWEEN SUNSET DR. & ASILOMAR AVE.

CITY OF PACIFIC GROVE, CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
SHERMAN W. LOW
No. 29411
EXP. 3-31-23
CIVIL
STATE OF CALIFORNIA

W.O. 8462 JULY 2022 SCALE: 1"=20'

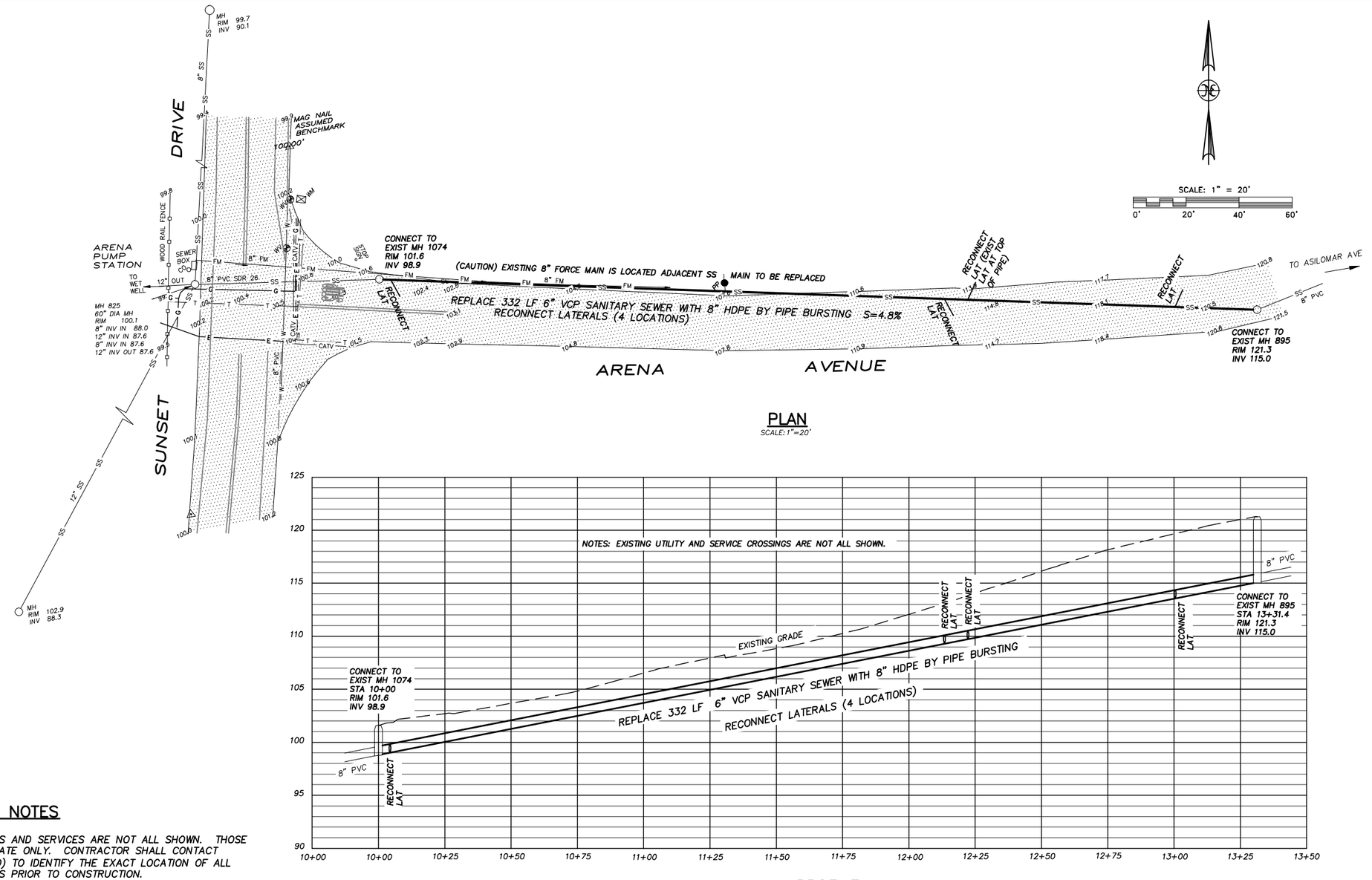
LEGEND:

EXISTING FACILITIES:

- SURVEY CONTROL POINT
- WV — WATER VALVE
- MANHOLE
- GAS — GAS VALVE
- FH — FIRE HYDRANT
- WM — WATER METER
- UB — UTILITY BOX
- SD — STORM DRAIN
- W — WATER MAIN
- T — TELEPHONE CONDUIT
- SS — SANITARY SEWER MAIN
- G — GAS MAIN
- E — UNDERGROUND ELECTRIC LINE
- CATV — UNDERGROUND CABLE TELEVISION
- FM — SANITARY SEWER FORCE MAIN
- SEWER CLEAN OUT
- ASPHALT CONCRETE SURFACE
- xxx.x — SPOT ELEVATION
- WOOD FENCE

NEW FACILITIES:

- SS — SANITARY SEWER MAIN



PLAN

SCALE: 1"=20'

PROFILE

SCALE: 1"=20' H, 1"=5' V

CONSTRUCTION NOTES

1. UNDERGROUND UTILITIES AND SERVICES ARE NOT ALL SHOWN. THOSE SHOWN ARE APPROXIMATE ONLY. CONTRACTOR SHALL CONTACT U.S.A. (800–227–2600) TO IDENTIFY THE EXACT LOCATION OF ALL UNDERGROUND UTILITIES PRIOR TO CONSTRUCTION.
2. CONTRACTOR SHALL PROVIDE TEMPORARY ABOVE GROUND BYPASS SYSTEM WITH PUMP BETWEEN MANHOLES PRIOR TO MAIN REPLACEMENT.
3. LATERALS SHOWN ARE BASED ON PIPELINE VIDEO INFORMATION PROVIDED BY OTHERS. CONTRACTOR SHALL RECONNECT ALL ACTIVE LATERALS TO MAIN. EXISTING CAPPED LATERALS TO BE ELIMINATED. EXACT LOCATIONS AND NUMBER TO BE DETERMINED IN THE FIELD AT THE TIME OF CONSTRUCTION.
4. PRIOR TO PIPE BURSTING, CONTRACTOR SHALL PERFORM A PRE–CCTV INSPECTION OF THE MAIN TO IDENTIFY AND LOCATE EXISTING LATERALS TO BE RECONNECTED, AND TO VERIFY THAT THERE ARE NO CONDITIONS, OBSTRUCTIONS, OR PIPE MATERIALS THAT WILL PREVENT THE MAIN FROM BEING PIPE BURST PROPERLY.
5. LOCATION OF INSERTION PIT FOR PIPE BURSTING TO BE DETERMINED BY CONTRACTOR.
6. ELEVATIONS ARE BASED ON ASSUMED DATUM. ELEVATION MEASUREMENTS ARE IN FEET.

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REGISTERED PROFESSIONAL ENGINEER SHERMAN W. LOW No. 29411 EXP. 3-31-23 CIVIL STATE OF CALIFORNIA

95% SUBMITTAL

C.I.P. PHASE 9

NEILL ENGINEERS CORP. CARMEL, CALIFORNIA

SANITARY SEWER IMPROVEMENTS ARENA AVENUE

BETWEEN SUNSET DRIVE & ASILOMAR AVENUE

CITY OF PACIFIC GROVE, CALIFORNIA

W.O. 8462 JULY 2022 SCALE: 1"=20'

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Appendix B – Biological Resources Letter Report

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Harris & Associates

December 7, 2022

Mr. Daniel Gho
Director of Public Works/Deputy City Manager
City of Pacific Grove
2100 Sunset Drive
Pacific Grove, California 93950

Project: City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9

Dear Mr. Gho:

On October 6, 2022, Harris & Associates (Harris) conducted a biological resources field reconnaissance survey of the proposed City of Pacific Grove (City) Capital Improvement Project for Wastewater Collection System Phase 9 (project) site and a 100-foot survey buffer (approximately 13.5 acres in total), herein referred to as the "survey area" (Attachment 1, Figures; Figure 1, Regional Location, and Figure 2, Survey Area). The purpose of this survey was to identify the presence of existing vegetation communities and to evaluate the potential for occurrence of sensitive plant and wildlife species to assist in early planning and to identify potential biological constraints for developing the project. In addition to the survey results, a review of biological databases is provided in this analysis to aid in the impact evaluation of the project on its current immediate and surrounding environment.

Project Description and Location

Project Description

The purpose of the project is to ensure safe and reliable public wastewater collection service to City residents.

The project includes the repair and replacement of the three segments of the wastewater collection system in the western portion of the City. The three segments include Railroad Way, Asilomar Avenue, and Arena Avenue (Figure 2). A summary of activities to conduct the repairs at the three segments is provided below:

- The Railroad Way segment includes approximately 537 linear feet of pipeline replacement via trenching (not pipe bursting) within the former railroad right-of-way. Planned improvements in this segment include the following:
  - Replacement of 245 linear feet of 6-inch vitrified clay pipe (VCP) with 8-inch polyvinyl chloride (PVC) pipeline
  - Reconstruction of a manhole approximately 92 feet from manhole 890
  - Reconstruction of manhole 888
  - Installation of 292 linear feet of 8-inch PVC pipeline
  - Plugging and in-place abandonment of 292 linear feet of 6-inch VCP pipeline
  - Construction of a new manhole approximately 100 feet from manhole 888
- The Asilomar Avenue segment includes improvements in dune habitat between Sunset Drive and Asilomar Avenue and within the Sunset Drive right-of-way. Planned work in the Sunset Drive roadway includes the following:
  - Replacement of pipeline that is at a 45-degree angle with a new straight section of 35 linear feet of 6-inch PVC pipeline
  - Construction of a new manhole
  - Removal of manhole 853
  - Plugging and abandonment of the angled section of 6-inch VCP pipeline
  - Planned work in the utility easement that extends through dune habitat and private property between Sunset Drive and Asilomar Avenue includes the following:
    - Spot repair 69 feet from manhole 853A
    - Construction of a new manhole (#854) approximately 167 feet from manhole 853A

  - Reconstruction of manhole 855
  - Replacement of 95 linear feet of 6-inch VCP with 6-inch PVC via trenching (cannot pipe burst due to the significant sag in the pipeline)
- The Arena Avenue segment includes excavation of receiving pits and replacement of approximately 332 linear feet of 6-inch VCP with 8-inch high-density polyethylene (HDPE) pipeline (via pipe bursting) within the Arena Avenue right-of-way just east of and including Sunset Drive.

Project activities would be limited to the developed roadways and established access roads in the three segments. No permanent impacts on biological resources would occur during project implementation. Potential temporary, indirect impacts on biological resources could occur and are discussed in the Project Impacts section of this letter report.

Project Design Features

The following project design features (PDFs) have been incorporated into the project design to avoid potential impacts on biological resources on the project site. The PDFs would be incorporated into the construction plans.

PDF-1: Focused Rare Plant Clearance Survey and Avoidance. Before ground-disturbing activities, including digging, clearing, grubbing, and grading, a qualified person shall conduct a pre-construction sensitive plant survey within 100 feet of the project disturbance areas. If sensitive plant species are identified by the qualified person, they shall flag the extent of each species patch or individual in the survey area for avoidance during the pre-construction survey. If sensitive plant species are observed in the impact area during the pre-construction sensitive plant survey or cannot be avoided during implementation, individuals shall be counted, and permanent impacts shall be mitigated at a 1:1 ratio in suitable habitat outside the impact areas as applicable.

PDF-2: Sensitive Habitats Flagging and Fencing. Before ground-disturbing activities, including digging, clearing, grubbing, and grading, a qualified person shall flag and/or install avoidance fencing around the outer limits of the disturbed dune scrub habitat and sensitive Monterey cypress and Monterey pine trees. The flagging and installed avoidance fencing shall remain in place through the end of construction.

PDF-3: Water Quality Protection Measures.

1. Standard construction best management practices for erosion and sediment control, such as the use of silt fencing, shall be implemented to prevent wind and water erosion and to minimize subsequent sedimentation to nearby sensitive habitats and potential aquatic features.
2. The project shall implement the following practices to provide effective temporary and final erosion control during construction as needed:
   a. Preserve existing vegetation where required and when feasible.
   b. Control the area of soil-disturbing operations so the construction contractor can implement erosion-control best management practices quickly and effectively.
   c. Stabilize non-active areas within 14 days of cessation of construction activities or sooner if stipulated by local requirements.
   d. Control erosion in concentrated flow paths by applying temporary erosion-control blankets, check dams, erosion-control seeding, or alternate methods.
   e. Prior to the completion of construction, apply permanent erosion control to any remaining disturbed soil areas.
   f. Maintain sufficient erosion-control materials on site.
3. The following temporary sediment-control best management practices shall be implemented in conformance with the following guidelines and in accordance with the standard best management practice guidance:
   a. **Silt Fence:** As practical and necessary, silt fencing may be placed at the perimeter of disturbed site areas to mitigate discharge of sediment from site stormwater flows.
   b. **Weed-Free, Plastic-Free (No Monofilament) Fiber Rolls:** Fiber rolls may be used for several different applications, including but not limited to perimeter control, grade break and separation, and alternate

check dam. They shall not be used on paved or hardscape media. Temporary fiber rolls installed to control erosion and sedimentation during construction shall be removed once construction is complete.

c. **Stabilized Construction Entrances and Exits:** Stabilized construction entrances and exits shall be placed at ingress and egress points of the disturbance area.

4. Construction padding material, if required, shall be free of any weed seeds, contaminants, or pollutants.
5. No debris, silt, slash, sawdust, rubbish, cement, or concrete, or washings thereof; oil or petroleum products; or other organic or earthen material from any maintenance, construction, or associated activity of any nature shall be allowed to enter or be placed where it may be washed by rainfall or runoff into sensitive habitats and potential aquatic resources in and surrounding the work areas.
6. Construction equipment with visible mud or dirt cakes on tracks, wheels, and undercarriage shall be power washed at a minimum of 100 feet from the limits of work areas to prevent weeds from entering the project site.
7. Construction vehicles and equipment shall be repaired and refueled a minimum of 100 feet from the limits of sensitive habitats and potential aquatic resources within and surrounding the work areas, including the disturbed dune scrub, to the maximum extent feasible. If refueling or repairing equipment or vehicles in or near sensitive habitats or aquatic resources within or surrounding the work areas is unavoidable, appropriate secondary containment shall be employed to prevent spills from entering these sensitive areas. Drip pans and spill containment materials shall always be present and accessible on the construction site.

PDF-4: Nesting Bird Survey. No grubbing, trimming, or clearing of vegetation from the project site shall occur during the general raptor and bird breeding season (January 15 through August 31). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside the general bird breeding season, a qualified person shall perform a pre-construction nesting bird survey no more than 1 week prior to the start of vegetation grubbing, trimming, or clearing to determine if active bird nests are present in the affected areas. Should an active bird nest be located, the qualified person shall establish a buffer and direct vegetation clearing away from the nest until it has been determined that the young have fledged or the nest has failed. If no nesting birds (including nest building or other breeding or nesting behavior) are in the construction area, grubbing, trimming, or clearing shall proceed.

Project Location

The survey area is in the City of Pacific Grove in Monterey County (County), California, at 36.628508 N, −121.935744 W (Figures 1 and 2). The survey area is composed of three segments, Railroad Way, Asilomar Avenue, and Arena Avenue, which differ in vegetation community and land use composition. The Asilomar Dunes and Arena Avenue segments occur within the Asilomar Dunes Environmentally Sensitive Habitat Area and Coastal Zone Planning Area VI of the Pacific Grove Local Coastal Program (LCP) Land Use Plan, which provides policies and guidelines for land use and development in the Pacific Grove Coastal Zone (City of Pacific Grove 2020). The Railroad Way segment is to the east, within the Coastal Zone Planning Area V and outside the Asilomar Dunes habitat area.

Environmental Setting

The following subsections serve to describe the existing conditions in the survey area.

Land Use

The Asilomar Avenue and Arena Avenue segments are in a low-density residential portion of the City and include large, spread-out single-family residential properties including and surrounded by open sand dunes previously altered by development, scattered remnant Monterey pine (*Pinus radiata*) and Monterey cypress (*Hesperocyparis macrocarpa*) trees, and other ornamental species planted for landscaping (Figure 2) (City of Pacific Grove 2020). Sunset Drive, Asilomar State Beach, and the Pacific Ocean coastline border the Asilomar Avenue and Arena Avenue segments of the survey area to the west. The Railroad Way segment includes an established walking trail also used for municipal access that is surrounded by medium-density residential and commercial development and is approximately 0.3 mile east of the Pacific Ocean coastline (Figure 2).

Topography and Soils

The topography of the Asilomar Avenue and Arena Avenue segments is gently sloping, decreasing in elevation from east to west. The topography of the Railroad Way segment is primarily flat. Elevation in the survey area ranges from approximately 20 feet to 105 feet above mean sea level (Figure 3, USGS Topographic Map). The survey area is in Township 15 south, Range 1 west, and Section 14 in the U.S. Geological Survey 7.5-minute Monterey Quadrangle.

The U.S. Department of Agriculture Natural Resources Conservation Service soil series search of the survey area included two soils, Baywood Sand (2 to 15 percent slopes) and Dune Land (USDA 2019) (Figure 4, Soils). A description of each soil series is provided below:

- **Baywood Sand –** The Baywood series consists of deep, somewhat excessively drained soils that formed in old sand dunes near the coast with slopes of zero to 50 percent. This type of soil is typically found within a few miles of the coast from Sonoma to Santa Barbara Counties in California and comprises the majority, approximately 10 acres, of the survey area.
- **Dune Land –** Dune land consists of fine sand composed of primarily quartz and feldspar. It is found predominantly along the coast and comprises approximately 3.5 acres of the survey area.

The soil types that occur in the survey area are not classified as hydric (wetland) soils and do not have potential to contain hydric inclusions (USDA 2019).

Hydrology

The project site is in the Soberanes Creek-Frontal Pacific Ocean Hydrologic Unit of the Central Coast Watershed (180600060203). Based on the National Wetlands Inventory and National Hydrologic Dataset mapping results, no aquatic resources are documented in the survey area (USFWS 2022a; USGS 2022). Two potentially aquatic resources, preliminarily determined to be erosional drainages, were observed in the southern portion of the survey area along Arena Avenue outside the project site. These potential aquatic features were likely constructed or formed from periodic surface stormwater flows directed away from the residence south of the survey area in this location. Upland and developed land surround these two erosional drainages. There is potential for these erosional drainages to flow into the Pacific Ocean, which is defined as a traditional navigable water (TNW) by the U.S. Army Corps of Engineers (USACE), approximately 0.1 mile to the west (USACE 2022).

Further discussion on potentially jurisdictional aquatic resources is provided in the Jurisdictional Aquatic Resources section below.

Climate

The survey area is in Monterey County on the Monterey Peninsula. On a regional level, the County has a Mediterranean climate, which is characterized by wet winters and dry summers. The Monterey Peninsula is defined by the Pacific Ocean and the Santa Lucia Range. Monterey Bay's bottom is 2 miles deep, which lowers the surface temperatures of the bay and influences temperatures inland. Monterey Bay acts as a funnel, channeling ocean air into the Salinas Valley and Santa Lucia Highlands. Habitats in the Monterey County region include both mesic (moist) habitats, such as redwood forest, and xeric habitats, such as coastal scrub. Generalized climate in the region is characterized by warm, dry summers and cold, moist winters, which pushes the growing season to the wet months of the year (late winter to early spring). Vegetation often goes dormant (senescent) during the later summer months until initial rains start in the fall. The rainy season in the County typically lasts from October through March and has an annual winter precipitation average of approximately 18 inches (Western Regional Climate Center 2022).

Regulatory Setting

Federal

Endangered Species Act (U.S. Code, Title 16, Sections 1531 through 1543)

The federal Endangered Species Act and subsequent amendments prohibit the "take" (i.e., harm, harass, or kill individuals, or destroy associated habitat) of species federally listed as threatened or endangered. Take incidental to otherwise lawful activities can be authorized by the U.S. Fish and Wildlife Service (USFWS) through a permit under Sections 4(d), 7, or 10(a).

Migratory Bird Treaty Act (U.S. Code, Title 16, Sections 703 through 711)

The Migratory Bird Treaty Act (MBTA) is the domestic law that affirms or implements a commitment by the United States to four international conventions (Canada, Mexico, Japan, and Russia) for the protection of a shared migratory bird resource. The MBTA makes it unlawful at any time, by any means, or in any manner to pursue, hunt, take, capture, or kill migratory birds. The law also applies to the removal of nests occupied by migratory birds during the breeding season. The MBTA makes it unlawful to take, pursue, molest, or disturb these species, their nests, or their eggs anywhere in the United States.

Clean Water Act

Clean Water Act (CWA), Section 401 (40 CFR 121). Section 401 of the CWA gives the state authority to grant, deny, or waive certification of proposed federally licensed or permitted activities resulting in discharge to waters of the United States. The State Water Resources Control Board directly regulates multi-regional projects and supports the Section 401 certification and wetlands program statewide. The Regional Water Quality Control Board (RWQCB) regulates activities pursuant to Section 401(a)(1) of the federal CWA, which specifies that certification from the state is required for any applicant requesting a federal license or permit to conduct any activity, including but not limited to the construction or operation of facilities that may result in any discharge into navigable waters. The certification shall originate from the state or appropriate interstate water pollution control agency in/where the discharge originates or will originate. Any such discharge will comply with the applicable provisions of Sections 301, 302, 303, 306, and 307 of the CWA.

CWA, Section 404 (33 CFR 328.3[a]). These provisions regulate the discharge of dredged or fill material in waters of the United States, including wetlands. Activities that discharge dredge or fill material into waters of the United States can be authorized by the USACE.

The USACE and the U.S. Environmental Protection Agency (USEPA) have issued a set of guidance documents detailing the process for determining CWA jurisdiction over waters of the United States following the 2008 Rapanos decision. The USEPA and USACE issued a summary memorandum of the guidance for implementing the Supreme Court's decision in Rapanos that addresses the jurisdiction over waters of the United States under the CWA. The complete set of guidance documents, summarized as key points below, was used to collect relevant data for evaluation by the USEPA and USACE to determine CWA jurisdiction over the project and to complete the "significant nexus test" as detailed in the guidelines.

The significant nexus test includes consideration of hydrologic and ecologic factors. For circumstances such as those described in Point B below, the significant nexus test would take into account physical indicators of flow (evidence of an ordinary high water mark [OHWM]) if a hydrologic connection to a TNW exists and if the aquatic functions of the water body have a significant effect (more than speculative or insubstantial) on the chemical, physical, and biological integrity of a TNW. The USACE and USEPA will apply the significant nexus standard to assess the flow characteristics and functions of the tributary drainage to determine if it significantly affects the chemical, physical, and biological integrity of the downstream TNW.

Wetlands (including swamps, bogs, seasonal wetlands, seeps, marshes, and similar areas) are also considered waters of the United States and are defined by the USACE as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances

do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3[b]; 40 CFR 230.3[t]). Indicators of three wetland parameters (i.e., hydric soils, hydrophytic vegetation, and wetlands hydrology), as determined by field investigation, must be present for a site to be classified as a wetland by the USACE (USACE 1987).

Rapanos Guidance Key Points Summary

A. The USACE and USEPA will assert jurisdiction over the following waters:
   - TNWs
   - Wetlands adjacent to TNWs
   - Non-navigable tributaries of TNWs that are relatively permanent (flows 3 months or longer)
   - Wetlands that abut such tributaries

B. The USACE and USEPA will decide jurisdiction over the following waters based on whether they have a significant nexus with a TNW:
   - Non-navigable tributaries that are not relatively permanent
   - Wetlands adjacent to non-navigable tributaries that are not relatively permanent
   - Wetlands adjacent to but that do not directly abut a relatively permanent non-navigable tributary

C. The USACE and USEPA will not assert jurisdiction over the following waters:
   - Swales or erosional features (gullies, small washes characterized by low-volume, infrequent, or short-duration flow)
   - Ditches (including roadside ditches) that are excavated wholly in and draining only uplands and that do not carry a relatively permanent flow of water

The Navigable Waters Protection Rule, published by the USACE and USEPA on April 21, 2020, was vacated during a federal court ruling in Arizona (Pascua Yaqui Tribe v. USEPA) on August 30, 2021. With this ruling, the regulatory agencies have halted implementation of the Navigable Waters Protection Rule and are interpreting "waters of the United States" consistent with the pre-2015 regulatory regime (i.e., Rapanos guidance).

State

Birds of Prey Protection Provision (California Fish and Game Code, Section 3503.5)

This provision prohibits the taking of birds of prey (Orders Falconiformes and Strigiformes), including their nests and eggs.

California Endangered Species Act (California Fish and Game Code, Sections 2050 et seq.)

The California Endangered Species Act prohibits any activities that would jeopardize or take a species designated as threatened or endangered by the state.

Streambed Alteration Agreement (California Fish and Game Code, Section 1600)

The California Fish and Game Code (CFGC) requires any person who proposes a project that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake, or their tributaries or use materials from a streambed to submit a notification for a Streambed Alteration Agreement to the California Department of Fish and Wildlife (CDFW).

California Fish and Game Code, Section 1602

Section 1602 regulates water resources in the State of California. Activities that divert or obstruct the natural flow of or change or use material from the bed, channel, or bank of any river stream or lake may be authorized by the CDFW. CDFW jurisdiction includes intermittent and perennial watercourses and extends to the top of the bank of a stream or lake if unvegetated or to the limit of the adjacent riparian vegetation, located contiguous to the watercourse, if the stream or lake is vegetated.

California Fish and Game Code, Section 3503

Section 3503 of the CFGC prohibits the take, possession, or needless destruction of the nests or eggs of any birds except as otherwise provided by the CFGC or any regulation made pursuant thereto.

California Environmental Quality Act, as Amended (California Public Resources Code, Section 21000 et seq.)

The goal of the California Environmental Quality Act (CEQA) is to assist California public agencies in identifying potential significant negative environmental impacts caused by their actions and avoiding or mitigating those impacts when feasible.

California Fully Protected Wildlife Species Provision (California Fish and Game Code, Sections 3511, 4700, 5050, and 5515)

These provisions prohibit the take of fully protected birds, mammals, amphibians, and fish.

California Native Plant Protection Act of 1977 (California Fish and Game Code, Section 1900–1913)

These provisions preserve, protect, and enhance endangered or rare native plants of the state.

Regional Water Quality Control Board

The RWQCB regulates impacts on water quality under Section 401 of the CWA. A project must comply with Section 401 of the CWA before the USACE can issue a Section 404 Permit. The RWQCB will issue a Section 401 Water Quality Certification or Waiver of Certification depending on the extent of impacts on waters of the United States. The RWQCB also regulates impacts on waters of the state (usually limited to "isolated" waters or swales that may not fall under USACE jurisdiction) under the Porter-Cologne Water Quality Control Act (Porter-Cologne).

Porter-Cologne Water Quality Control Act

The Porter-Cologne is regulated by the RWQCB for impacts on waters of the state. The RWQCB is the regional agency responsible for protecting water quality in California. The jurisdiction of this agency includes waters of the state and waters of the United States as mandated by Section 401 in the CWA and Porter-Cologne. Although water quality issues related to impacts on waterways are normally addressed during Section 401 Water Quality Certification, should a water of the State of California be determined by the USACE to not have CWA jurisdiction, Porter-Cologne would be addressed under a Construction General Permit, State General Waste Discharge Order, or Waste Discharge Requirements depending on the level of impact and the properties of the waterway.

Local

City of Pacific Grove General Plan

The City of Pacific Grove General Plan Natural Resources Element provides the following goals and policies that apply to the project and the vegetation communities, wildlife habitat, and aquatic resources in the survey area (City of Pacific Grove 1994):

- **Goal 1**: Comprehensively manage Pacific Grove's vegetation and wildlife habitat.
  - **Policy 4**: Mitigate development in environmentally sensitive areas.
- **Goal 2**: Protect Pacific Grove's coastal resources.
- **Goal 4**: Protect Pacific Grove's water and marine resources.
  - **Policy 9**: Prohibit the unsafe use of chemical pesticides and herbicides.
- **Goal 5**: Protect Pacific Grove's biological resources.
- **Goal 6**: Protect endangered species.
  - **Policy 12**: Develop methods to maintain endangered species within the Asilomar Dunes neighborhood, Asilomar State Beach and Conference Grounds, the U.S. Coast Guard Reservation, the Pacific Grove shoreline, and other appropriate areas.

City of Pacific Grove Local Coastal Program

The Pacific Grove LCP is a planning tool used by the City in partnership with the California Coastal Commission to guide development in the Pacific Grove Coastal Zone (City of Pacific Grove 2015). The Pacific Grove LCP consists of the City's Land Use Plan and Implementation Plan (Zoning Ordinances, Zoning District Maps, etc.) that implement the provisions and policies of the Pacific Grove LCP (City of Pacific Grove 2020). The Pacific Grove Coastal Zone is broken into seven planning areas. The Land Use Plan contains written policies that provide direction for decision-makers, property owners, and the public regarding the types and intensities of land uses that are most suited to each coastal area. The Pacific Grove LCP requires coastal development permits for any development within the Coastal Zone, including project activities that require grading, design review, and conditional use permits.

The Asilomar Avenue and Arena Avenue segments occur within the Asilomar Dunes Environmentally Sensitive Habitat Area and Coastal Zone Planning Area VI of the Pacific Grove LCP Land Use Plan, which provides policies and guidelines for land use and development in the Pacific Grove Coastal Zone (City of Pacific Grove 2020). The Railroad Way segment is located within Coastal Zone Planning Area V. Therefore, project activities in these three segments are subject to the policies and requirements outlined in the Pacific Grove LCP.

Methods

This biological resources analysis includes the results of a database review and biological resources survey that serve to document the existing biological conditions of the survey area. The results of the database review provide information on the permitting requirements and potential constraints to project construction due to the presence (or lack thereof) of sensitive biological resources.

Database Review

A review of online databases including the CDFW California Natural Diversity Database (CNDDB) (CDFW 2022a), CDFW Biogeographic Information and Observation System (BIOS) (CDFW 2022b), USFWS Information for Planning and Consultation (IPaC) (USFWS 2022b), USFWS National Wetlands Inventory Wetlands Mapper (USFWS 2022a), Consortium of California Herbaria database (CCH 2022), Calflora database (Calflora 2022), and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California (CNPS 2022) was conducted for the project and within a 1-mile radius of the survey area.

Field Reconnaissance Survey

A biological resources survey of the survey area was conducted by a Harris biologist on October 6, 2022. A 100-foot buffer was used for the 2022 biological resources survey where feasible. The survey was conducted by walking meandering transects throughout the survey area and mapping vegetation communities, documenting plant and wildlife species, noting suitable habitat, and evaluating the potential for occurrence of sensitive, rare, threatened, and endangered plant and wildlife species (Attachment 2, Observed Wildlife and Plant Species). Vegetation mapping was recorded in the field using the ArcGIS Collector application with an aerial image of the survey area. A list of plant and wildlife species observed or detected in the survey area was prepared. Plant species were identified in the field or later in the laboratory with the aid of voucher specimens. Wildlife species were identified in the field by direct visual observation with the aid of binoculars or indirectly by detection of calls, tracks, burrows, or scat. The potential for sensitive plant and wildlife species to occur in the survey area is presented in Table 2, Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area, in the Results section.

The results of this analysis provide information on the potential constraints to project development due to the presence of special-status biological resources. No focused wildlife, plant, or other surveys were conducted as part of this analysis.

Survey Limitations

Plants and wildlife were identified by direct observation, vocalizations, or other observance, including tracks, scat, and other signs. Therefore, lists of species observed are not necessarily comprehensive because species can be

outside their blooming period, nocturnal, secretive, or within the region and survey area seasonally (i.e., during migration) and, therefore, may not have been observed.

Some areas within the 100-foot buffer were not accessible on foot due to private property constraints; therefore, these areas were either surveyed with binoculars or avoided entirely.

Results

Vegetation Communities and Land Cover Types

The survey area is in the central western California region of the California Floristic Province (Jepson eFlora 2022). Three vegetation communities and land cover types were identified in the survey area and include disturbed dune scrub, disturbed (ruderal) habitat, and urban/developed land (Holland 1986; CDFW 2022c) (Figure 5, Vegetation Communities and Land Cover Types). Table 1, Vegetation Communities and Land Cover Types in the Survey Area, presents the acreages of the vegetation communities that occur in the survey area. Figure 5 presents the vegetation community and land cover type boundaries.

Table 1. Vegetation Communities and Land Cover Types in the Survey Area

Vegetation Community and Land Cover Type	Survey Area (acres)[1]	Sensitivity Ranking[2]
Scrub-Shrub		
Dune scrub (disturbed)	3.2	G1S1
Disturbed/Developed		
Disturbed (ruderal) habitat	4.1	None
Urban/developed land	6.2	None
Subtotal	*10.3*	—
Total	13.5	—

Sources: Holland 1986; CDFW 2022a, 2022c.
Notes: None = No sensitivity ranking

[1] Acreages rounded up to one-hundredth.

[2] CNDDB rarity ranking. NatureServe Global (G) and State (S) rarity rankings are between 1 and 5 and are interpreted as follows: 1 = critically imperiled; at very high risk of extinction due to extreme rarity (often five or fewer populations), very steep declines, or other factors; 2 = imperiled; at high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors; 3 = vulnerable to extirpation or extinction; at moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors; 4 = apparently secure; uncommon but not rare; some cause for long-term concern due to declines or other factors; 5 = secure; demonstrably widespread, abundant, and secure; common; widespread and abundant (CDFW 2022a).

The vegetation communities observed in the survey area are described in the following subsections.

Scrub-Shrub Vegetation Community

Dune Scrub (Disturbed)

Dune scrub is a dense coastal scrub community of scattered shrubs, subshrubs, and herbs (Holland 1986). Dune scrub is restricted to the coast on stabilized back dune slopes, ridges, and flats and often colonized by foredune species. Typical species includes goldenbush (*Ericameria* sp.), lupines (*Lupinus* sp.), and beach sagewort (*Artemisia pycnocephala*). Dune scrub is considered a sensitive vegetation community (CDFW 2022a).

Approximately 3.2 acres of disturbed dune scrub occurs in the Asilomar Avenue and Arena Avenue segments of the survey area (Figure 5). Previous residential development has completely altered the natural topography of the dunes and altered the plant composition. The disturbed dune scrub in the Asilomar Avenue segment is dominated by non-native Chilean sea fig (*Carpobrotus chilensis*), with coyote brush (*Baccharis pilularis*) and smooth cat's ear (*Hypochaeris glabra*) throughout and shows evidence of modification from the planting of non-native ornamental species from the surrounding residential development. In comparison, the disturbed dune scrub in Arena Avenue segment is dominated by native species, including beach sagewort and dune sedge grass (*Carex pansa*), with

scattered goldenbush, seacliff buckwheat (*Eriogonum parvifolium*), liveforever (*Dudleya* sp.), pink sand verbena (*Abronia umbellata*), California aster (*Symphyotrichum chilense*), and saltgrass (*Distichlis spicata*). Although the dune scrub in the Arena Avenue segment supports more native species, this area is characterized as disturbed because of large open weedy patches, apparent historical modification from the surrounding development, and current disturbance from pedestrians as evidenced by bicycle tire tracks and footprints.

Disturbed (Ruderal) Habitat/Developed Lands

Disturbed (Ruderal) Habitat

Disturbed (ruderal) habitat consists of previously disturbed areas that either are devoid of vegetation (dirt roads/trails) or support scattered non-native plant species, such as escaped ornamentals or ruderal exotic species that take advantage of disturbance, such as short-pod mustard (*Hirschfeldia incana*), black mustard (*Brassica nigra*), filaree (*Erodium* spp.), and other weedy grass species. These species are opportunistic and typically found in recently and/or repeatedly disturbed habitats, particularly in areas that have been graded, have been cleared for fuel management purposes, and/or experience ongoing use that prevents natural revegetation.

Approximately 4.1 acres of disturbed (ruderal) habitat occurs throughout the survey area (Figure 5). Disturbed (ruderal) habitat in the survey area is dominated by ornamentally planted grasses and vegetation, walking trails, and access roads for residences.

Urban/Developed Land

Urban/developed land represents areas that have been constructed on or otherwise physically altered to an extent that native vegetation communities are not supported. This land cover type generally consists of semi-permanent structures, homes, parking lots, pavement or hardscape, and landscaped areas that require maintenance and irrigation (e.g., ornamental greenbelts). Typically, this land cover type is unvegetated or supports a variety of ornamental plants and landscaping.

Approximately 6.2 acres of urban/developed land occurs throughout the majority of the survey area and includes residential properties and transportation infrastructure (Figure 5).

Jurisdictional Aquatic Resources

A formal aquatic resources delineation was not conducted in the survey area during the 2022 biological resources survey. Two potentially jurisdictional aquatic resources were observed in the southern portion of the survey area along Arena Avenue adjacent to a private residence (Figure 6, Potentially Jurisdictional Aquatic Resources). These two features were preliminarily determined to be erosional drainages and were likely constructed or formed from periodic surface stormwater flows directed away from the residence south of the survey area in this location. These two erosional drainages are surrounded by upland, disturbed habitat, and developed land (Figure 6). The two erosional drainages are outside of the project impact area and disturbance of these potential aquatic resources is not expected to occur during construction.

The two erosional drainages observed in the southern portion of the survey area are not documented as aquatic resources based on the National Wetlands Inventory and National Hydrologic Dataset mapping results (USFWS 2022a; USGS 2022). However, if avoidance of these erosional drainages is determined to not be feasible, a formal aquatic resources delineation would be required to establish if they have direct surface water connections to the Pacific Ocean, which is defined as a TNW by the USACE, approximately 0.1 mile to the west (USACE 2022). The formal aquatic resources delineation would be used to determine if the two erosional drainages are under the jurisdiction of the USACE, RWQCB, and CDFW, pursuant to Sections 404 and 401 of the CWA and Section 1602 of the CFGC Lake and Streambed Alteration Agreement.

Plant Species

Attachment 2 lists the vascular plant species observed in the survey area during the 2022 biological resources survey. Seventeen plant species were identified to genus in the survey area, 11 (65 percent) of which were native and six (35 percent) of which were non-native. Two sensitive plant species, Monterey cypress and Monterey pine,

were identified in the survey area during the 2022 biological resources survey (Figure 7, Sensitive Species Observed). An abundance of ornamental plantings is in the survey area due to residential development. It is important to note that the 2022 biological resources survey was conducted outside the blooming period for the majority of the sensitive plant species with potential to occur in the survey area, and these sensitive species may not have been able to be identified because they may have already gone into senescence and could not be identified to species or were no longer above ground and, therefore, not visible for identification.

Arena Avenue can be described as disturbed dune scrub habitat, mixed with disturbed habitat, and developed land. The areas that contain remnant dune scrub habitat have been significantly altered and continue to be highly disturbed by not only the immediate surrounding residential uses and municipal development but also with foot and bicycle traffic. The dominant native plant species were beach (dune) sagewort and coyote brush, followed by seacliff buckwheat and sand dune sedge. Pink sand verbena and an unknown species of stonecrop (liveforever [*Dudleya albiflora*]) succulent were also observed throughout the disturbed scrub area to the west. The dominant non-native species observed was Chilean sea fig.

Asilomar Avenue contained many live and dead Monterey pines. The observed individuals are likely remnants of a long-gone Monterey pine forest that was mostly cleared of trees during construction of the residence occupying this portion of the survey area. This likely significantly modified the amount and coverage of this species. Highly disturbed dune scrub areas are west of the residence and former Monterey pine stand. One Monterey cypress was identified on the far western edge of the survey area long Sunset Drive near the edge of the access road to the residential property on the project site. The project site overall along Asilomar Avenue is dominated by Chilean sea fig. Coyote brush, dune grasses, and California goldenbush (*Ericameria ericoides*) are dotted throughout. Invasive pampas grass (*Cortaderia selloana*) was observed in the north-central portion.

Railroad Way is mostly developed and is characterized by the ornamental planted Bermuda grasses (*Cynodon dactylon*) and other shrubs and trees throughout that line a walking trail through the middle of the area. In the southern portion of Railroad Way is a row of large evergreens, some of which are cypresses. It was not determined what type of cypress they are, but they are potentially Monterey cypress. It is likely that they were purposefully planted along the walking path that also serves as a municipal access road.

The sensitive plant species with potential to occur in the survey area are discussed in the Sensitive Plant and Wildlife Species section.

Wildlife Species

Attachment 2 lists the wildlife species observed in the survey area during the 2022 biological resources survey. Five native wildlife species, red-shouldered hawk (*Buteo lineatus*), American crow (*Corvus brachyrhynchos*), California scrub jay (*Aphelocoma californica*), California mule deer (*Odocoileus hemionus californicus*), and northern Sierran treefrog (*Pseudacris sierra*), were documented as occurring in the survey area. No sensitive wildlife species were observed in the survey area during the 2022 biological resources survey.

Mule deer are abundant in the survey area and in the larger surrounding Pacific Grove area. Mule deer scat was observed on a driveway edge along Arena Avenue. Although the project site contains a large ungulate species in high numbers, it is unlikely that other large mammals are using the survey area as major routes of movement or refugia. A northern Sierran treefrog was heard calling in the area containing pampas grass in the north-central portion of the survey area. The survey area does not provide ample opportunities for sensitive reptile and amphibians due to the highly disturbed nature of the area and dense suburban environment, but some areas may provide foraging, nursery, and refugia opportunities for common species such as Sierran tree frogs and coast range fence lizards (*Sceloporus occidentalis biseriatus*). The Monterey Peninsula is directly within the Pacific Flyway, and it is to be expected that many migratory birds, including seabird species foraging over the open ocean, would be observed. Plenty of nesting opportunities occur for local breeding birds in the many native and ornamental trees and scrub habitat in the survey area. The City is also known as an overwintering monarch butterfly (*Danaus plexippus*) destination where individuals of this species gather and roost by the thousands on eucalyptus

(*Eucalyptus* sp.), cypress (*Hesperocyparis* sp.), and pine (*Pinus* sp.) trees. The survey area contains many pine and several cypress trees that may provide roosting habitat for overwintering monarch butterflies.

The sensitive wildlife species with potential to occur in the survey area are discussed in the Sensitive Plant and Wildlife Species section.

Sensitive Plant and Wildlife Species

This section includes sensitive plant and wildlife species, including nesting birds and critical habitat, as defined by the CDFW, CNPS, and USFWS (CDFW 2022a, 2022b; CNPS 2022; USFWS 2022b). Sensitive species are those recognized by federal or state agencies as being potentially vulnerable to impacts because of rarity, local or regional reductions in population numbers, isolation/restricted genetic flow, or other factors. Sensitive plants include those listed as threatened or endangered, proposed for listing, or candidates for listing by the USFWS and CDFW; those considered sensitive by the CDFW; and those species included in the California Rare Plant Rank (CRPR) inventory maintained by the CNPS. Sensitive wildlife species include those listed as threatened or endangered, proposed for listing, or candidates for listing by the USFWS and CDFW or those considered sensitive by the CDFW.

As described in the Database Review section, distributions of historical sensitive species observations within the project vicinity were reviewed in preparation of this letter report. For the purposes of this biological constraints analysis, those species that either are known to occur or have some potential to occur within the vicinity of the project site are addressed in this section. Figure 8, Sensitive Species with Potential to Occur in the Survey Area, presents the CNDDB database results for sensitive species with potential to occur on the project site and within a 1-mile radius. Database results (i.e., CNPS, IPaC) that did not provide GIS mapping data are listed in Table 2 and are not shown on Figure 8. Table 2 provides the list of sensitive plant and wildlife species that have potential to occur, along with an assessment of their potential for occurrence on the project site. Listing status, habitat requirements, and observation or potential for occurrence information is also provided in Table 2.

Review of the USFWS IPaC database returned 50 migratory bird species protected under the MBTA that are not listed under the federal Endangered Species Act but are otherwise considered sensitive (i.e., USFWS Birds of Conservation Concern) and have known locations within 1 mile of the project site. Although some of these species may be California State Species of Special Concern, no historical locations are known on the project site, and they did not appear on CNDDB search results. Three of these 50 migratory bird species, Allen's hummingbird (*Selasphorus sasin*), Bullock's oriole (*Icterus bullockii*), and Nuttall's woodpecker (*Picoides nuttallii*), have high potential to occur as nesting pairs or found foraging on the project site. These species are discussed in Table 2. The other 47 species either are not expected to be found nesting or foraging on the project site or have low potential to be foraging only and, therefore, are not discussed further in this letter report.

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Plants				
Arctostaphylos hookeri ssp. *hookeri*	Hooker's manzanita	None/None/1B.2	Prefers sandy soils in closed-cone coniferous forest, chaparral, cismontane woodland, and coastal scrub. Blooms Jan.–Jun. Elevation 195–1,760 feet amsl.	*Not Expected.* Databases show several points attributed to Pacific Grove from 1900 and prior, which are likely extirpated (Figure 8). Another location is unspecific; mapped "1.5 miles inland from Point Joe," south of the survey area. Scrub habitat available within the survey area, but area is greatly disturbed. No known locations known within survey area, and the project site is out of the elevational range of this species (CDFW 2022a; CNPS 2022; Calflora 2022).
Arctostaphylos pumila	Sandmat manzanita	None/None/1B.2	Occurs in sandy openings in coastal dunes, coastal scrub, cismontane woodland, maritime chaparral, and closed-cone coniferous forests. Blooms Feb.–May. Elevation 10–675 feet amsl.	*High.* Sandy openings in dune scrub habitat available. Historical location from 1980 mapped as occurring within survey area on western end of Arena Avenue, but individual plant not observed during survey (Figure 8) (CDFW 2022a; CNPS 2022; Calflora 2022).
Arenaria paludicola	Marsh sandwort	FE/SE/1B.1	Found in brackish and freshwater marshes and swamps. Blooms May–Aug. Elevation 10–560 feet amsl.	*Not Expected.* No suitable habitat present. Historical location within 1 mile of survey area (USFWS 2022b). No known locations within survey area (USFWS 2022b).
Astragalus tener var. *titi*	Coastal dunes milk-vetch	FE/SE/1B.1	Found in mesic and vernally mesic habitats, within sandy coastal bluff scrub, mesic coastal prairie, and coastal dune habitats. Blooms Mar.–May. Elevation 5–165 feet amsl.	*Not Expected.* No suitable habitat present. Historical location within 1 mile of survey area (USFWS 2022b). No known locations within survey area (USFWS 2022b).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Castilleja ambigua	Pink Johnny-nip	None/None/1B.1	Occurs in coastal prairie and coastal scrub habitats. Blooms May–Aug. Elevation 0–330 feet amsl.	*Not Expected.* No suitable habitat present. Historical location exists within 0.5 mile southeast of survey area (Figure 8). No known locations within survey area (CDFW 2022a; CNPS 2022; Calflora 2022).
Chorizanthe pungens var. *pungens*	Monterey spineflower	FT/None/1B.2	Occurs in sandy soils in maritime chaparral, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grasslands. Blooms Apr.–Jun. (Jul.–Aug.). Elevation 10–1,475 feet amsl.	*High.* Scrub habitat available within the survey area, but area is greatly disturbed, and no locations known within project site. Historical locations exist less than 0.25 mile from survey area (Figure 8) (CDFW 2022a; CNPS 2022; Calflora 2022).
Clarkia jolonensis	Jolon clarkia	None/None/1B.2	Occurs in chaparral, cismontane woodland, coastal scrub, and riparian woodland. Blooms Apr.–Jun. Elevation 65–2,165 feet amsl.	*Not Expected.* Databases show several points attributed to Pacific Grove from prior to 1910 (Figure 8). Scrub habitat available within the survey area, but area is greatly disturbed, and no known locations within survey area (CDFW 2022a; CNPS 2022; Calflora 2022).
Collinsia multicolor	San Francisco collinsia	None/None/1B.2	Found in closed-cone coniferous forest and coastal scrub. Sometimes in serpentinite habitats. Blooms (Feb.) Mar.–May. Elevation 100–900 feet amsl.	*Not Expected.* This location is unspecific and exact information is not known. Other historical and current known populations are more than 10 miles away from the survey area (CDFW 2022a; CNPS 2022; Calflora 2022).
Delphinium hutchinsonsiae	Hutchinson's larkspur	None/None/1B.2	Occurs in broadleaf upland forest, chaparral, coastal prairie, and coastal scrub. Blooms Mar.–Jun. Elevation 0–1,400 feet amsl.	*Low.* Historical location prior to 1950 and location unspecific in Pacific Grove near "Asilomar" (Figure 8). Scrub habitat available within the survey area, but area is greatly disturbed, and no known locations occur within survey area (CDFW 2022a; CNPS 2022; Calflora 2022).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Erysimum menziesii	Menzies' wallflower	FE/SE/1B.1	Occurs in coastal dunes. Blooms Mar.–Jun. Elevation 0–115 feet amsl.	*High.* Historical location mapped as a polygon that falls within the survey area and project site at Arena Avenue, however, description says Asilomar State Beach in dunes (Figure 8). Survey conducted outside blooming period. Species not observed during survey. Polygon may be larger than individuals exist (Figure 8) (CDFW 2022a; CNPS 2022; Calflora 2022).
Gilia tenuiflora ssp. *arenaria*	Monterey gilia	FE/ST/1B.2	Prefers sandy openings in cismontane woodland, maritime chaparral, coastal dunes, and coastal scrub. Associated with *Lupinus tidestromii* ssp. *tidestromii* and *Polygonum paronychia*. Blooms Apr.–Jun. Elevation 0–150 feet.	*Not Expected.* Historical (before 2000) and recent (2017) locations less than 0.75 mile south of survey area (Figure 8). Sandy openings in dune scrub available on the project site, although habitat is greatly disturbed. No known locations within survey area, and no associations observed within survey area (CDFW 2022a; CNPS 2022; Calflora 2022).
Hesperocyparis macrocarpa	**Monterey cypress**	**None/None/1B.2**	**Occurs in (or as a) closed-cone coniferous forest from 35 to 100 feet amsl. Perennial evergreen tree.**	***Present.* Observed within survey area near Arena Avenue, Asilomar Avenue, and potentially Railroad Way (Figure 7). Historical locations within 1 mile of survey area (Figure 8; CNPS 2022; Calflora 2022).**
Horkelia cuneata var. *sericea*	Kellogg's horkelia	None/None/1B.1	Prefers openings (sometimes gravelly or sandy) in closed-cone coniferous forests, maritime chaparral, coastal dunes, and coastal scrub. Blooms Apr.–Sep. Elevation 35–655 feet amsl.	*Not Expected.* Historical locations prior to 1940 and location unspecific in Pacific Grove near "Asilomar . . . in wind-swept grassy dunes" (Figure 8). Scrub habitat available within the survey area, but area is greatly disturbed and lacks open grassy dunes. No known locations within survey area (CDFW 2022a; CNPS 2022; Calflora 2022).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Layia carnosa	Beach layia	FT/SE/1B.1	Found in sandy coastal scrub and coastal dunes. Blooms Mar.–Jul. Elevation 0–195 feet amsl.	*Low.* Sandy dune scrub habitat present but is highly disturbed. Known from Asilomar State Beach northern end with Tidestrom's lupine in stabilized open dune (Figure 8). Other locations in Pacific Grove likely extirpated. No known locations within survey area (CDFW 2022a; CNPS 2022; Calflora 2022).
Lupinus tidestromii	Tidestrom's lupine	FE/SE/1B.1	Occurs in open coastal dunes from zero to 330 feet amsl. Blooms Apr.–Jun.	*Low.* Known locations near Point Pinos, Asilomar State Beach in dunes near Conference grounds and Sunset Drive, and Moss Beach and Spanish Bay Dunes near golf course (Figure 8). No known locations within survey area. Coastal dunes within survey area, but area is highly disturbed (CDFW 2022a; CNPS 2022; Calflora 2022).
Malacothamnus palmeri var. *involucratus*	Carmel Valley bush-mallow	None/None/1B.2	Prefers openings in chaparral but also found in cismontane woodland and coastal scrub. Blooms Apr.–Oct. Elevation 100–3,610 feet amsl.	*Not Expected.* Historical location is unspecific, and exact information is not known (Figure 8). Other historical and current known populations are more than 5 miles away (CDFW 2022a; CNPS 2022; Calflora 2022).
Microseris paludosa	Marsh microseris	None/None/1B.2	Found in moist valley and foothill grassland, open cismontane woodland, and closed-cone coniferous forest habitats. Blooms Apr.–Jun. (Jul). Elevation 15–1,165 feet amsl.	*Not Expected.* No suitable habitat present. Historical location is unspecific, and information states either further than 1 mile or in pine woods in Pacific Grove (Figure 8). Other historical and current known populations are more than 1 mile away. No known locations within the survey area (CDFW 2022a; CNPS 2022; Calflora 2022).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Monardella sinuata ssp. *nigrescens*	Northern curly-leaved monardella	None/None/1B.2	Occurs in sandy coastal dunes and openings in sandy coastal scrub in Monterey County. Blooms (Apr.) May–Jul. (Sep.). Elevation 0–985 feet amsl.	*Low.* Suitable habitat present, but habitat is disturbed. Historical location is unspecific, and information states it was found in 1932 in stabilized sand dunes (Figure 8). No known locations within the survey area (CDFW 2022a; CNPS 2022; Calflora 2022).
Piperia yadonii	Yadon's rein orchid	FE/None/1B.1	Occurs in sandy coastal bluff scrub, closed-cone coniferous forest, and maritime chaparral. Blooms (Feb.) May–Aug. Elevation 35–1,675 feet amsl.	*Not Expected.* No suitable habitat present. Known locations are extant or possibly extirpated along 17 Mile Drive south of Sinex and north of Navajo and Washington Park, respectively (Figure 8). No known locations within survey area (CDFW 2022a; CNPS 2022; Calflora 2022).
Pinus radiata	**Monterey pine**	**None/None/1B.1**	**Occurs in closed-cone coniferous forest and cismontane woodland.**	***Present.* Multiple living and remnant dead individuals observed within survey area near Asilomar Avenue (Figure 7). Only three native stands of Monterey pines exist in California at Año Nuevo, Cambria, and the Monterey Peninsula. Historical locations are not known within survey area but within 1 mile (CDFW 2022a; CNPS 2022; Calflora 2022).**
Potentilla hickmanii	Hickman's cinquefoil	FE/SE/1B.1	Occurs in coastal bluff scrub, closed-cone coniferous forest, vernally mesic meadows and seeps, and freshwater marshes and swamps. Blooms Apr.–Aug. Elevation 35–490 feet amsl.	*Not Expected.* No suitable habitat present. Historical location within 1 mile from survey area. No known locations within survey area (USFWS 2022b).
Rosa pinetorum	Pine rose	None/None/1B.2	Occurs in closed-cone coniferous forest and cismontane woodland from 5 to 3100 feet. Blooms May–Jul.	*Not Expected.* No suitable habitat present. Known location near Point Pinos Lighthouse (Figure 8). No known locations within survey area (CDFW 2022a; CNPS 2022; Calflora 2022).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Sidalcea malachroides	Maple-leaved checkerbloom	None/None/4.2	Occurs in coastal prairie, broadleaf upland forest, riparian woodland, North Coast coniferous forest, and coastal scrub habitats, often in disturbed areas. Blooms (Mar.) Apr.–Aug. Elevation 0–2,395 feet amsl.	*Low.* Disturbed coastal dune scrub habitat present within project site, but no openings within woodlands available. Known location within 1 mile of survey area but likely extirpated and record is prior to 1890 (Figure 8). No known locations within survey area (CDFW 2022a; CNPS 2022; Calflora 2022).
Trifolium hydrophilum	Saline clover	None/None/1B.2	Occurs in vernal pools, marshes and swamps, and mesic and alkaline valley and foothill grasslands. Blooms Apr.–Jun. Elevation 0–985 feet.	*Not Expected.* No suitable habitat present. Historical locations exist unspecific in region prior to 1905 in open dry ground in forest (Figure 8). No known locations in the survey area (CDFW 2022a; CNPS 2022; Calflora 2022).
Trifolium polyodon	Pacific Grove clover	None/CR/1B.1	Found in granitic or mesic soils in closed-cone coniferous forest, coastal prairie, meadows and seeps, and valley and foothill grasslands. Blooms Apr.–Jun. (Jul.). Elevation 15–1,395 feet amsl.	*Not Expected.* No suitable habitat present. Historical locations exist less than 0.5 mile to the southeast but none in the survey area (Figure 8) (CDFW 2022a; CNPS 2022; Calflora 2022).
Trifolium trichocalyx	Monterey clover	FE/SE/1B.1	Found in burned areas and sandy openings in closed-cone coniferous forest. Blooms Apr.–Jun. Elevation 100–1,000 feet amsl.	*Not Expected.* No suitable habitat present. Historical location within 1 mile from survey area. No known locations within survey area (USFWS 2022b).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Wildlife				
Invertebrates				
Bombus occidentalis	Western bumble bee	RFC/RSC/—	Broadly distributed in western North America along Pacific coast and inland to middle western states. Requires suitable nesting site for colonies, nectar and pollen from floral resources, and suitable overwintering sites for queens. Nests occur primarily in underground cavities such as fossorial mammal burrows and prefer open west–southwest slopes bordered by trees but can be found above ground. Active February to late November.	*Moderate.* Suitable foraging available throughout project site; unknown if nesting potential within survey area. Mostly extirpated from original range and is now largely confined to higher-elevation areas away from development. Historical locations within 1 mile of survey area (collected in 1930s from Point Pinos area) (Figure 8) (CDFW 2022a; USFWS 2022b).
Branchinecta lynchi	Vernal pool fairy shrimp	FT/None/—	Occurs in ephemeral freshwater habitats including roadside ditches and tire ruts, clay flats, vernal lakes, vernal pools, vernal swales, and other season wetlands and depressions in California. Occurs in southern Oregon and 32 counties in California.	*Not Expected.* No suitable vernal pool or other ephemeral pool habitat available in the survey area. Historical locations exist within 1 mile of the survey area (USFWS 2022b).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Danaus plexippus population 1	Monarch butterfly (overwintering population)	FC/None/—	Overwintering roots are in eucalyptus Monterey pines and Monterey cypresses in California.	*High Potential Overwintering; High Potential Migration.* Suitable overwintering habitat available in all three locations in survey area in the pines and cypresses. High potential to fly through. Historical locations exist within 1 mile but none in the survey area (Figure 8) (CDFW 2022a; USFWS 2022b). Pacific Grove contains mass populations of monarchs in winter.
Euphilotes enoptes smithi	Smith's blue butterfly	FE/None/—	Occurs an extremely limited range in Monterey Bay in coastal dune, coastal scrub, chaparral, and grassland habitats that contain seacliff and coast buckwheat.	*Moderate.* Suitable seacliff buckwheat available at Arena Avenue in survey area only, which is highly disturbed. No suitable habitat at other two project site locations. Historical location within 1 mile of project site. No known locations within survey area (USFWS 2022b).
Fish				
Eucyclogobius newberryi	Tidewater goby	FE/None/—	Found in brackish lagoons, estuaries, and marshes along the California coast.	*Not Expected.* No suitable habitat present. Historical location within 1 mile of survey area (USFWS 2022b).
Amphibians				
Rana draytonii	California red-legged frog	FT/ST/—	Breeding habitats are aquatic, typically ephemeral or permanent pools, or backwaters within streams and creeks, also ponds, marshes, springs, dune ponds, lagoons, cattle ponds, and marshes. Requires upland areas for movement and dispersal and areas for refugia and aestivation when waters dry up.	*Not Expected.* No suitable habitat present. Historical location within 1 mile of survey area (USFWS 2022b).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Ambystoma californiense population 1	California tiger salamander – Central California DPS	FT/ST/—	Occurs in grassland, oak savanna, and mixed woodlands edges or lower elevation coniferous forest edges. Will migrate from November through May at night to seek breeding ponds and pools.	*Not Expected.* No suitable habitat present. Historical location within 1 mile from survey area (USFWS 2022b).
Reptiles				
Anniella pulchra ssp. *nigra*	Black legless lizard	None/SSC/—	Occurs in moist warm loose soil with plant cover. Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks. Leaf litter under trees and bushes in sunny areas and dunes stabilized with bush lupine and mock heather often indicate suitable habitat.	*Low.* Suitable (disturbed) dune habitat is not on beach and is not sparsely vegetated. Collected in 1950s from Point Pinos Lighthouse area (Figure 8). No known historical locations within survey area (CDFW 2022a).
Birds				
Brachyramphus marmoratus (nesting)	Marbled murrelet	FT/SE/—	Spends majority of life on open ocean, resting and feeding in near-shore marine waters (1–3 miles out in waters less than 100 feet), and comes inland to nest in mountains near coast.	*Not Expected Foraging; Not Expected Nesting.* No suitable open ocean habitat present for foraging or mountain habitat for nesting in survey area. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Charadrius alexandrinus nivosus (nesting)	Western snowy plover	FT/SSC/—	Forages along shoreline on open beaches. Nests are shallow scrapes or depressions on flat, open sandy areas or areas with saline substrates where driftwood and vegetation are absent or sparse.	*Not Expected Foraging; Not Expected Nesting.* No suitable habitat present. Dune scrub habitat is too dense with vegetation and highly disturbed. Known historical locations within 1 mile are prior to 1920 and are unspecific (Figure 8). No historical locations within survey area (CDFW 2022a; USFWS 2022b).
Coccyzus americanus occidentalis (nesting)	Western yellow-billed cuckoo	FT/SE/—	Breeds in low- to moderate-elevation native forests lining river and streams in western United States. Prefers cottonwood-willow forests.	*Not Expected Foraging; Not Expected Nesting.* No suitable cottonwood-willow riparian or stream/riverside habitat present for foraging or mountain habitat for nesting in survey area. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).
Coturnicops noveboracensis (nesting)	Yellow rail	BCC/SSC/—	Nests in shallow freshwater sedge marshes; winters in wet meadows and marshes with cordgrass, saltgrass, sedges, and other low vegetation.	*Not Expected Foraging; Not Expected Nesting.* No suitable marsh or meadow habitat present. Known historical locations within 1 mile are prior to 1980 from Crespi Pond (Figure 8). No historical locations within survey area (CDFW 2022a; USFWS 2022b).
Empidonax traillii extimus (nesting)	Southwestern willow flycatcher	FE/SE/—	Breeds in patchy to dense riparian habitats with water present. Usually found in riparian woodlands with a well-developed canopy and a thick understory but not uniformly dense. Restricted to a few known breeding sites in San Diego County.	*Not Expected Foraging; Not Expected Nesting.* No suitable riparian habitat present for foraging or nesting. Historical locations exist within 1 mile of the survey area but not within (USFWS 2022b).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Gymnogyps californianus	California condor	FE/SE/—	Occurs in rocky, forested regions including canyons, gorges, and mountains. Nests mainly in cavities or caves in cliffs but occasionally uses trees (redwoods).	*Not Expected Foraging; Not Expected Nesting.* No canyons or remote gorge/mountain habitat required to support foraging and nesting California condors are available within survey area. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).
Icterus bullockii	Bullock's oriole	BCC/None/—	Found in riparian and open woodlands, including in urban parks. Prefers large trees (sycamores, cottonwoods, willows, deciduous oaks, madrones, and large mesquites) spaced far apart or in isolated clumps.	*Low Foraging; Low Nesting.* Habitat required to support foraging and nesting Bullock's orioles is available along Railroad Way and Arena Avenue but not Asilomar Avenue. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).
Laterallus jamaicensis coturniculus (nesting)	California black rail	None/ST; FP/—	Found in tidal marsh areas and wet meadows with tulles and reeds. Extirpated from most of historical range in California; mostly found in San Francisco Bay Area now.	*Not Expected Foraging; Not Expected Nesting.* Habitat required to support foraging and nesting California black rails is not available in the survey area. No tidal marshes, marshes, or wet meadows available with adequate reed or rush species for refugia/foraging. Historical locations exist within 1 mile of survey area but not within (Figure 8) (CDFW 2022a).
Picoides nuttallii	Nuttall's woodpecker	BCC/None/—	Occurs within wooded canyons, foothills, and woods along rivers. Typically found near oaks, and where oaks meet rivers, and pine-oak woodlands in foothills. Also found in riverside cottonwood trees, sycamores, and willows if oaks not present.	*Moderate Foraging; Moderate Nesting.* Pines, cypress, and oak trees available along Railroad Way. Some pines and cypress along Arena Avenue but not Asilomar Avenue. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Pterodroma sandwichensis	Short-tailed albatross	FE/SSC/—	Forages over open ocean. Breeds in several colonies in small island groups south of Japan (most colonies on slopes of Torishima Island).	*Not Expected Foraging; Not Expected Nesting.* No suitable habitat present; project site outside Japan and open ocean. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).
Phoebastria (=*Diomedea*) *albatrus*	Hawaiian petrel	FE/None/—	Nests in burrows primarily in remote montane locations, along large rock outcrops, under cinder cones, under old lichen-covered lava, or in soil beneath dense vegetation on Hawaiian Islands. Forages over open ocean.	*Not Expected Foraging; Not Expected Nesting.* No suitable habitat present; project site outside Hawai‘i and open ocean. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).
Selasphorus sasin	Allen’s hummingbird	BCC/None/—	Nests in trees or shrubs, preferably blackberry, bracken fern, eucalyptus, cypress, and Douglas fir trees. Forages for ants and other tiny insects when nectar is not available.	*High Foraging; High Nesting.* Abundant nectar sources and pines and cypress trees within survey area. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).
Sternula antillarum browni (nesting colony)	California least tern	FE/SE/—	Forages over open oceans, bays, and lagoons. Nests are shallow scrapes or depressions on flat, open sandy areas, or areas with saline substrates where driftwood and vegetation are absent or sparse.	*Not Expected Foraging; Not Expected Nesting.* No suitable habitat present. Dune scrub habitat is too dense with vegetation and highly disturbed. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).
Vireo bellii pusillus (nesting)	Least Bell’s vireo	FE/SE/—	Occurs in riparian scrub and riparian forest and is a summer resident in California below 2,000 feet.	*Not Expected Foraging; Not Expected Nesting.* No suitable riparian habitat present. Known historical locations within 1 mile. No historical locations within survey area (USFWS 2022b).

Table 2. Sensitive Plant and Wildlife Species with Potential to Occur in the Survey Area

Scientific Name	Common Name	Status Federal/State/CRPR	Habitat	Potential to Occur
Mammals				
Enhydra lutris nereis	Southern sea otter	FT/FP/—	Forages in marine coastal areas along the central California coastline, including rocky and sandy areas along the exposed outer coast and protected areas (bays and estuaries).	*Not Expected Foraging.* No suitable habitat marine habitat present. Known historical locations within 1 mile in open ocean. No historical locations within survey area (USFWS 2022b).

Notes: amsl = above mean sea level; None = No status indicated for species
CNPS Rare Plant Ranking: 1B = Species rare, threatened, or endangered in California and elsewhere; 4 = A watch list of species of limited distribution; 0.1 = Species is seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat); 0.2 = Species is moderately threatened in California (20–80 percent occurrences threatened/moderate degree and immediacy of threat).
Federal Status: BCC = Bird of Conservation Concern; FT = federally listed as threatened; FC = federal candidate; FE = federally listed as endangered; RFC = review federal candidacy
State Status: CR = State of California rare; SE = state listed as endangered; ST= state listed as threatened; FP = state listed as fully protected; RSC = review state candidacy; SSC = California species of special concern

Sensitive Plant Species

Two sensitive plant species, Monterey cypress and Monterey pine, were observed during the 2022 biological resources survey (Figure 7). No other sensitive plant species were observed; however, a focused rare plant survey was not conducted. Three other sensitive plant species have high potential to occur in the survey area: sandmat manzanita (*Arctostaphylos pumila*), Monterey spineflower (*Corizanthe pungens* var. *pungens*), and Menzies' wallflower (*Erysimum menziesii*). These five species are discussed in further detail in the following subsections.

Sensitive Plant Species Observed

Monterey Cypress

Monterey cypress is a CNPS CRPR ranked 1B.2 species that is endemic to the Central Coast of California. It is a fast-growing evergreen conifer with an asymmetric crown that is often open and flat topped to widely conic. It bears brown spheric to elliptic cones. This species was once widely distributed along the Central Coast, and now, only two small forest stands are left near Monterey and Carmel where individuals are around 2,000 years old. Monterey cypress are widely planted as an ornamental in California, yet some remnant natural individual trees remain in areas that have long been developed. The two stands that remain are protected, but individuals outside those stands are threatened by continued urban and residential development.

This species was observed along Arena Avenue and Asilomar Avenue (Figure 7). Individuals may be in the stands of Monterey cypress along Railroad Way.

Monterey Pine

Monterey pine is a CNPS CRPR ranked 1B.1 species. It is a coniferous evergreen tree that grows between 49 and 98 feet in height with upward pointing branches and a rounded top. It is native to Santa Cruz, Monterey (Peninsula), and San Luis Obispo Counties in California and the Cedros and Guadalupe Islands in Mexico. It is typically found in closed-cone coniferous forests where it shares dominance with Monterey cypress. A remnant forest stand in the City north of the project site is habitat used by monarch butterflies for overwintering. This species is threatened by continued urban and residential development, as well as encroachment.

Several Monterey pines are throughout the survey area at Asilomar Way (Figure 7). There is high potential for this species to be found at Arena Avenue in the eastern portion of the survey area and along Railroad Way in the disturbed areas between residences.

Sensitive Plant Species Not Observed but with High Potential to Occur

Sandmat Manzanita

Sandmat manzanita is a CNPS CRPR ranked 1B.2 plant. This species is a perennial evergreen shrub endemic to the California coast in and near Monterey. It is a small, low-lying manzanita that forms flat bushes and patchy, creeping mats in sandy soils. The bark is reddish but typically does not shred. Flowers appear in clusters (sparse) and are white to pale pink. It does not grow in areas with direct salt spray, and it is threatened by residential, commercial, and other urban development.

CNDDB research returned three results for sandmat manzanita within 1 mile of the survey area, including one location directly in the survey area (Figure 8). A sandmat manzanita individual was mapped in 1980 (without GPS) in an unspecified location approximately 0.10 mile from Sunset Drive along Arena Avenue, between Asilomar Avenue and Sunset Drive (Figure 8). This individual is considered extant but has not been verified or re-surveyed. This individual was not observed during the 2022 biological resources survey; however, a focused rare plant survey was not conducted. This species has high potential to be found in the survey area.

Monterey Spineflower

Monterey spineflower is a federal listed threatened and CNPS CRPR ranked 1B.2 species. This species of spineflower is endemic to California in Monterey, typically found growing in sandy dune habitats, but also found in chaparral and woodland areas that contain loose, sandy soils. It is a prostrate plant that ascends slightly and has an involucre with white to pink margins. This species is threatened by trampling, urbanization, recreational activities, non-native invasive species, and residential development.

The survey area falls in Monterey spineflower critical habitat. One Monterey spineflower record is known for 1 mile surrounding the survey area (Figure 8). However, the only source for this individual is a 1906 reference for somewhere within 0.20 mile of the CNDDB mapped location. Therefore, this point is unspecified, and the plant may be extirpated by residential development since the date of observation. This species remains in high potential due to the proximity of the previously known location, presence of critical habitat in the survey area, and availability of suitable habitat (sandy dune habitat) on the project site. However, the likelihood of encountering this species is considered low to moderate because the dunes are disturbed and the species has not been recorded in the survey area since 1906.

Menzies' Wallflower

Menzies' wallflower is a federally listed threatened, state listed endangered, and CNPS CRPR ranked 1B.1 plant species. Historically, this species was found in coastal dunes and cliffs in Northern California and southern Oregon. Currently, Menzies' wallflower is known to occur in sandy beach dune habitats in Humboldt, Mendocino, and Monterey Counties. The species can be described as a "mustard-like" biennial or perennial that is short in stature, typically not more than 15 centimeters in height. It has wide yellow petals that are "clawed," and when it is in fruit, the fruit is cylindric when green and flat parallel to septum when dry. This species is removed from its former range by development and military activities and continues to be threatened by recreational activities, urban and residential development, trampling, and non-native invasives species.

CNDDB research shows a polygon of mapped Menzies' wallflower individuals that extends into the survey area along the western edge of the project site at Arena Avenue (Figure 8). The polygon crosses the road and ends at Asilomar State Beach. Information for this occurrence states that the population was mapped on Asilomar State Beach near Spanish Bay. It is unknown if the polygon extends into the project site because individuals were specifically mapped on the project site, or it is a general polygon, and the individuals are confined to the state beach. This species was not observed during the 2022 biological resources survey; however, a focused rare plant survey was not conducted. In addition, this species blooms from April through June, with occasional late-blooming

individuals still flowering in July and August. In addition to this polygon, approximately seven other records of individuals and/or polygons were found within 1 mile of the survey area. Therefore, this species has high potential to be found in the survey area.

Sensitive Wildlife Species

No sensitive wildlife species were observed in the survey area. Two sensitive wildlife species, monarch butterfly overwintering population (*Danaus plexippus* population 1) and Allen's hummingbird, have high potential to occur in the survey area. These two species are discussed in further detail in the following subsections.

Sensitive Wildlife Species Not Observed but with High Potential to Occur

Monarch Butterfly

On December 15, 2020, the USFWS found that adding the monarch butterfly to the list of threatened and endangered species is warranted but precluded by higher-priority species reviews and work. Monarch butterfly is one of the most recognizable butterfly species, with orange wings laced with black lines and bordered with white dots. Its wingspan is 3.7 to 4.1 inches. This species occurs in patches of milkweed (*Asclepias* sp.), the monarch caterpillar host plant. Although larvae only eat milkweed, adult monarchs feed on a variety of nectar-bearing flowers. Monarch butterflies are found across North America wherever suitable feeding, breeding, and overwintering habitat exists. Monarch butterflies overwinter in groves of eucalyptus, cypress, and pine trees along the California coast and high-elevation forests in Mexico (Xerces Society 2017). Threats to this species include habitat loss, climate change, and agriculture.

Typically arriving in October, monarch butterflies cluster on pine, cypress, and eucalyptus trees in the City by the hundreds of thousands in the Pacific Grove Monarch Sanctuary. Some are expected to migrate through and potentially rest on the project site due to its placement within the path of migration and the proximity to the sanctuary. Historical occurrences are documented within 1 mile of the survey area (Figure 8). Cypress and pine trees are available along Arena Avenue and Railroad Way in the survey area. No milkweed patches suitable as host plants for caterpillars to occupy were observed in the survey area; however, there are abundant nectar sources for monarchs to feed.

Allen's Hummingbird

Allen's hummingbird is a USFWS Bird of Conservation Concern. Allen's hummingbird is coppery orange and green hummingbird approximately 3 to 3.5 inches in size, with a straight bill approximately the size of its head. This species can be found wherever nectar sources for feeding are available in or surrounding breeding sites. Nests are typically placed in tall shrubs or trees such as eucalyptus, pine, oak, and cypress trees. They will also nest in riparian areas in cottonwoods, willows, and mulefat.

Allen's hummingbird nests were not observed in the survey area; however, the survey was conducted outside breeding season, and a focused nest survey was not conducted. This species has high potential to be found nesting in the trees and larger shrubs in the survey area because plentiful sources of nectar from native plants and ornamental plantings are in residential gardens.

Nesting Birds

Nesting birds are protected by the MBTA and similar provisions of the CFGC. No bird nests were observed in the survey area. However, the survey was conducted at the end of the breeding season when active bird nests are least likely to be observed. The multitude of buildings and trees and shrubs, both native and non-native, provide plentiful nesting habitat for passerines and raptors. Therefore, there is high potential for birds to be nesting in the survey area.

Roosting Bats

While no bats were observed using the survey area for roosting or foraging during the survey, no nighttime focused acoustic surveys were conducted. Database research results yielded no known historical locations of sensitive bat species in the survey area. However, the availability of suitable roosting habitat (i.e., buildings, rock

crevices, coniferous trees) and suitable foraging habitat (i.e., ornamental plantings) indicates that bats are likely to be found in the survey area. Common species including Mexican free-tailed bats (*Tadarida brasiliensis*), California myotis (*Myotis californicus*), big brown bat (*Eptesicus fuscus*), and hoary bat (*Lasiurus cinereus*), which are habitat generalists or can be found roosting in buildings, crevices, and coniferous forests/trees, are likely to be found in the survey area.

Critical Habitat

Critical habitat for Monterey spineflower occurs in the survey area (Figure 8). USFWS designated critical habitat for Monterey spineflower in 2006 and separated areas into nine specific units. Unit 4, the Asilomar Unit, is approximately 48 acres and consists of coastal dunes and bluffs near the communities of Pacific Grove and Pebble Beach on the Monterey Peninsula in northern Monterey County, including a portion of Asilomar State Beach, extending just beyond Lighthouse Avenue to the north and terminating at the boundary of the Asilomar Hotel & Conference Grounds. The unit's eastern boundary extends from Highway 68 North along Asilomar Avenue, then turns along Arena Avenue, and heads west until it connects with Sunset Drive (USFWS 2006). The entire survey area is included in Unit 4.

Critical habitat for Yadon's piperia (*Platanthera yadonii*) touches into the 1-mile data research buffer in the southeast. No Yadon's piperia critical habitat falls in the survey area. No other critical habitat occurs within 1 mile of the survey area.

Wildlife Corridors and Linkages

Wildlife corridors provide routes for local movement and regional linkages and corridors and often following linear topographic, vegetation, or water features. These corridors can be continuous habitats features, or "stepping stone" areas, providing critical rest and foraging areas for, for example, birds traveling along migratory routes. Local routes of movement provide constant connections to resources that include sources of water, home/cover sites, and foraging areas. Regional linkages and movement corridors provide larger patches of open space to allow relatively free movement of wildlife species along multiple paths between important resources. These areas allow for not only long-term genetic flow between subpopulations but also critical pathways of seasonal/migratory movements. Larger predatory mammals often use regional corridors for hunting and reproduction needs. Potential wildlife corridors can include streams, riparian areas, and culverts under roadways. Habitat characteristics considered included topography, habitat quality, and adjacent land uses.

The California Essential Habitat Connectivity Project has not identified any wildlife movement corridors occurring on or within the vicinity of the project site (CDFW 2022d). The nearest designated wildlife movement corridor is 4.6 miles to the southeast.

The survey area is in a relatively densely populated portion of Pacific Grove that is bordered by the Pacific Ocean. While mule deer, a large ungulate/mammal, are abundant in the survey area, the survey area is unlikely to be used as a major movement corridor for other large mammals due to the disturbance by humans and lack of connectivity to larger open space. Mesocarnivores, including foxes and coyotes, have some potential to be found in the survey area but are not likely to use the area as major routes of movement or for nursey sites. The survey area falls within the Pacific Flyway and, therefore, is used by birds during migration.

Project Impacts

Potential direct and indirect impacts on sensitive plant and wildlife species, sensitive vegetation communities, potentially jurisdictional aquatic resources, and wildlife corridors and habitat linkages are discussed in the following subsections.

Sensitive Plant and Wildlife Species

Direct Impacts

As discussed in the Project Description section, the project has been designed to avoid impacts on sensitive resources to the maximum extent feasible, including the Monterey cypress and Monterey pine trees and the disturbed dune scrub that may have the potential to support sensitive plant and wildlife species. Avoidance of impacts on Monterey cypress would further ensure that impacts would not occur on monarch butterflies potentially using these trees during migration. The proposed area of potential effect occurs in the developed land and disturbed habitat of the roadways and residential properties that have a low likelihood to support sensitive plant and wildlife species due to continued mechanical (and potentially chemical) disturbance (Figure 4). As discussed in the Project Description section, PDF-1, Focused Rare Plant Clearance Survey and Avoidance, and PDF-2, Sensitive Habitats Flagging and Fencing, would require a pre-construction focused rare plant clearance survey and the installation of avoidance flagging and fencing around the sensitive dune habitat and Monterey cypress and Monterey pine trees prior to construction to avoid potential encroachment. Further, construction equipment would remain within developed portions (i.e., paved roads and maintained access roads), and activities set to occur outside these locations would be minor, mostly confined to disturbed areas, and temporary in nature. Therefore, implementation of the project is unlikely to result in impacts on habitat that could support sensitive plant and wildlife species. Direct impacts on sensitive plant species would be less than significant, and no mitigation is required.

Indirect Impacts

Temporary construction-related indirect impacts on sensitive plant and wildlife species generally include trampling, dust generation, pollutant discharges, soil erosion and runoff, noise, vibration, lighting, increased human activity, introduction of non-native and invasive plant species, and accumulation of trash and garbage, which can attract introduced terrestrial, native terrestrial, and avian predators (i.e., corvids, canids, raccoons, and striped skunks). These temporary construction-related impacts in the form of habitat disturbance, dust generation, pollutant discharges, soil erosion and runoff, and increased predation could have a significant impact on the sensitive plant and wildlife species that could occur in the survey area. Implementation of PDF-1 and PDF-2 would require a pre-construction focused rare plant clearance survey and the installation of avoidance flagging and fencing around the sensitive dune habitat prior to construction to avoid potential habitat disturbance. Standard best management practices (BMPs), including those required by PDF-3, Water Quality Protection Measures, for dust suppression measures, erosion- and sediment-control measures (sand and gravel bags, plastic-free [no monofilament] fiber rolls, and silt fencing), use of weed-free erosion-control products, and preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), would be required of the construction contractor. The SWPPP would be prepared pursuant to the National Pollution Discharge Elimination System General Construction Permit (Water Quality Order 99-08-DWQ). The SWPPP would address the potential sources and locations of stormwater contamination characteristics, impacts of specific contaminants, and temporary and permanent erosion-control practices and would include water sampling data, construction practices that minimize stormwater contamination, coordination of BMPs with planned construction activities, and compliance with County, state, and federal regulations. Additional BMPs that would be required during construction include noise suppression measures and trash containment methods. With implementation of PDF-1 through PDF-3 and standard construction BMPs, temporary indirect impacts on sensitive plant and wildlife species observed and with high potential to occur in the survey area would be less than significant, and no mitigation is required.

Nesting Birds and Roosting Bats

As previously discussed, no trees are proposed for removal, and no tree trimming is expected to occur during project construction; therefore, implementation of the project would not remove potential nesting habitat for protected raptors and birds. However, if construction is conducted during the general bird breeding season (January 15 through August 31), PDF-4, Nesting Bird Survey, would require a pre-construction nesting bird survey to avoid direct and indirect impacts on bird species protected under the MBTA and CDFW. Therefore, the project would not result in significant impacts on nesting birds, and no mitigation is required.

Similarly, for roosting bats, no removal of potential roosting habitat in the nearby buildings, rock crevices, and coniferous trees or of suitable foraging habitat in the ornamental plantings in and surrounding the survey area would occur during project construction. Further, no nighttime work is proposed that would disturb bats potentially roosting in or around the survey area. Therefore, the project would not result in significant impacts on roosting bats, and no mitigation is required.

Sensitive Vegetation Communities

Direct Impacts

As discussed under Direct Impacts in the Sensitive Plant and Wildlife Species section, the project has been designed to avoid impacts on sensitive resources to the maximum extent feasible, including the sensitive disturbed dune scrub that occurs in the survey area. Construction would be limited to the paved and dirt roadways that directly border the disturbed dune scrub in the Asilomar Avenue and Arena Avenue segments, avoiding direct impacts on the disturbed dune scrub vegetation (Figure 3). Further, no trees or shrubs would be trimmed or removed during implementation of the project, and as required by PDF-2, sensitive dune habitat, Monterey cypress trees, and Monterey pine trees would be flagged and/or fenced for avoidance prior to construction. The disturbed habitat and developed land in the survey area are not considered sensitive vegetation communities and impacts on these land cover types would be considered less than significant. Therefore, the project would avoid impacts on the sensitive vegetation community disturbed dune scrub in the survey area, no direct impacts would result, and no mitigation is required.

Indirect Impacts

Most of the indirect impacts on sensitive plant species described under Indirect Impacts in the Sensitive Plant and Wildlife Species section also result in potentially significant indirect impacts on sensitive vegetation communities. Indirect impacts on the sensitive vegetation community, disturbed dune scrub, in the survey area could result from invasion by exotic species, exposure to construction-related pollutant discharges, and trampling by humans. As previously discussed, implementation of PDF-2 would require the installation of avoidance flagging and fencing around the sensitive dune habitat prior to construction to avoid potential disturbance. Standard construction BMPs, including those required by PDF-3 for dust suppression measures, erosion- and sediment-control measures (sand and gravel bags, plastic-free [no monofilament] fiber rolls, and silt fencing), use of weed-free erosion-control products, and preparation and implementation of a SWPPP, would be required of the construction contractor during project implementation. With implementation of PDF-2, PDF-3, and standard construction BMPs, indirect impacts on the sensitive vegetation community in the survey area would be less than significant, and no mitigation is required.

Potentially Jurisdictional Aquatic Resources

Direct Impacts

As discussed under Sensitive Plant and Wildlife Species direct impacts, the project has been designed to avoid impacts on sensitive resources to the maximum extent feasible, including potentially jurisdictional aquatic resources that occur in the survey area. Construction activities in the Arena Avenue segment adjacent to the aquatic resources would be limited to the paved roadway and would not disturb the banks or bottom of the drainages. Therefore, the project would avoid impacts on the potentially jurisdictional aquatic resources in the survey area, no direct impacts would result, and no mitigation is required.

Indirect Impacts

Most of the indirect impacts on sensitive plant species and sensitive vegetation communities described for sensitive vegetation communities also result in potentially significant indirect impacts on potentially jurisdictional aquatic resources. Indirect impacts on potentially jurisdictional aquatic resources could result from generation of fugitive dust, changes in hydrology resulting from construction (including sedimentation and erosion), and exposure to construction-related pollutant discharges. As previously discussed under the impacts sections in the Sensitive Plant and Wildlife and Sensitive Vegetation Communities sections, standard construction BMPs,

including those required by PDF-3 for dust suppression measures, erosion- and sediment-control measures (sand and gravel bags, plastic-free [no monofilament] fiber rolls, and silt fencing), use of weed-free erosion-control products, and preparation and implementation of a SWPPP, would be required of the construction contractor during project implementation. With implementation of PDF-3 and standard construction BMPs, indirect impacts on the potentially jurisdictional aquatic resources in the survey area would be less than significant, and no mitigation is required.

Wildlife Corridors and Habitat Linkages

The project would not permanently impact the majority of the survey area, including the existing trees and disturbed dune scrub, and would not impede wildlife movement through the survey area. General wildlife movement routes that may occur through the survey area would remain after implementation of the project. The project would not impact the potential aquatic resources or any other downstream aquatic areas that would interfere with the movement of native resident or migratory fish species. Implementation of the project would not substantially interfere with the movement or established migratory corridors of native resident or migratory fish or wildlife species, including the use of native wildlife nursery sites. Therefore, impacts on wildlife movement corridors would be less than significant, and no mitigation is required.

Local Policies and Ordinances and Habitat Conservation Plans

As previously discussed, the project would not result in significant impacts on sensitive biological resources, including sensitive plant and wildlife species, sensitive vegetation communities, potentially jurisdictional aquatic resources, or wildlife movement corridors. Through implementation of PDF-1 through PDF-4, avoidance of impacts on biological resources, and compliance with the permit requirements of the Pacific Grove LCP, the project would comply with the local policies and ordinances protecting biological resources identified in the Natural Resources Element of the Pacific Grove General Plan and the Pacific Grove LCP (City of Pacific Grove 1994, 2022). Therefore, no impacts on local policies or ordinances would occur from implementation of the project, and no protection measures are required.

The survey area is not in an adopted Habitat Conservation Plan and is not subject to the Natural Community Conservation Planning program. Therefore, no impacts on local conservation plans would occur from implementation of the project, and no protection measures are required.

Conclusions

With implementation of PDF-1 through PDF-4 and avoidance of impacts on biological resources, the project would not result in significant impacts on sensitive plant and wildlife species, nesting birds, roosting bats, sensitive vegetation communities, potentially aquatic resources, and wildlife corridors and habitat linkages. The project would comply with the permit requirements of the Pacific Grove LCP and the local policies and ordinances protecting biological resources identified in the Natural Resources Element of the Pacific Grove General Plan and the Pacific Grove LCP. Therefore, the project would not result in significant impacts on biological resources.

Preparers

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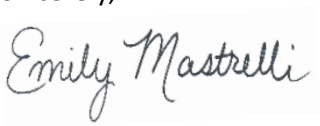
Emily Mastrelli, Principal Biologist
Katie Laybourn, Biologist/Aquatic Resources Specialist

If you have any questions regarding this letter report, please contact me at (619) 510-5372 or Emily.Mastrelli@WeAreHarris.com.

Sincerely,



Emily Mastrelli
Principal Biologist

Attachments

1, Figures

2, Observed Wildlife and Plant Species

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Attachment 1. Figures

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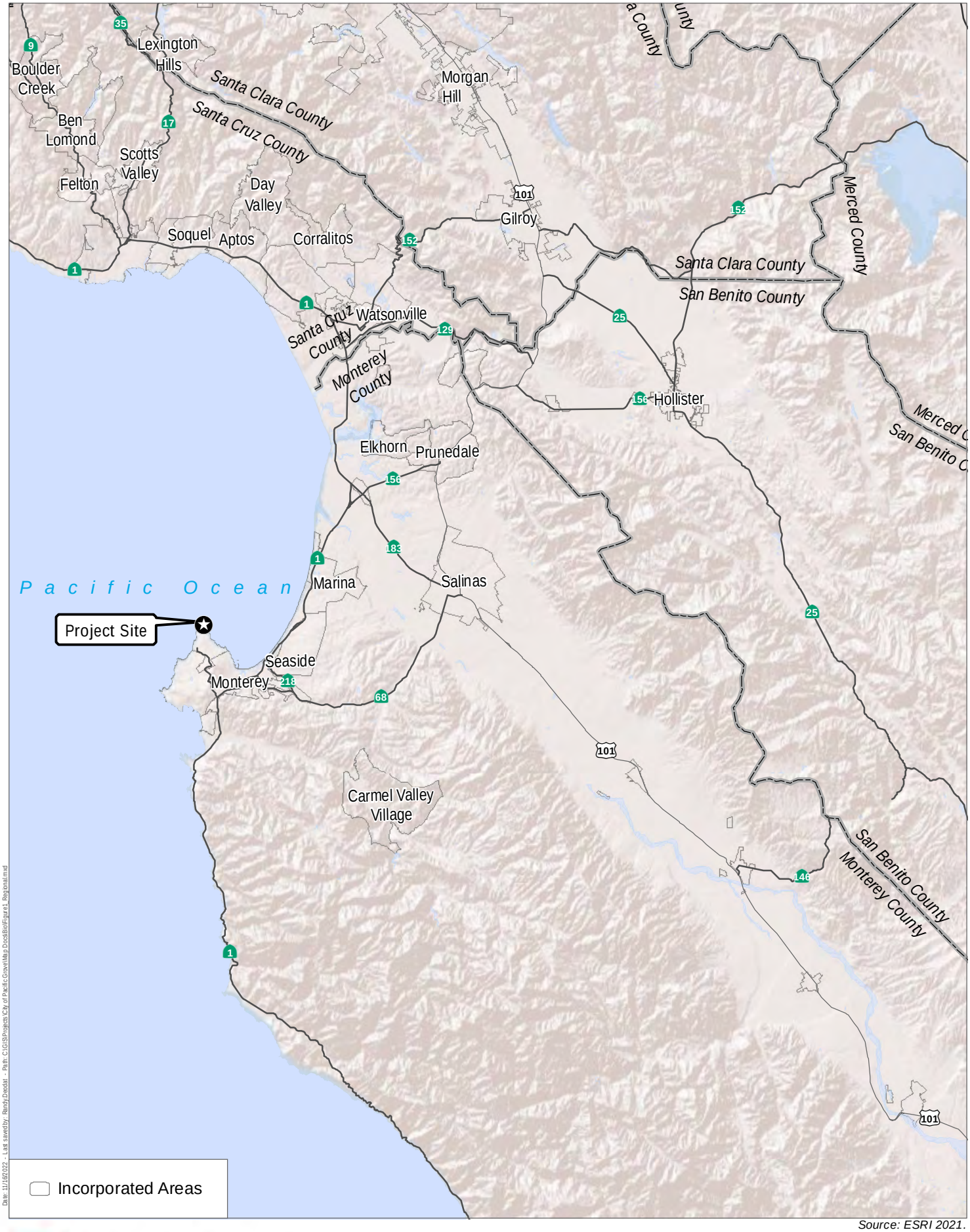


Source: ESRI 2021.

Harris & Associates

Figure 1

Regional Location

City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9

Source: Maxar Imagery 2021.

Harris & Associates

N

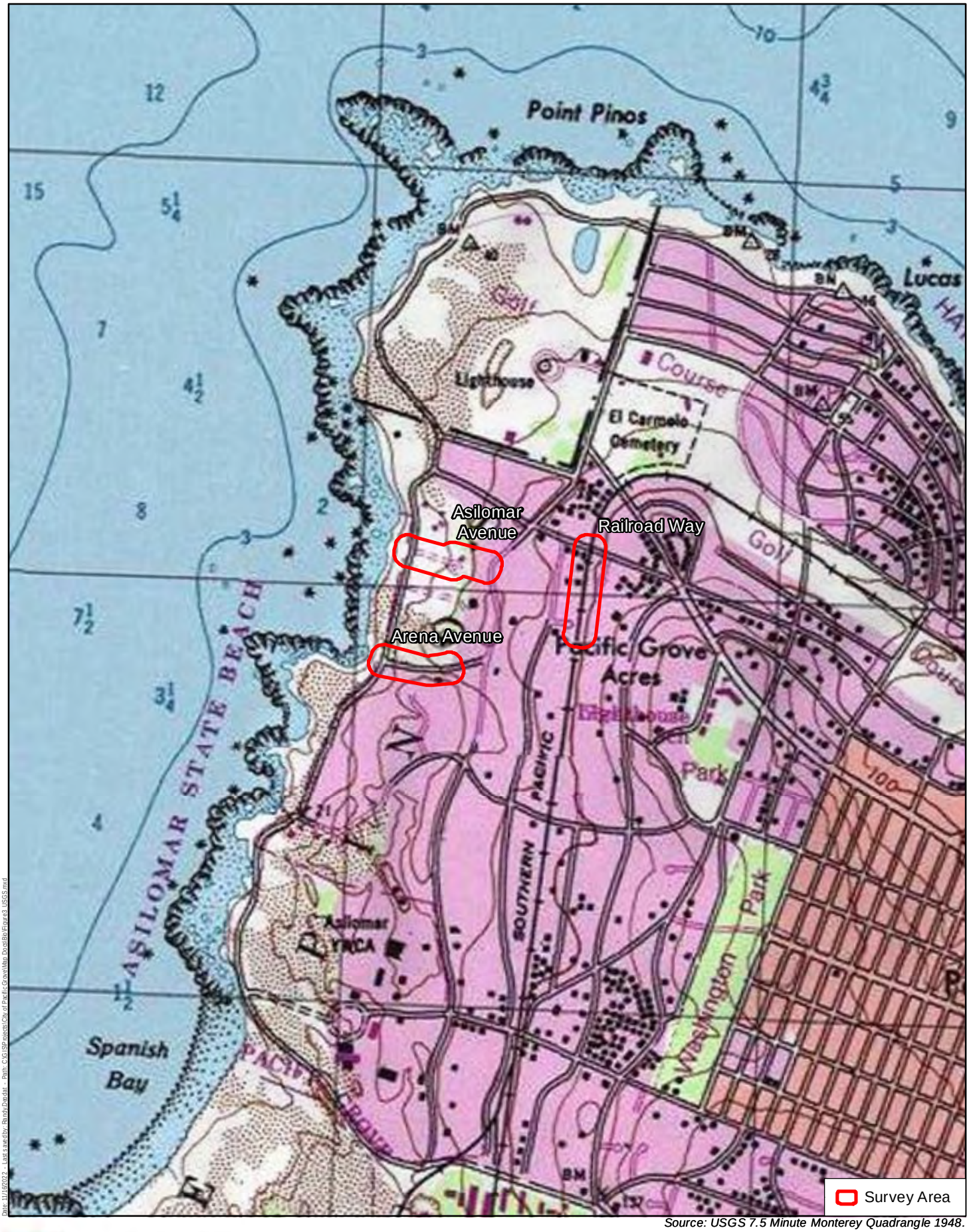
0 250 500

Feet

Figure 2

Survey Area

City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9



Source: USGS 7.5 Minute Monterey Quadrangle 1948.

Harris & Associates

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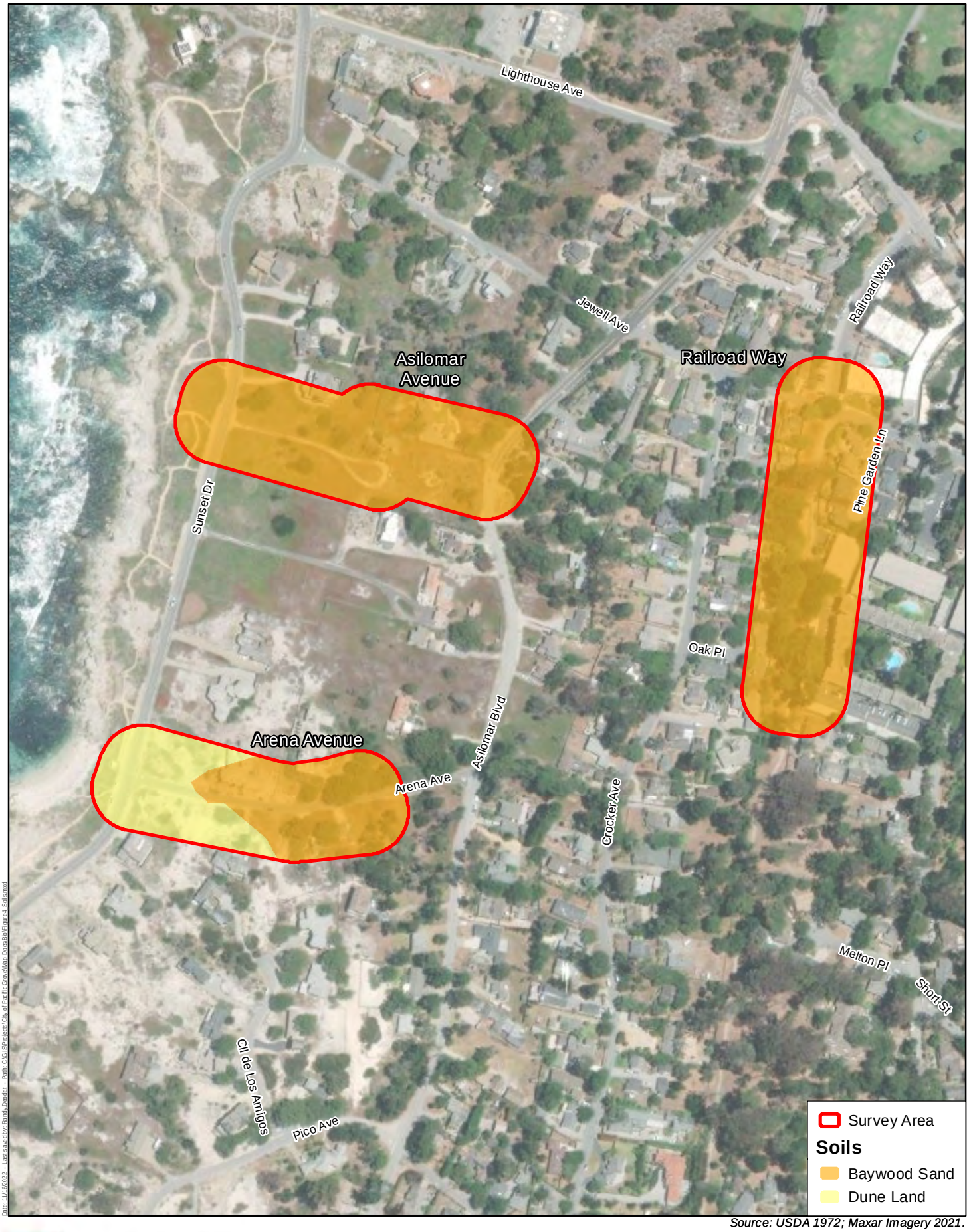
0 500 1,000

Feet

Figure 3

USGS Topographic Map

City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9



Source: USDA 1972; Maxar Imagery 2021.

Harris & Associates

N

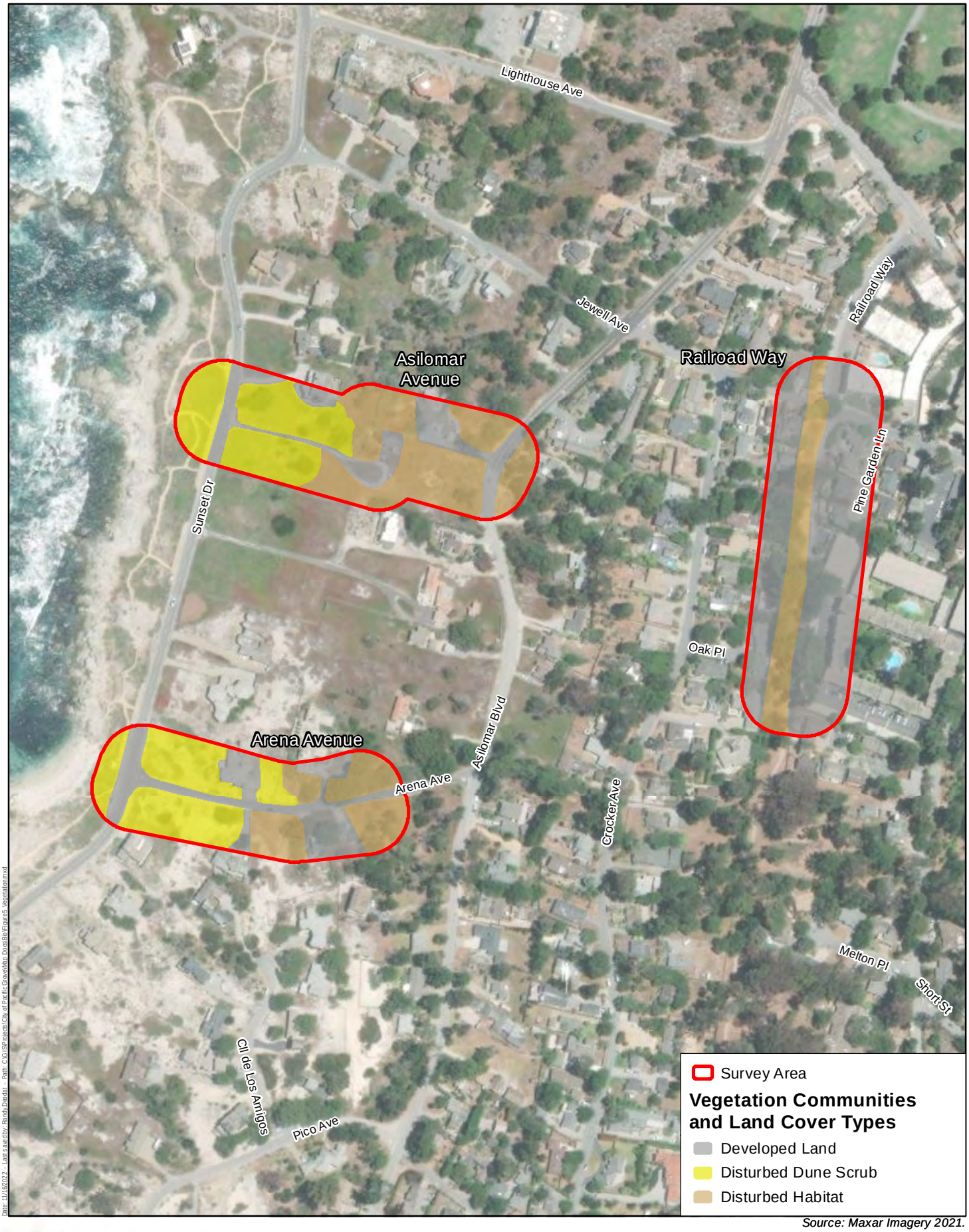
0 150 300

Feet

Figure 4

Soils

City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9



Source: Maxar Imagery 2021.

Harris & Associates

N

0 150 300

Feet

Figure 5

Vegetation Communities and Land Cover Types

City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9

Date: 11/16/2022 - Last saved by: RandyDargatz - Path: C:\GIS\Projects\City of Pacific Grove\Map Docs\IS_MND\Figure6_AquaticResources.mxd

Source: Maxar Imagery 2021.

Harris & Associates

N

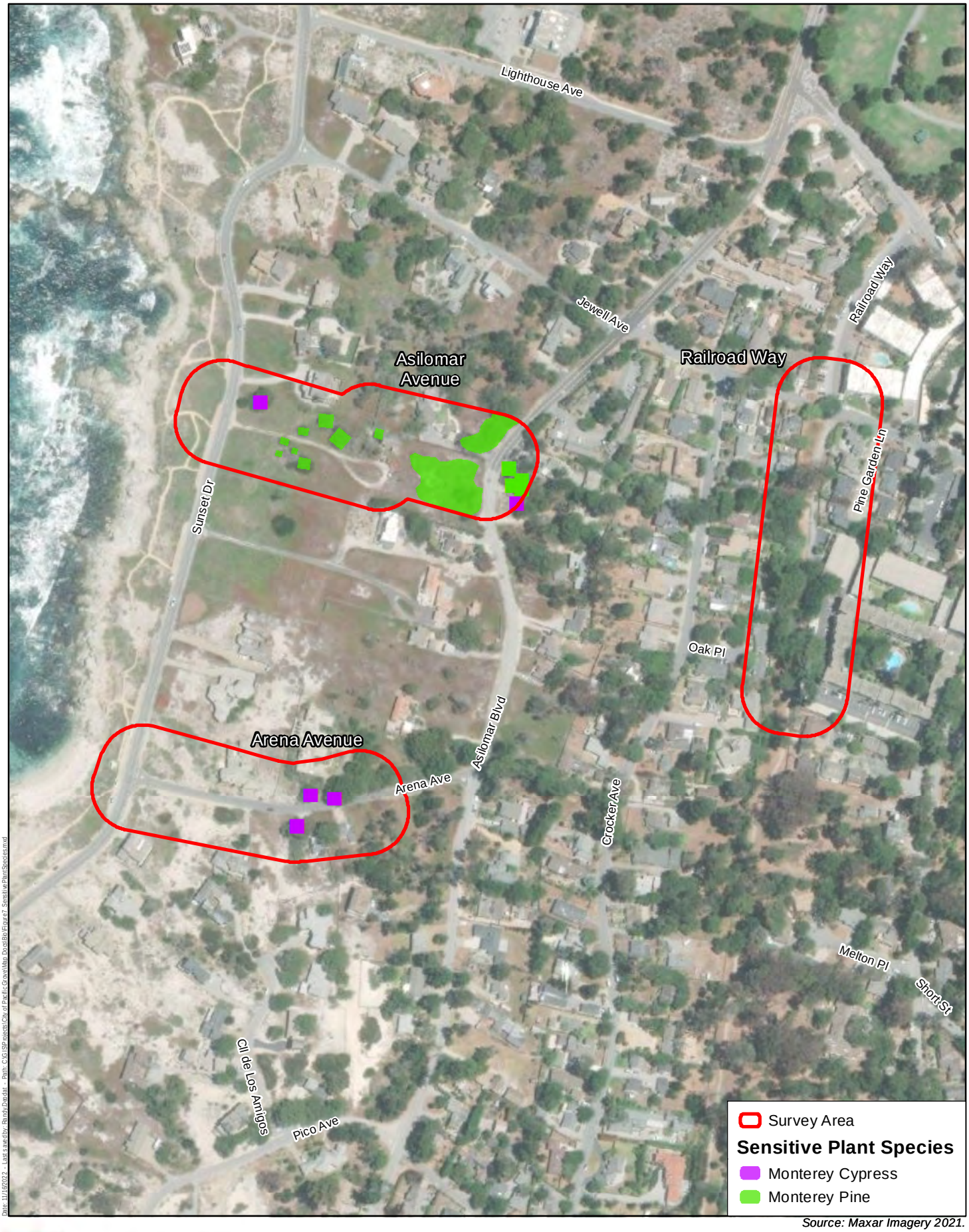
0 50 100

Feet

Figure 6

Potentially Jurisdictional Aquatic Resources

City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9



Source: Maxar Imagery 2021.

Harris & Associates

N

0 150 300

Feet

Figure 7

Sensitive Species Observed

City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9

Survey Area
1-Mile Buffer
Monterey Spineflower Critical Habitat
Yadon's Piperia Critical Habitat

Bird Species

California Black Rail
Western Snowy Plover
Yellow Rail

Invertebrate Species

Monarch Butterfly (Overwintering Population)
Western Bumble Bee

Reptile Species

Black Legless Lizard

Plant Species

Carmel Valley Bush-Mallow
Hooker's Manzanita
Hutchinson's Larkspur
Jolon Clarkia
Kellogg's Horkelia
Menzies' Wallflower
Monterey Gilia
Monterey Pine
Monterey Spineflower
Pacific Grove Clover
Tidestrom's Lupine
Yadon's Rein Orchid
Beach Layia
Maple-Leaved Checkerbloom
Marsh Microseris
Northern Curly-Leaved Monardella
Pine Rose
Pink Johnny-Nip
Saline Clover
Sandmat Manzanita

Source: USFWS 2007, 2008; CNDDB 2022; Maxar Imagery 2021.

Harris & Associates

N

0 1,000 2,000
Feet

Figure 8

Sensitive Species with Potential to Occur in the Survey Area

City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9

Attachment 2. Observed Wildlife and Plant Species

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Table X. Wildlife Species Detected

Scientific Name	Common Name	Special Status
VERTEBRATES		
Amphibians		
Pseudacris sierra	Sierran Treefrog	
Birds		
Buteo lineatus	Red-shouldered Hawk	
Aphelocoma californica	California Scrub-Jay	
Corvus brachyrhynchos	American Crow	
Mammals		
Odocoileus hemionus	California Mule Deer	

Legend

*= Non-native or invasive species

Special Status:

Federal:
FE = Endangered
FT = Threatened

State:
SE = Endangered
ST =Threatened
CSC = California Species of Special Concern
CFP = California Fully Protected Species

Table for Report 3

	Scientific Name	Common Name	Special Status
	GYMNOSPERMS		
	Cupressaceae - Cypress family		
	Hesperocyparis macrocarpa	Monterey cypress	CRPR 1B.2
	Pinaceae - Pine family		
	Pinus radiata	Monterey pine	CRPR 1B.1
	EUDICOTS		
	Aizoaceae - Fig-marigold family		
*	*Carpobrotus chilensis*	Chilean sea fig	
	Asteraceae - Sunflower family		
	Artemisia pycnocephala	Dense fruit sagebrush	
	Baccharis pilularis ssp. pilularis	Coyote brush	
	Corethrogyne filaginifolia	Common sand aster	
	Heterotheca sp.	False goldenaster	
*	*Hypochaeris glabra*	Smooth cat's-ear	
	Brassicaceae - Mustard family		
	Descurainia longipedicellata	Western tansymustard	
	Fabaceae - Legume family		
*	*Acacia longifolia*	Sydney golden wattle	
	Fagaceae - Oak family		
	Quercus sp.	Oak	
	Plantaginaceae - Plantain family		
*	*Plantago coronopus*	Buckhorn plantain	
	Polygonaceae - Buckwheat famil		
	Eriogonum parvifolium	Seacliff buckwheat	
	MONOCOTS		
	Cyperaceae - Sedge family		
	Carex pansa	Sand dune sedge	
	Poaceae - Grass family		
*	*Cortaderia selloana*	Pampas grass	
*	*Cynodon dactylon*	Bermuda grass	
	Distichlis spicata	Salt grass	

Scientific Name	Common Name	Special Status

Legend

*= Non-native or invasive species

Special Status:

Federal:
FE = Endangered
FT = Threatened

State:
SE = Endangered
ST =Threatened

CRPR – California Rare Plant Rank
1A. Presumed extinct in California and elsewhere
1B. Rare or Endangered in California and elsewhere
2A. Presumed extinct in California, more common elsewhere
2B. Rare or Endangered in California, more common elsewhere
3. Plants for which we need more information - Review list
4. Plants of limited distribution - Watch list

Threat Ranks
.1 - Seriously endangered in California
.2 – Fairly endangered in California
.3 – Not very endangered in California

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Appendix C – Cultural Resources Report (cover page only)

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CULTURAL RESOURCES SURVEY LETTER REPORT – NEGATIVE FINDINGS

City of Pacific Grove Capital Improvement Project for Wastewater Collection System Phase 9

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December 2022