RESOLUTION NO. 2018-139

A RESOLUTION OF THE CITY OF MARINA CITY COUNCIL ADOPTING A MITIGATED NEGATIVE DECLARATION PREPARED FOR A COMBINED DEVELOPMENT PERMIT CONSISTING OF: 1) GENERAL PLAN LAND USE MAP AMENDMENT (GP 2016-01) TO CHANGE THE DESIGNATION FROM SINGLE-FAMILY TO MULTIPLE FAMILY RESIDENTIAL; 2) CONDITIONAL USE PERMIT (UP 2016-02) FOR RESIDENTIAL DENSITY OVER 25 UNITS PER ACRE; 3) SITE AND ARCHITECTURAL DESIGN REVIEW (DR 2016-05) FOR THE SITE PLAN, ELEVATIONS, AND LANDSCAPE PLAN FOR A NEW THREE-STORY SEVENTY-ONE (71) UNIT MULTIFAMILY RESIDENTIAL APARTMENT COMPLEX; AND 4) TREE REMOVAL PERMIT (TP 2016-02) FOR THE REMOVAL OF NINE (9) TREES FOR THE VETERAN'S TRANSITION CENTER (VTC) PERMANENT SUPPORTIVE HOUSING PROJECT LOCATED AT 229-239 HAYES CIRCLE (ASSESSOR'S PARCEL NUMBER: 031-021-040).

WHEREAS, on September 22, 2015, Ethan Daniels of EAH Inc., a Non-Profit Housing Corporation, made an initial deposit of development review fees and a project proposal to construct the above described project; and

WHEREAS, entitlements requested include a General Plan Amendment (GP 2016-01) to reclassify the land use designation from "Single Family Residential" to "Multiple-Family Residential"; and

WHEREAS, Public Resources Code Section 21080.d and California Environmental Quality Act (CEQA) Guidelines Section 15064.a.1 require environmental review is there is substantial evidence that the project may have a significant effect on the environment; and

WHEREAS, in compliance with the California Environmental Quality Act, an Initial Study/Mitigated Negative Declaration has been prepared and publicly circulated for a period of 30 days (June 13, 2018 through July 12, 2018) and has been submitted for review and consideration by the Planning Commission; and

WHEREAS, the Initial Study/Mitigated Negative Declaration (SCH No. 2018061033) determined that the project's potentially significant environmental impacts related to: Aesthetics, Biological Resources, Cultural Resources, Geology/Soils, Noise, Tribal Cultural Resources, can be considered to be "less than significant" with mitigation; and

WHEREAS, on October 25, 2018, the Planning Commission of the City of Marina conducted a duly noticed public hearing to consider the Mitigated Negative Declaration of environmental impacts for the Project, considered all public testimony, written and oral, presented at the public hearing and received and considered the written information and recommendation of the staff report for the October 25, 2018 meeting; and

WHEREAS, on November 20, 2018, the City Council of the City of Marina conducted a duly noticed public hearing to consider the Mitigated Negative Declaration of environmental impacts for the Project, considered all public testimony, written and oral, presented at the public hearing and received and considered the written information and recommendation of the staff report for the November 20, 2018 meeting.

NOW, THEREFORE BE IT RESOLVED by the City Council of the City of Marina that it hereby adopts an Initial Study/Mitigated Negative Declaration prepared for a Combined Development Permit Consisting of: 1) General Plan Land Use Map Amendment (GP 2016-01) to Change the Designation from Single-Family to Multiple Family Residential; 2) Conditional Use Permit (UP 2016-02) for Residential Density over 25 Units per Acre; 3) Site and Architectural Design Review (DR 2016-05) for the Site Plan, Elevations, and Landscape Plan for a New Three-Story Seventy-One (71) Unit Multifamily Residential Apartment Complex; and 4) Tree Removal Permit (TP 2016-02)

for the Removal of Nine (9) Trees for the Veteran's Transition Center (VTC) Permanent Supportive Housing Project located at 229-239 Hayes Circle (Assessor's Parcel Number: 031-021-040)

FINDINGS

1. The Initial Study/Mitigated Negative Declaration of environmental impact were released for the public review and the project as proposed and designed would avoid the effects or mitigate the effects to a point of "less than significance.

2. There is no substantial evidence in light of the whole record before the City of Marina that the project may have a significant effect on the environment.

PASSED AND ADOPTED by the City Council of the City of Marina at a regular meeting duly held on the 20th day of November 2018, by the following vote:

AYES, COUNCIL MEMBERS: Amadeo, Morton, O'Connell, Brown, Delgado
NOES, COUNCIL MEMBERS: None
ABSENT, COUNCIL MEMBERS: None
ABSTAIN, COUNCIL MEMBERS: None

Bruce Delgado, Mayor

ATTEST:

Anita Sharp, Deputy City Clerk

Veterans Transition Center Project

Initial Study – Mitigated Negative Declaration

Final Draft

prepared by

City of Marina
209 Cypress Avenue
Marina, California 93933
Contact: Christine Hopper

prepared with the assistance of

Rincon Consultants, Inc.
437 Figueroa Street, Suite 203
Monterey, California 93940

August 2018

Rincon Consultants, Inc.
Environmental Scientists Planners Engineers
www.rinconconsultants.com

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Initial Study

1. Project Title

Veterans Transition Center (Lightfighter Village)

2. Lead Agency Name and Address

City of Marina
211 Hillcrest Avenue
Marina, California 93933

3. Contact Person and Phone Number

Christine Hopper, Planning Services Manager
(831) 884-1238

4. Project Location

The project site is located at 229-239 Hayes Circle on the former Fort Ord in Marina, California (Assessor Parcel Number 031-021-040). Figure 1 shows the regional location. Figure 2 shows the project site location.

5. Project Sponsor's Name and Address

EAH Housing
2169 East Francisco Blvd. Suite B
San Rafael, California 94901

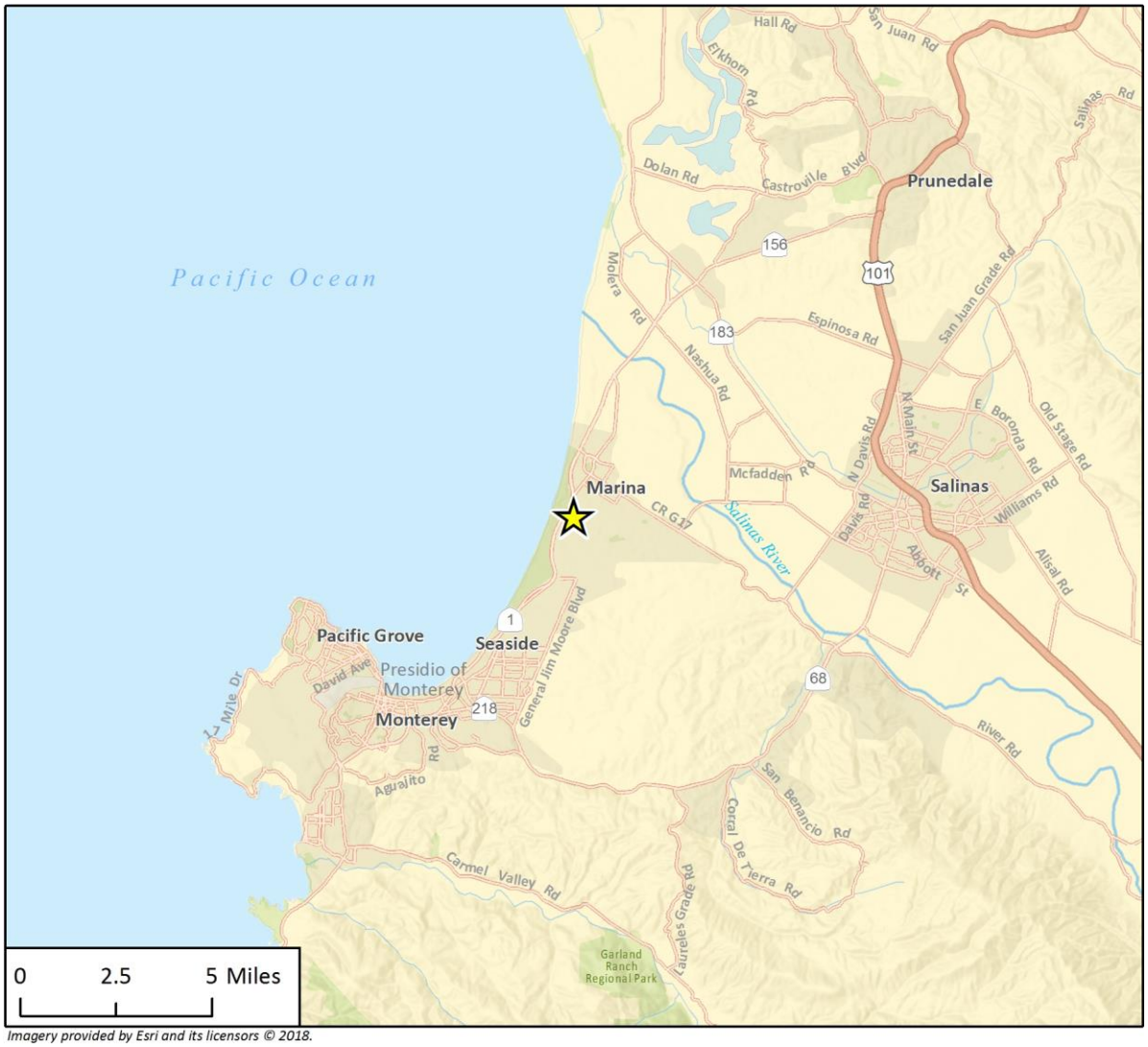
6. General Plan Designation

Single Family Residential (average density 5 dwelling units/acre)

7. Zoning

R-4 Multi-Family Residential

Figure 1 Regional Location



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Project Location

N

Fig 1 Regional Location

Figure 2 Project Site Location

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8. Description of Project

Existing Conditions

The project site is located at 229-239 Hayes Circle (Assessor's Parcel Number 031-021-040), within the former U.S. Army Fort Ord, in the central-southern portion of the City of Marina (refer to Figure 2). The 2.4-acre project site is currently developed with four vacant duplex structures. The structures were built in the mid-20th century and were previously used as army barracks. The project site is adjacent to vacant duplexes that are part of the planned Cypress Knolls development, a senior residential community. As described below, under Surrounding Land Use and Setting, the surrounding area is currently developed with old army barracks that are no longer in use and a mixture of duplexes and multi-family residences, all of which are one-story construction. The majority of the surrounding structures are abandoned and fenced off.

Topography of the site is varied: the southwest portion of the site is relatively flat, while the central and northern portions of the site contain moderate slopes. There is a slope of approximately 20 percent through the central portion of the site, rising approximately six feet, and there is a slope of approximately 60 percent through the northern portion of the site, rising approximately 12 feet. The overall site has a general slope downward from south to north, with the highest elevation (93') at the southern edge of the site and the lowest elevation (71') at the northern edge of the site. On-site vegetation is relatively sparse, with scattered live oaks, Monterey cypress, blackwood, and acacia trees. The majority of the trees on-site are in moderate to poor conditions. A public trail runs along the southern edge of the site, at the rear of the property.

Project Description

Purpose

The proposed project is a three story, 71-unit apartment structure intended to provide supportive housing for veterans, with a priority for homeless veterans. The facility would allow veterans to reside at the service-based property in perpetuity, as opposed to transitional housing which limits the tenure of tenants. The project is defined within the Marina Municipal Code (Section 17.04.698) as supportive housing, which is permitted in all residential zones.

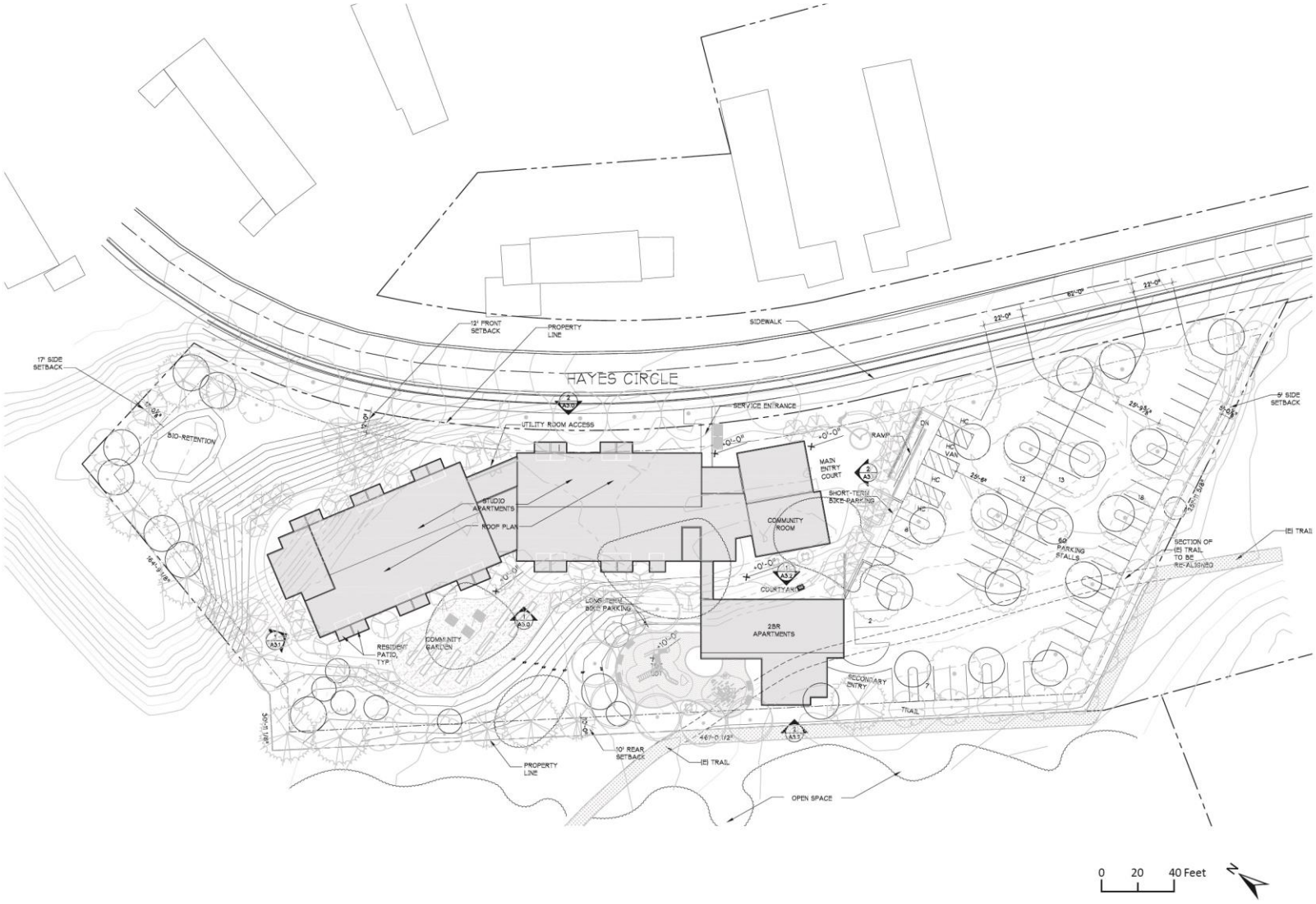
Proposed Project

The proposed project would include demolition of the existing four on-site vacant duplex structures and construction of a 54,480 square foot, three-story, 71-unit apartment complex organized into a main building and a family wing, connected via a covered walkway. Located on 2.4 acres, the project would have a residential density of 30 units per acre. Each of the proposed facilities is described below. The proposed site plan is depicted in Figure 3.

MAIN BUILDING

The main building would be situated at the front of the property along Hayes Circle and would include 64 studio apartments and seven two-bedroom apartments. Seventy units would be rented and one would be reserved for the on-site manager. The main building would also include the following related facilities:

Figure 3 Project Site Plan



Source: HKIT Architects, 2016

- Ground floor
  - Entry area
  - Common room
  - Manager's office
  - Computer room
  - Utility room
- Second floor
  - Pet wash
  - Laundry facilities
  - Services office
- Third floor
  - Meditation room
  - Fitness room

FAMILY WING

The family wing would be situated at the rear of the project site, behind the main building and adjacent to the parking lot. The family wing would have seven two-bedroom apartments and would include covered bike storage on the ground floor. Each unit would be 950 square feet and have a private entry off of an interior hallway and a private outdoor patio.

The family wing would be connected to the main building via covered walkways (one on each level) and have a separate entry off of the parking lot.

GROUNDS

Outdoor features of the proposed project would include a community garden, community courtyard, and a children's playground. The community garden, with raised wooden planter boxes, storage shed, and work tables, would be located at the rear of the property. The ADA accessible community garden would feature stabilized decomposed granite paving and would be accessed via a concrete pathway. The community courtyard, with an outdoor grill, seat wall, and dining tables, would be located between the main building and family wing. The playground, with play structures for ages 2-5 and 5-12, would be located at the rear of the property, adjacent to the family wing and separated from the community garden by a retaining wall and vegetation screen. A six-foot high wooden fence would enclose the community gardens and playground.

PARKING AND ACCESS

Parking would be provided in the southeast portion of the property, accessed via two entrances off of Hayes Circle. Sixty parking spaces would be provided, fifty of which would be covered, carport spaces with solar photovoltaic cells utilized as the cover. Ten spaces would be uncovered, four of which would be handicap accessible. The existing informal, public trail at the southwestern edge of the property would be realigned off property. Additionally, bike parking for eight bikes would be provided in the entry plaza and space for eighteen bikes would be provided in the covered bike parking area on the ground floor of the family wing. Fire Department access would be through a fire truck turn-out.

Access to the main building would be provided through an entry courtyard featuring decorative concrete paving, a flagpole, and shore walls designed for comfortable seating (seat walls). Sidewalks would connect the courtyard to the street and parking lot. The family wing would be accessed via the covered walkways connecting the wing to the main building, or through a separate entry off of the parking lot.

LANDSCAPING

Vegetation would be utilized as a windbreak along the property lines. Trees and shrubs would be used to separate the project from the public trail at the rear of the property and from Hayes Circle. Trees would also be used to screen the playground from the community garden and to provide shade. A bio retention basin would be located at the northern part of the property to treat stormwater and runoff. The bioretention basin would feature no-mow fescue and layered massing of water conserving shrubs, grasses, and groundcovers. Shade trees would be used on the north facing sides of the project and in covered spaces. The landscaping plan would utilize a variety of plants to create layers of texture and color and complement the building's architecture. Irrigation for the landscaping would be a fully automatic, low gallon use drip system, designed to connect to the city's recycled water supply, when available.

WATER SERVICE

Water service would be provided to the proposed project through the transfer of 15 acre feet per year (AFY) of potable water from the Fort Ord Reuse Authority (FORA) to the City of Marina for use at the Veterans Transition Center project (Appendix I, Exhibit A). As detailed in Appendix I, the Government of the United States of America transferred the right to use up to 15 AFY of unutilized Government Water Rights to FORA for the purposes of FORA making such 15 AFY available to the City of Marina for use at the Veterans Transition Center project. The Monterey County Water Resources Agency (MCWRA) confirmed the transferability of those 15 AF of water and consented to the permanent transfer of those water rights as described above. Water for the proposed project would be supplied by the Marina Coast Water District (MCWD), which supplies water through an interconnected water supply system to the Central Marina service area and the Ord Community service area (MCWD 2016).

SEWER SERVICE

Sewer service to the project site would be provided by the Marina Coast Water District (MCWD). A sanitary sewer manhole and pipe would be constructed along Hayes Circle, at the north end of the site, per MCWD standards. The existing sanitary sewer manhole and pipe would be demolished.

9. Surrounding Land Uses and Setting

The project site is located at 229-239 Hayes Circle on the former Fort Ord. Land immediately west of the site is vacant open space; land to the north, east, and south is comprised of single-story duplex structures constructed in the mid-20th century as army barracks (refer to Figure 2). Most of these existing structures are vacant and fenced off. For the purpose of analysis, it is assumed that any of the nearby structures may be occupied at the time of construction. The developed areas to the north, east, and south are part of the planned Cypress Knolls senior development, which has been entitled but not yet constructed. The project site immediately abuts, but is outside of, the Cypress Knolls project area.

Marina High School is located approximately 0.3 mile northeast of the site and the Monterey Peninsula College (MPC) Education Center is located approximately 0.2 mile southeast of the site. State Route (SR) 1 is approximately 0.2 mile west of the project site, with Marina State Beach immediately on the other side of the highway.

Existing land uses, General Plan designations, and zoning designations for the project site and immediately surrounding properties are provided in Table 1 below.

Table 1 Surrounding Land Uses and Setting

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Four vacant single-story duplex structures	Single Family Residential	Multi-Family Residential
North	Single-story duplex structures, mostly vacant	Single Family Residential	Single Family Residential
South	Single-story duplex structures, mostly vacant	Habitat Reserve and Other Open Space	Specific Plan-University Village
East	Single-story duplex structures, mostly vacant	Single Family Residential	Multi-Family Residential
West	Open space	Habitat Reserve and Other Open Space	Habitat Reserve and Other Open Space

10. Required Entitlements

The proposed project would require City approval of the following entitlements prior to commencement of grading or construction:

- General Plan Land Use Map amendment to change the designation from Single Family Residential to Multiple Family Residential.
- Conditional Use Permit in order to exceed 25 units per acre in the R-4 Zoning District.
- Tree Removal Permit for the removal of nine (9) trees on the project site, including one (1) Blackwood Acacia, two (2) Coast Live Oaks, three (3) Monterey Cypress, one (1) Bushy Yate, and two (2) Myoporum.
- Site and Architectural Design Review.

In addition, the following approval would be required from other public agencies:

- Fort Ord Reuse Authority (FORA) Base Reuse Plan consistency determination.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

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

Determination

Based on 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 to 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 potential 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
Printed Name	Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	■	☐
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	■	☐	☐

a. Would the project have a substantial adverse effect on a scenic vista?

The City of Marina General Plan (2010) Policy 4.126 states that both ocean and inland hill views from SR 1 shall be maintained to the greatest possible extent. The proposed project would not disrupt either of these views from SR 1. The project site is located inland of SR 1 and therefore would not block views of the ocean from this highway. In addition, as described further in Item I(b) below, the project would not be visible from SR 1 due to intervening topography and vegetation. Therefore, the project would not block or otherwise degrade views of inland hills from Highway 1. Other public roadways in the area include Third Avenue, Imjin Parkway, and Patton Parkway, none of which provide a view of the ocean. Additionally, the project site is separated from these roadways by existing development, open space, and vegetation. The development surrounding the project site is primarily abandoned duplex structures and is not considered to be a scenic resource per the General Plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The proposed project is not located along an officially designated State Scenic Highway. SR 1 is designated as an officially designated scenic highway north of the San Luis Obispo County line to its

junction with SR 68, approximately nine miles south of the project site. North of SR 68, SR 1 is designated as an eligible State Scenic Highway; however, it has not been officially designated in this location. The project site is located approximately 0.2 mile west of SR 1 and views of the site are blocked by intervening topography and vegetation. The project site and existing on-site development are not visible from SR 1. The proposed project would demolish existing on-site structures and construct a new, three-story apartment building. The new building would be 42 feet tall at the highest point– or approximately 27 feet taller than existing on-site structures. Despite this increased height, the intervening topography and vegetation would continue to block views of the site from SR 1. In addition, the project is not proximate to an officially designated State Scenic Highway. Therefore, the project would not substantially damage scenic resources within a State Scenic Highway. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

The area surrounding the project site contains open space and vacant duplexes, some of which have fallen into disrepair. Much of the surrounding area is planned for redevelopment as a senior housing community. The proposed project would demolish the four duplex structures on the project site and construct a three-story apartment complex. This residential use is consistent with the residential character of the surrounding area and the planned use of senior housing. While the project would increase the intensity of development at the project site, it would not degrade the existing visual character or quality of the site and its surroundings.

Architecturally, the project would include clean lines, accent colors, large windows, and landscaped outdoor space. The City of Marina General Plan (2010) states that landscape screening and restoration should be utilized with development. The proposed project would incorporate landscape screening along the project frontage at Hayes Circle, as well as in the rear of the property and around the parking lot. Landscaping would include a variety of plants of different colors and textures to compliment the architecture. Additionally, the project would be required to undergo review and be approved by the City's Site and Architectural Review Board.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Existing lighting on the project site includes exterior lighting associated with the four existing duplexes and street lights along Hayes Circle. The proposed project would increase the amount of night lighting on the site through the addition of light fixtures in the parking lot, building entrances, and outdoor patios. The City of Marina General Plan (2010) Policy 4.122 requires that all lighting on streets, public areas, and private development adjacent to habitat reserve areas and other areas of natural open space be shielded and as unobtrusive as possible. The policy requires that light be directed away from the open land. The project site is adjacent to open land that is zoned habitat reserve and other open space. In addition to the open space, lighting could cause a significant impact on nearby residences. To reduce this impact to a less than significant level, mitigation measure AES-1 is required.

The cars generated by the project would create additional lights from the use of headlights, as well as daytime glare. However, the project would not generate a substantial amount of new trips, see

Section 16, Transportation/Traffic, and only a portion of these would occur at night when headlights are in use.

The majority of the parking spaces would be covered with solar photovoltaic cells. Solar panels are designed to absorb, rather than reflect, sunlight. This minimizes the amount of glare produced. In combination with the vegetative screening, the panels would not create a new significant source of glare.

POTENTIALLY SIGNIFICANT IMPACT

AES-1 Lighting Specifications

Any exterior lighting installed on the project site shall be of low intensity, low glare design, and shall be hooded to direct light downward onto the subject parcel and prevent spillover onto adjacent residential parcels and open space. The lights shall be certified as Dark Sky Friendly by the International Dark-Sky Association.

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on 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 (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))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
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?	☐	☐	☐	■

a. Would the project convert Prime Farmland, Unique Farmland, 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?

e. Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

The project site is zoned Multi-Family Residential (R-4) and contains existing, vacant duplex structures. Neither the site nor surrounding area is designated or used for agricultural production. The project site is designated as Urban and Built Up Land on the Monterey County Important Farmland map and is not designated, or adjacent to, land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation, 2015). As

the project site is not located on or adjacent to any farmland, the proposed project would not result in the conversion of Farmland to non-agricultural use

NO IMPACT

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site is zoned Multi-Family Residential (R-4) and is not under a Williamson Act contract (California Department of Conservation 2016).

NO IMPACT

c. Would the project 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))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The project site is located in a residential, urban area. The project site is zoned Multi-Family Residential (R-4) and there is no forest land on or adjacent to the site. Nine trees on the site would be removed, including one (1) blackwood acacia, two (2) Coast live oaks, three (3) Monterey cypress, one (1) bushy yate, and two (2) myoporum. While the Monterey cypress and coast live oak are native trees to California, the individual trees on the project site are not considered to be part of naturally occurring woodlands (see Section 4, Biological Resources). Pursuant to Section 12220(g) of the California Public Resources Code, “forest land” is defined as supporting 10 percent native tree cover of any species under natural conditions. As the project site, nor the adjacent area, is covered by 10 percent of naturally occurring tree species, no forest land or timberland would be displaced or converted to non-forest use. There would be no impact.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	■	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	■	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	■	☐

The project site is located in the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). As the local air quality management agency, MBARD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether or not the standards are met or exceeded, NCCAB is classified as being in “attainment” or “nonattainment.” MBARD adopted the Air Quality Management Plan (AQMP) for the Monterey Bay Region in 2008 and updated it in 2017. The plan updated the 2012 AQMP with a revised air quality trends analysis that reflects revisions to the one- and eight-hour standards, as well as an updated emission inventory, which includes the latest information on stationary, area and mobile emission sources.

A significant adverse air quality impact may occur when a project individually or cumulatively interferes with progress toward the attainment of the ozone standard by generating emissions that equal or exceed the established long term quantitative thresholds for pollutants, or exceed a state or federal ambient air quality standard for any criteria pollutant. Table 2 shows the significance thresholds that have been recommended by MBARD for projects within the NCCAB.

Table 2 MBARD Maximum Daily Emissions

Pollutant	Construction Threshold (lbs/day)	Operation Threshold (lbs/day)
VOC	137	137
NO_X	137	137
CO	550	550
SO_X	150	150
PM_{10}	82	82
$PM_{2.5}$	N/A	N/A

Source: MBARD 2008(b)

Both construction and operational emissions associated with on-site development were calculated using the California Emissions Estimator Model (CalEEMod) Version 2013.2.2 (2013) software. The construction activities associated with development would generate diesel emissions and dust. Construction equipment that would generate criteria air pollutants includes excavators, graders, haul trucks, and loaders. It is assumed that all of the construction equipment used would be diesel powered.

Operational emissions would be comprised of mobile source emission, energy emissions, and area source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the project site associated with the operation of on-site development. Emissions attributed to energy use include electricity and natural gas consumption for space and water heating. Area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coatings. The CalEEMod output is included as Appendix A.

To determine whether a significant regional air quality impact would occur, the emissions generated by the proposed project were compared to the MBARD's recommended regional thresholds for both construction and operational emissions. A significant adverse air quality impact may occur when a project individually or cumulatively interferes with progress toward the attainment of the ozone standard by releasing emissions that equal or exceed the established long term quantitative thresholds for pollutants, or exceed a state or federal ambient air quality standard for any criterial pollutant.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Vehicle use, energy consumption, and associated air pollutant emissions are directly related to population growth. A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the 2012-20115 AQMP. The current (2018) population of Maria is 22,424 and the average household size is 2.91 persons per household (DOF 2018). The project would add 71 residential units (71 units x 2.92 persons/unit), which would increase the City population by approximately 208 persons. The draft Association of Bay Area Governments population forecast for the City of Marina in 2020 is 23,470 persons (AMBAG 2018). An increase in 208 persons would increase the population to 22,632 persons, which is within the 2020 population growth forecast for Maria. The project would be consistent with regional growth forecasts. Therefore, the project would not result in emission that would conflict with those anticipated in the AQMP.

LESS THAN SIGNIFICANT IMPACT

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

The proposed project would generate temporary air pollutant emissions during construction and long-term emissions associated with the operation of the project. Both construction and operational emissions associated with the project are discussed below.

Construction Emission

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10}) and exhaust emissions from heavy construction vehicles, in addition to volatile organic compounds (VOCs) that would be released during the drying phase upon application of architectural coatings. Grading, excavation, hauling, and site preparation would involve the largest use of heavy equipment and generation of fugitive dust. For the purposes of the model, it was assumed that all construction would be in compliance with MBARD Rules and that construction would be completed within the developer's estimated fourteen month timeframe. Table 3 summarizes the estimated maximum daily emissions of pollutants as a result of project construction.

Table 3 Estimated Construction Emissions

	Estimated Maximum Daily Emissions (lbs/day)				
	VOC	**NO_X**	**CO**	**SO_2**	**PM_{10}**
Overall Construction Maximum Daily Emissions	14.7	24.7	21.5	<0.1	7.8
MBARD Threshold	137	137	550	150	82
Threshold Exceeded?	No	No	No	No	No

See Appendix A for CalEEMod output

As shown in the table, daily emissions from demolition and construction activities would not exceed MBARD construction thresholds for any pollutants.

Operational Emissions

Long-term emissions associated with project operation, as shown in Table 4, would include emissions from vehicle trips (mobile sources), natural gas and electricity (energy sources), and landscape maintenance equipment, consumer products, and architectural coating associated with on-site development (area sources).

Table 4 Estimated Operational Emissions

	Estimated Emissions (lbs/day)				
Source	**VOC**	**NO_X**	**CO**	**SO_X**	**PM_{10}**
Area	2.3	0.7	5.9	<0.1	<0.1
Energy	<0.1	0.2	0.1	<0.1	<0.1
Mobile	2.0	5.0	24.1	<0.1	3.2
Total Emissions	4.3	5.3	30.1	0.1	3.2
MBARD Threshold	137	137	550	150	82
Threshold Exceeded?	No	No	No	No	No

See Appendix A for CalEEMod output. Numbers may not add up due to rounding.

As shown in the table, emissions from the operation of the proposed project would not exceed MBARD thresholds for any criterial pollutant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project create objectionable odors affecting a substantial number of people?

The project would involve the construction of a 71-unit residential apartment complex on a site that is currently developed with residential uses. Substantial odors are normally associated with uses such as agriculture, wastewater treatment, industrial facilities, or landfills. The project would not include uses that normally result in odor emission, and would not expose future project residents to substantial odors.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	■	☐
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	■
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?	☐	■	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐
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?	☐	☐	■	☐

The impact analysis presented in this section is based on a review of pertinent information relating to biological resources within the project region, a reconnaissance site visit, a botanical survey, and a Biological Assessment as described below.

The project site is located within the boundaries of the Fort Ord Base Reuse Plan (BRP) and is zoned for redevelopment (Fort Ord Reuse Authority [FORA] 1993). The goal of the BRP is to identify areas of the former Fort Ord that can be transferred to local jurisdictions to promote local economic development and housing opportunities. The BRP defines a specific Habitat Management Plan to ensure protection of natural resources as defined by an agreement between the Army and the USFWS.

Rincon Consultants biologists reviewed relevant databases and literature for baseline information on biological resources occurring and potentially occurring at the project site and in the immediate surrounding area. The review included information available in peer-reviewed journals, standard reference materials, and relevant databases containing special status biological resource occurrences.

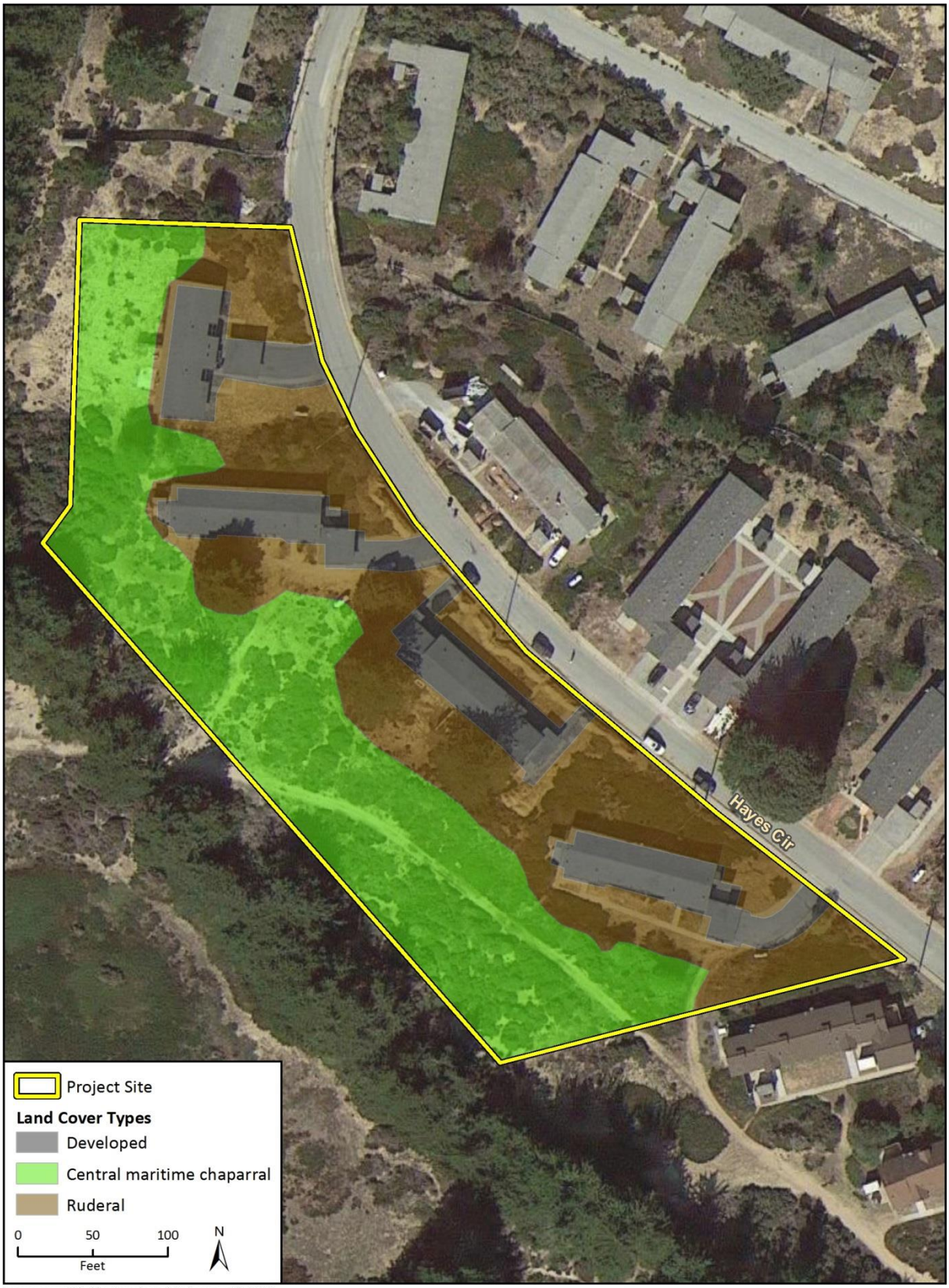
Specifically, Rincon Consultants biologists conducted a search and review of the CNDDB for recorded occurrences of special status plant taxa (species, varieties, and subspecies) and wildlife species prior to conducting a field survey. The CNDDB search area consisted of areas within a five-mile radius of the project site. The CNDDB is based on recorded occurrences of special status taxa and does not constitute an exhaustive inventory of biological resources for any given area (CDFW 2018). Other data included database search results from the CNPS Online Inventory of Rare and Endangered Plants of California (CNPS 2018).

On April 4, 2016, a Rincon Consultants biologist conducted a reconnaissance survey of the project site to document site conditions and evaluate the potential for sensitive biological resources to occur. Additionally, focused botanical surveys were conducted onsite and a Biological Assessment (BA) was prepared for the project (Rincon 2016a; 2016b). For details regarding methodology please refer to the Rare Plant Survey Report and BA (Appendix B).

Existing Conditions

The project site consists of four residential duplex structures surrounded by a matrix of native and non-native vegetation with previously disturbed and recolonized elements. Three land-cover types were identified on the site: central maritime chaparral; ruderal; and developed. These land-cover types are mapped in Figure 4. Developed areas are located where existing structures and driveways occur. Ruderal areas are present along the margins of the developed areas in-between the existing buildings and along Hayes Circle to the east of the site. Ruderal areas are either barren or dominated (nearly exclusively) by iceplant (*Carpobrotus edulis).* Highly disturbed central maritime chaparral is present along the western side of the project site. This habitat is dominated by black sage (*Salvia mellifera*), sand mat (*Cardionema ramosissimum*), chamise (*Adenostoma fasciculata*), sandmat manzanita (*Arctostaphylos pumila*), and ceanothus (*Ceanothus dentatus*), but also includes a lower abundance of other native plants such as coyote bush (*Baccharis pilularis*), deerweed (*Acmispon glaber*), California aster (*Corethrogyne filaginifolia*), California poppy (*Eschscholzia californica*), pygmy weed *(Crassula connata*), and rushrose (*Crocanthemum scoparium*). This habitat is highly disturbed by previous human activity and development, and as a result includes an abundance of non-native species. Coast live oak (*Quercus agrifolia*) and Monterey cypress (*Hesperocyparis macrocarpa*) are also present on the site. Although Monterey cypress and coast live oak are native to California, based on the known distribution of natural stands of Monterey cypress

Figure 4 Land Cover Types Within the Project Site



Imagery provided by Google and its licensors © 2018.

and oak woodland in the region, the individuals on the project site are not considered to be part of naturally occurring woodlands.

No special status wildlife species were observed during the survey.

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

The project could result in impacts to special status plant and animal species as described below.

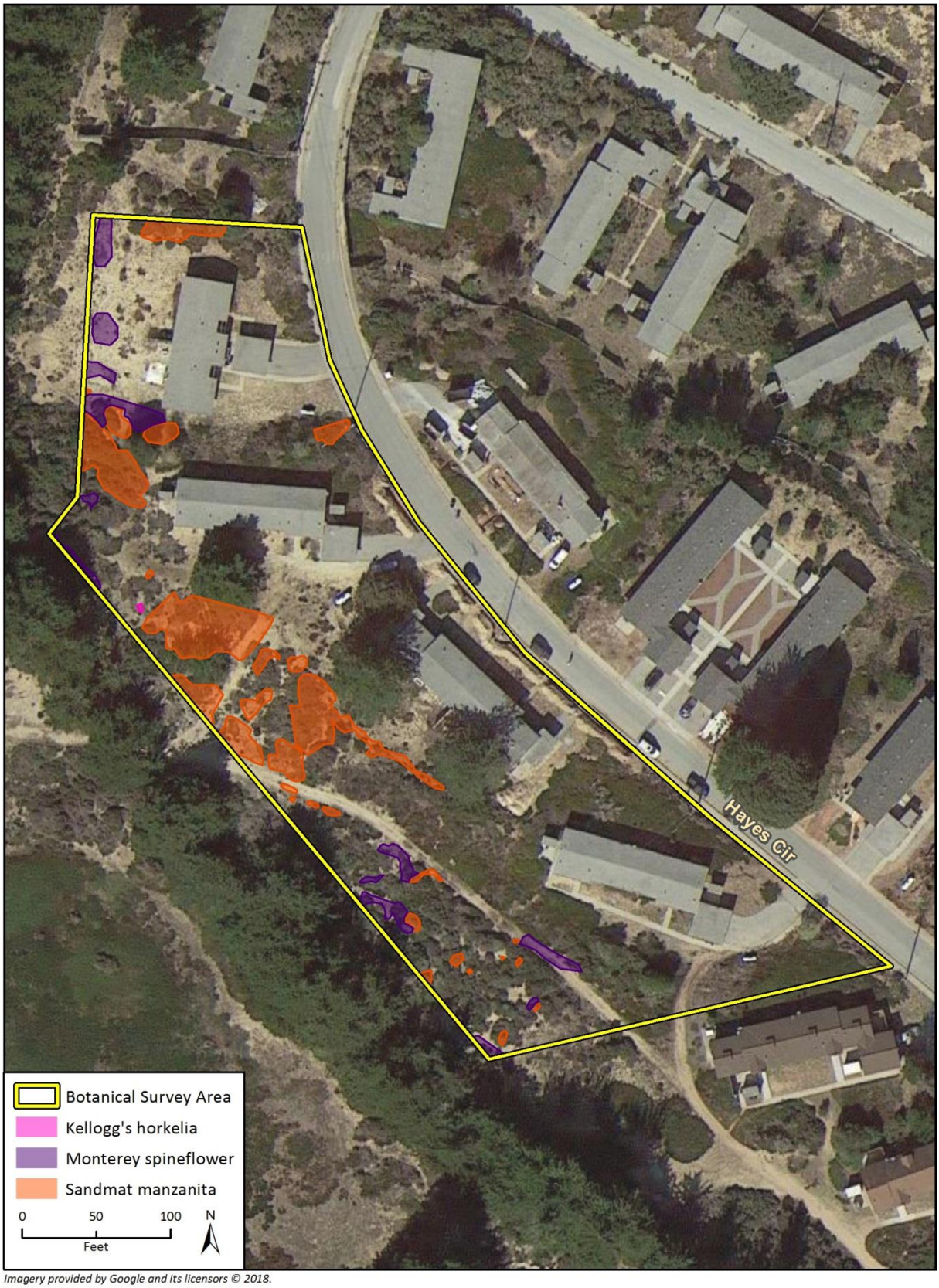
Special Status Plants

A review of the CNDDB results for known special status species occurrences within the *Marina, California* 7.5 -minute U.S. Geological Survey (USGS) quadrangle identified a total of 19 special status plant species that occur regionally. Five special status plant species were identified with the potential to occur on the project site based on suitable habitat: Monterey spineflower (*Chorizanthe pungens* var. *pungens)*, Monterey gilia (*Gilia tenuiflora* ssp. *arenaria*); Kellogg's horkelia (*Horkelia cuneata* var. *sericea*), sandmat manzanita, and Eastwood's goldenbush *(Ericameria fasciculata).* Therefore, a focused botanical survey was conducted within the bloom period of the species with potential to occur on the project site. Of those species, Monterey spineflower, Kellogg's horkelia, and sandmat manzanita were detected within the project site (Figure 5). No other special status species were encountered during surveys. In addition, an ornamentally planted Monterey cypress tree and California Rare Plant Rank (CRPR) 4 species Monterey ceanothus (*Ceanothus rigidus*) and virgate eriastrum (*Eriastrum virgatum*) were detected within the project site. Ornamentally planted and CRPR 4 species are not typically awarded protection under CEQA except where population-level effects would occur. Because such impacts to CRPR 4 species would not result from this project due to the low number of individuals affected by the project and comparatively large number of individuals present in the vicinity, including populations on reserves and protected lands, CRPR 4 species are not discussed further in this analysis. CRPR 1 and 2 species and listed species are typically considered special status under CEQA and are analyzed further; however, guidelines for the conservation and management of species and habitats on former Fort Ord lands identify actions specific to federally listed species which are discussed in greater detail below under *Project Impacts on Special Status Plants*. The results of special status plant species for those species observed on the site are described below.

Monterey Spineflower

Monterey spineflower is federally threatened species with a CRPR 1B.2 rank. This species is an annual herb that prefers sandy habitats including maritime chaparral, cismontane woodland, coastal dunes, coastal scrub and valley/foothill grassland. CNDDB data identifies several populations near the project site. Approximately 1,200 individuals were detected within the project site during appropriately timed botanical surveys (Rincon 2016a). Note that annual species such as Monterey spineflower that occur in dynamic maritime communities may show substantial fluctuations in the distribution and numbers of individuals that germinate from year to year, therefore, the number of individuals and acreage that would be impacted by the project could change slightly from year to year. In spring of 2016, Monterey spineflower exhibited notably abundant germination and bloom based on discussion with USFWS (pers. comm. 2016), thus, the extent and numbers mapped in the 2016 survey likely approximate the outer bounds of extent and abundance for this site.

Figure 5 Special Status Species Within the Project Site



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Kellogg's Horkelia

Kellogg's horkelia is a non-listed perennial herb with a CRPR 1B.1 rank. This species is associated with unvegetated sandy or gravelly soils in closed-cone coniferous forest, maritime chaparral, coastal dunes and coastal scrub. Two individuals of Kellogg's horkelia were detected within the project site. Kellogg's horkelia is also reported from several locations regionally, including populations within former Fort Ord on parcels slated as open space and reserves, one of which occurs on the City-owned parcel that borders the project site. A portion of this city parcel is designated to be a reserve under the Installation-Wide Multispecies Habitat Management Plan for Former Fort Ord (United States Army Corps of Engineers [USACE]1997), hereinafter referred to as the Habitat Management Plan (HMP)

Sandmat Manzanita

Sandmat manzanita is a perennial evergreen shrub with a CRPR 1B.2 rank. This species is associated with unvegetated sandy soils in closed-cone coniferous forest, maritime chaparral, cismontane woodland, coastal dunes and coastal scrub. Approximately 300 individuals were observed during the focused botanical surveys, occupying approximately 0.2 acre.

Project Impacts on Special Status Plants

Sandmat manzanita and Kellogg's horkelia are present within the project site and are CRPR 1B species and therefore afforded protection under CEQA. However, the species are not listed under the federal or state Endangered Species Acts, and the loss of a few individuals of each species due to implementation of the project is not likely to result in the substantial decline of local or regional populations for these species.

The HMP established guidelines for the conservation and management of species and habitats on former Fort Ord lands by identifying lands that are available for development, lands that have some restrictions with development, and habitat reserve areas. The project site is parcel L9.1.2 in the HMP, and is identified as a "Development" parcel that has been transferred out of federal management and for which there are no management restrictions (USACE 1997). Biological resources found on lands designated as "Development" are not considered by the HMP to be essential to the long term preservation of sensitive species at Former Fort Ord. Therefore, impacts to sandmat manzanita and Kellogg's horkelia would be less than significant. For a discussion of this analysis please see the Rare Plant Survey Report (Rincon 2016a, Appendix B).

Impacts to Monterey spineflower resulting from construction of the project would be potentially significant due to its rarity and federal status. Based on the 2016 Rare Plant Survey Report, the project would potentially impact approximately 1,200 individuals occupying approximately 0.06 acre. Monterey spineflower is listed by the federal government as threatened, and consultation with USFWS was completed in 2017 to address project effects on this species. Impacts to any individuals of these species would be considered significant under CEQA. Implementation of measures B-1, B-2, and B-3 would reduce potential impacts to these plant species to less than significant.

The findings of rare plant surveys are typically considered accurate for five years following the survey. If the project is delayed, a subsequent rare plant survey may be required.

Special Status Animals

A review of the CNDDB results for known special status species occurrences within the *Marina, California* 7.5- minute USGS quadrangle identified 17 special status animals. One special status animal species was identified with the potential to occur on the project site based on suitable habitat: black legless lizard (*Anniella pulchra* subsp. *nigra*). Black legless lizard is a California Species of Special Concern. This reptile species is found on sand dunes and sandy soils in the Monterey Bay and Morro Bay regions. It inhabits moist sandy soils characterized by bush lupine and mock heather. CNDDB data identifies numerous populations within less than one mile of the project site. Although reconnaissance surveys did not identify this species on-site, focused surveys were not conducted, and due to the presence of low quality habitat and the proximity of documented populations, it is possible that this species could occur.

Project Impacts on Special Status Animals

Construction activity could directly impact this species and population-level effects from project impacts would be potentially significant under CEQA. However, based on the known distribution of this species and the extent of suitable habitat in the immediate vicinity (i.e., throughout the former Fort Ord) project-related impacts to this species are unlikely to have a population-level effect.

The project site contains suitable nesting habitat for a variety of birds that are protected under the California Fish and Game Code (CFGC) and the Migratory Bird Treaty Act (MBTA). The project would impact potential nesting habitat by the removal of vegetation including several trees; and through general construction activity that has the potential to directly and indirectly impact nesting birds. Direct impacts could include the destruction of active bird nests. Indirect impacts include the abandonment of active nests by adult birds that are disturbed by nearby construction activity and associated noise. In order to avoid potential take of nesting birds, implementation of mitigation measure B-5 is required.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

The following mitigation measures are required.

B-1 Worker Environmental Awareness Training

Prior to the start of any construction activities, all construction personnel shall attend a worker environmental awareness training from a qualified biologist. The training shall include the identification of all special status plant and animal species with potential to occur on the project site, a description of their habitats, their regulatory statuses, and all measures being implemented to avoid and minimize impacts.

B-2 Special Status Plant Avoidance

All special status plants that can be avoided shall be demarcated with highly visible orange construction fencing installed with a 30-foot buffer from construction activities. The fencing shall be inspected on a weekly basis during construction to ensure it is in good condition. If Monterey spineflower cannot be avoided, then mitigation measure B-3 shall be implemented.

B-3 Monterey Spineflower Mitigation

Impacts to Monterey spineflower shall be mitigated as follows.

- **Weed Management and Monitoring Plan.** To avoid the introduction of spread of invasive plant species, a weed management and monitoring plan shall be prepared and implemented during the first two years following construction. The plan shall be submitted to the USFWS for review and include methods to prevent establishment of invasive plant that could spread to adjacent native habitat.
- **Silt Fencing.** Prior to construction activities, in areas where listed plants are adjacent to the proposed project construction footprint, slit fencing or similar barrier will be installed at the limits of work to prevent burial of plants.
- **Topsoil/Seed Salvage.** Initial ground disturbance shall be timed to allow for collection of seed and/or topsoil with seed bank after seed has set for that year, as determined by a qualified botanist. A qualified botanist shall salvage seed and/or topsoil from occupied areas prior to ground disturbance in that area. The seed and/or topsoil shall be stored dry in a climate controlled environment appropriate for the storage of seed. To the extent feasible, seed and/or topsoil shall be applied back to the project site after construction in undeveloped open areas. Any excess seed and/or topsoil shall be made available to nearby sites that are suitable for restoration efforts, such as State Parks properties, the University of California Reserve, California State University Monterey Bay lands, or Bureau of Land Management lands. If suitable receivers are unwilling to participate in restoration efforts, the applicant shall fund permanent storage of the seed and/or topsoil at a qualified seed bank with appropriate credentials to store native plant seed for long-term conservation.

B-4 Black Legless Lizard Preconstruction Surveys

Preconstruction surveys for black legless lizard shall be conducted in areas of suitable habitat (central maritime chaparral and ruderal areas) within the project site. Surveys shall include visual inspections and raking/sifting as necessary to locate individuals prior to ground disturbance activities, and shall be conducted by a qualified biologist. The contractor and/or qualified biologist shall receive approval from the City, in consultation with CDFW as needed, to identify a relocation site that is nearby with habitat suitable for the species. If individuals are identified during surveys, the qualified biologist shall:

- Store all individuals in an appropriate container (insulated with lid);
- Transfer individuals within four hours of capture;
- Release in appropriate/comparable habitat (in coordination with the City, who may choose to consult with CDFW regarding release sites);
- Document translocation effort through photos, GPS salvage and relocation sites, and standard measurements (temperature, time); and
- Provide the City with a final report of translocation efforts once completed.

B-5 Nesting Bird Surveys and Avoidance

Initial site disturbance shall be prohibited during the general avian nesting season (February 1 – August 30), if feasible. If nesting season avoidance is not feasible, a qualified biologist shall conduct a preconstruction nesting bird survey to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. The extent of the survey buffer area surrounding the site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided. To avoid the destruction of active nests and to protect the reproductive success of birds protected by MBTA and CFGC, nesting bird surveys shall be performed not more

than 14 days prior to the scheduled vegetation clearance. In the event that active nests are discovered, a suitable buffer shall be established around such active nests and no construction within the buffer allowed until a qualified biologist has determined that the nest is no longer active (e.g. the nestlings have fledged and are no longer reliant on the nest). No ground disturbing activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Nesting bird surveys are not required for construction activities occurring between August 30 and February 1.

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

There is no riparian habitat on the project site. One state/federally ranked natural community was identified on site: central maritime chaparral. The condition of this community would not be considered a high-quality representation (as defined by CDFW) due to the extensive presence of invasive species and modification of the landscape by human disturbance. CDFW indicates that if a project impacts a small area of previously disturbed natural community, this would not constitute a significant impact. The project site was historically part of Fort Ord and was developed with army barracks; the site was later zoned as Multi-Family Residential by the City of Marina. The project site is bordered on the west by a windrow of Monterey cypress, disconnecting it from larger continuous stands of adjacent central maritime chaparral. The vegetation stands on-site appear to be a product of regrowth or recolonization around the former base housing structures. In addition, the project would impact a small acreage of this previously disturbed natural community. Therefore, implementation of the project would result in less than significant impacts to central maritime chaparral. No other sensitive natural community is located on the project site.

LESS THAN SIGNIFICANT IMPACT

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

The site does not contain any federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or any Waters of the State that would fall under the jurisdiction of the CDFW or the Regional Water Quality Control Board.

NO IMPACT

d. Would the project 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?

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

Although the project site contains a matrix of ornamental and native vegetation, the property lacks contiguous habitat that would provide critical habitat elements necessary to function as a wildlife corridor, and already contains previous development. The site is bounded on the north, south, and east with existing residential development and is itself part of a previously developed portion of Fort Ord housing. To the west is coastal habitat that is relatively contiguous with other open areas and suitable wildlife habitat. The site is not part of, or directly within any known or documented wildlife access or historical migratory route. Because the site was previously developed with four duplex structures, the project would not significantly alter the existing conditions of the site and as such would not modify any wildlife corridors that may be present in coastal habitat to the west of the project site.

The structures onsite could potentially serve as maternity roosts (nursery sites) for native bat species and implementation of the project could result in impacts to bat maternity roosts, if present. However, with implementation of Mitigation Measure B-6 below, impacts to bat maternity roosts would be less than significant

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

The following mitigation measure is required:

B-6 Roosting Bats Impact Avoidance and Minimization

Prior to construction activities, a qualified biologist shall conduct a survey of existing structures and trees within the project site to determine if roosting bats are present. The survey shall be conducted during the non-breeding season (November through March). The biologist shall have access to all interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.) If the bats are not part of an active maternity colony, passive exclusion measures may be implemented in coordination with the City, who may choose to consult with CDFW regarding exclusion methodology. These exclusion measures may include one-way valves that allow bats to exit the structure but are designed so that the bats may not re-enter the structure.

Prior to demolition of any structure or removal of any trees, a survey shall be conducted by a qualified biologist to determine if any structures or trees proposed for removal harbor sensitive bat species or maternal bat colonies. If a non-maternal roost is found, the qualified biologist, in close coordination with the City, who may choose to consult with CDFW regarding methodology, shall install one-way valves or other appropriate passive relocation method. Maternal bat colonies may not be disturbed. Other measures to avoid impacts to bats may necessary as determined by the City in consultation with CDFW.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The project would result in the removal of 14 trees, as described in the Tree Evaluation and Construction Assessment Report (Tree Evaluation) prepared for the project (MacNair and Associates 2015; refer to Appendix B), including:

- Five Monterey cypress (planted ornamentally)
- Five coast live oak
- Two Myoporum
- One blackwood acacia
- One bush yate

One coast live oak is located outside the project site and would not be removed, but could be impacted by project activity. Of the 14 trees to be removed, four are of poor suitability for preservation, seven are of moderate suitability for preservation, and three are of good suitability for preservation (MacNair and Associates 2015). A detailed discussion of the locations and conditions of all trees proposed for removal are presented in MacNair and Associates (2015; refer to Appendix B)

Marina Municipal Code Chapter 17.51 (Tree Removal, Preservation and Protection) requires a tree removal permit for the removal of any tree within the city. Conditions imposed on the removal may include, but would not be limited to, one or more of the following:

1) Preparation of a tree removal and protection plan, including tree protection guidelines.
2) A compensation plan requiring the replacement or placement of additional trees on the property and/or the payment to the city to fund the purchase, planting, and maintenance of off-site replacement trees.
3) Preparation of a site restoration plan requiring restoration of ground surface area in the vicinity of tree removals.

The project applicant would be required to obtain a tree removal permit and comply with the applicable conditions imposed, as described above. Pursuant to issuance of the permit, the project would not conflict with the Marina Municipal Code Chapter 17.51.

LESS THAN SIGNIFICANT IMPACT

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

The project site is located within the boundaries of the Fort Ord BRP. A HMP was developed between the Army and the USFWS to protect open space and native habitats within the plan boundaries. The project site is identified as previously developed within the HMP and has been transferred to the City for redevelopment. The City has rezoned the project site to R-4 (redevelopment). The implementation of the project is consistent with the goals of the HMP as described in the Fort Ord Base Reuse Plan as an area of redevelopment.

A draft Installation-Wide Multispecies Habitat Conservation Plan has been prepared for Fort Ord and is awaiting adoption (ICF International 2012).

LESS THAN SIGNIFICANT IMPACT

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	■	☐
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	■	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	■	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	■	☐

The following section is based on the Historic & Cultural Resources Evaluation report prepared by AEM Consulting in November 2015, the Cultural Resources Study prepared by Rincon Consultants Inc. in February 2016, and a review of geologic maps and paleontological studies.

a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

CEQA PRC Section 21084.1 requires that all property fifty years or older must be reviewed for historical significance. The existing duplexes that would be removed as part of the project were constructed in the mid-20th century for base housing on the former Fort Ord. AEM Consulting performed a Historic & Cultural Resources Evaluation of the project site to evaluate the historical value of the site and existing buildings (the full report is included as Appendix C of this IS-MND). The evaluation found that none of the existing structures meet the criteria for inclusion in the National Register of Historic Places (NRHP), as none of the structures are associated with events that have made a significant contribution to the broad patterns of our history (Criteria A), are associated with the lives of persons significant in our past (Criteria B), embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction (Criteria C), or has yielded or may be likely to yield, information important in prehistory or history (Criteria D). As the existing duplex structures lack the potential for inclusion on the NRHP, demolition of these structures would not constitute a substantial adverse change in the significance of a historic resource, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?

d. Would the project disturb any human remains, including those interred outside of formal cemeteries?

The project site is currently developed with vacant residential duplex structures. As the site has been previously disturbed, the potential to uncover archaeological resources or human remains on the site is low. In February 2016, Rincon Consultants Inc. prepared a Cultural Resources Study for the project site, which is included as Appendix D to this IS-MND. The study included a background record search, Native American scoping, and an intensive pedestrian survey. The background record search was completed by the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS), as well as through reviews the NRHP, the California Register of Historical Resources (CRHR), the California State Historical Landmarks list, the California Points of Historical Interest list, historic buildings surveys, the Archaeological Determinations of Eligibility list, and the California Inventory of Historical Resources list. These searches provided information about any archaeological resources, historic resources, and reports with the area of potential effect (APE) and within a 0.5 mile radius of the APE (Rincon 2016; refer to Appendix D). The search identified one previously recorded cultural resources as potentially present within the APE, which prompted a pedestrian survey to identify if any portions of the resource are present within the APE. The pedestrian survey was completed using transects spaced no greater than 15 meters apart and oriented from east to west in unpaved areas and where vegetation was sparse enough to allow it (Rincon, 2016). The entire exposed ground surface was examined for artifacts, ecofacts, soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings or historic debris. During the survey, no portions of the previously recorded archaeological resource were identified, nor were any additional cultural resources identified.

Government Code §65352.3 requires that local governments consult with California Native American tribes for the purpose of protecting and/or mitigating impacts to cultural places. In order to comply with this, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed for the APE, or project site. The search did not reveal any specific site information or cultural resources within the APE. Because the NAHC and CHRIS searches are not exhaustive, 13 area Native American tribes were contacted regarding the project and to inquire if the tribes had any knowledge of cultural resources within the project vicinity. As of February 25, 2016, three responses were received. Valentin Lopez, Chairperson of the Amah Mutsun Tribal Band, stated that Marina is outside of their territory and they have no comment. Tony Cerda, Chairperson for the Coastanoan Rumsen Carmel Tribe, stated that the project is very important to his tribe and the tribe has veteran members who desire to be involved with the project. Irenne Zwierlein, Chairperson of the Amah Mutsun Tribal Band of Mission San Juan Bautista, stated that Fort Ord has been grazed and consequently she does not believe that any cultural resources would be identified, however requests the presence of a Native American cultural resources monitor at the APE if any Native American cultural resources are discovered during the project.

Although unlikely, there is always a potential for ground disturbing activities to uncover previously unidentified cultural resources. If archaeological resources are identified, as defined by Section 21083.2 of the Public Resources Code, the site would be required to be treated in accordance with the stated provisions as appropriate. If human remains are unearthed, State Health and Safety Code Section 7050.5requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section

5097.98. In case of an unanticipated discovery, compliance with these existing regulations would ensure that impacts remain less than significant. Mitigation Measure C-1 is required to increase worker awareness of cultural resources, so that existing regulations are followed in the event of an unanticipated discovery.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

The following mitigation measure is required.

C-1 Worker's Environmental Awareness Program

Prior to project construction, the project operator shall retain a qualified archaeologist meeting the Secretary of the Interior's Standards for historic archaeology to conduct a Worker's Environmental Awareness Program (WEAP) for all construction personnel working on the project. The training shall include an overview of potential cultural resources that could be encountered during ground disturbing activities to facilitate worker recognition, avoidance, and notification to a qualified archaeologist in the event of unanticipated discoveries.

c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

The project area is underlain by a single mapped geologic unit of Holocene-to-late Pleistocene age Quaternary older surficial deposits (Qos) (Dibblee 2007). These sediments comprise older stabilized dune and drift sand, which occur as a wide belt of sediment from the modern shorefront to the west to approximately the Salinas River to the east. Stabilized drift sand overly non-marine Pleistocene Aromas Sand (Dibblee 2007). Holocene-to-late Pleistocene aged eolian deposits would be considered to have low potential for containing scientifically significant paleontological resources under the paleontological sensitivity classification systems of both the Society of Vertebrate Paleontology (SVP 2010) and the Bureau of Land Management's (BLM) (BLM Potential Fossil Yield Classification [PFYC] system 2009) or by. These two sets of guidelines are the standards for assessing the paleontological potential of federally and non-federally managed lands in the United States.

A recent paleontological resources assessment of Monterey County (Rosenberg 2001) found that of the nearly 700 known paleontological localities within Monterey County, nearly all of them represent near-shore and deep-sea marine environments and none represent coastal dune or drift sand settings or occur near the project (Rosenberg 2001:35 and Sheet 4). Project-related ground disturbance would not be likely to disturb paleontological resources within Holocene or Pleistocene sediments, and therefore would not directly or indirectly destroy a unique paleontological resource or site.

LESS THAN SIGNIFICANT IMPACT

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6 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	☐	☐	■	☐
2. Strong seismic ground shaking?	☐	☐	■	☐
3. Seismic-related ground failure, including liquefaction?	☐	■	☐	☐
4. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	■	☐	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	■	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	■	☐

The following discussion regarding geology and soils at the project site is based on the Geotechnical Engineering Investigation Report (GEIR) performed at the project site by Moore Twining Associates, Inc. in November 2015. The GEIR is included as Appendix E to this IS-MND. As part of the investigation, five test borings were drilled, including three borings in the proposed building footprint to depths of about 16.5 and 51.5 feet below site grade (BSG) and two borings in the proposed parking area to a depth of about 5 to 11.5 feet BSG. The borings were used to conduct standard penetration tests, to obtain both disturbed and relatively undisturbed soil samples.

Results of the GEIR show loose to medium dense, poorly graded sands with silt overlying loose to dense poorly graded sands. Fill soils could not be differentiated from native soils in the samples, due the granular nature of the subsurface soils. No groundwater was encountered in any of the borings.

a.1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

The project site is not located in an Alquist-Priolo Earthquake Fault Zone. The GEIR identifies the "Blanco Section" of the Reliz Fault Zone as the closest active or potentially active fault to the site. This fault is located approximately 0.6 mile northeast of the project site. As there are no faults on the project site, there is no potential for surface rupture on the site.

LESS THAN SIGNIFICANT IMPACT

a.2. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project site is located in the City of Marina in Monterey County. Since 2007, Monterey County has experience 47 earthquakes. However, none have had a magnitude of greater than 4.4 or caused major damages, fatalities, or injuries (Monterey County 2014). Research by the USGS has shown that the San Andreas Fault has a 21 percent probability of a 6.7 magnitude, or greater, earthquake by the year 2032. The project site would be subject to seismic ground shaking during an earthquake of this magnitude on the San Andreas Fault, or any other active faults in the region. However, the project would be required to comply with applicable building codes, including Marina Municipal Code Chapters 15.10 and 15.14, which adopt the California Building Code and California Residential Code and would ensure that the residences are designed to withstand the expected seismic ground shaking. Compliance with these existing regulations would minimize substantial adverse effects associated with strong seismic ground shaking at the site.

LESS THAN SIGNIFICANT IMPACT

a.3. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

c. Would the project be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Seismic shaking can cause liquefaction and seismic settlement to occur during earthquake events. Liquefaction is a condition that occurs when unconsolidated, saturated soils change to a near-liquid state during groundshaking. Liquefaction generally causes lateral spreading of 10 to 15 feet, and can cause up to 100 feet of lateral spreading. This can cause considerable damage to property. The

project site has a groundwater depth of greater than 50 feet below site grade and is not considered to have a significant potential for liquefaction (Moore Twining Associates, Inc. 2015).

A seismic settlement analysis was performed as part of the GEIR. The results of this analysis indicate a total seismic settlement estimate of about one inch and a differential seismic settlement of ½ inch in 40 feet. The GEIR recommended that a structural engineer with slab-on-grade design experience recommend the thickness, design details, and concrete specifications to account for this potential settlement.

New foundations and structures, placement of fill, and withdrawal of groundwater can cause an increase in effective stress to underlying soils, causing vertical deformation of the soils and damage to the overlying structures. The GEIR evaluated the potential for excessive total and differential static settlement of foundations and slabs-on-grade. Based on the analysis of the assumed structural loads and the existing soil conditions encountered within the footprint of the proposed building, the GEIR recommended that on-site soils be excavated and compacted to support the foundations and slab on grade on a compacted subgrade condition. Additionally, the GEIR recommended that existing undocumented fill soils throughout the site be excavated and engineered fill placed below the new foundations in order to reduce the potential for settlement.

In order to ensure the proposed project is not adversely affected by seismic settlement or unstable soil, mitigation measure GEO-1 is required.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

GEO-1 Geotechnical Report

The project shall incorporate the recommendations made in the Geotechnical Engineering Investigation Report (Moore Twining Associates, Inc. 2015) including use of excavation of undocumented fill soils throughout the project site and placement of engineered fill soils throughout.

a.4. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project site has a general slope from south to north. The site does not contain any steep slopes and is not adjacent to any steep slopes that are at risk of a landslide. Therefore, the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

The potential for erosion generally increases after soil has been disturbed by clearing and grading, with loose soils creating conditions that lead to erosion. When vegetation is removed soil is subject to blowing and water erosion. Because the project would include grading and vegetation removal, temporary erosion could occur during project construction. However, the proposed project would disturb more than one acre during construction. As a result, the proposed project would be required to comply with the NPDES program for storm water discharges associated with construction activities, including through preparation of a SWPPP, which outlines Best Management Practices (BMPs) that would address post-construction runoff. BMPs that are typically specified within the SWPPP may include, but would not be limited to, the following:

- The use of sandbags, straw bales, and temporary de-silting basins during project grading and construction during the rainy season to prevent discharge of sediment-laden runoff into storm water facilities;
- Revegetation as soon as practicable after completion of grading to reduce sediment transport during storms;
- Installation of straw bales, wattles, or silt fencing around the perimeter of graded building pads if they are not built upon before the onset of the rainy season (October 15th through April 15th); and/or
- Structural BMPs (e.g., grease traps, debris screens, oil/water separators, etc.) incorporated into building design to minimize potential for contaminated stormwater to leave these areas.

Compliance with the required SWPPP would reduce potential impacts related to soil erosion or loss of topsoil to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

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

Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. When expansive soil is present, foundations must be designed to prevent uplift of the supported structure or to resist forces exerted on the foundation due to soil volume changes. Soil present at the project site has a low expansion potential (Moore Twining Associates, Inc. 2015).

LESS THAN SIGNIFICANT IMPACT

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The proposed project would be connected to an existing sewer system. No septic tanks or alternative wastewater disposal system would be used.

NO IMPACT

7 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with any applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases?	☐	☐	■	☐

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of greenhouse gases (GHGs), gases that trap heat in the atmosphere, analogous to the way in which a greenhouse retains heat. Common GHGs include water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases, and ozone. GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6) (Cal EPA 2015).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHGs, Earth's surface would be about 34° C cooler (Cal EPA 2015). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for transportation and electricity production, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

The vast majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

According to the *CEQA Guidelines*, projects can tier off of a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's

consistency with the GHG reduction policies included in a qualified GHG reduction plan.[1] Marina does not currently have a qualified GHG reduction plan. Therefore, this approach is not available for this project.

To evaluate whether a project may generate a quantity of GHG emissions that may have a significant impact on the environment, a number of operational bright-line significance thresholds have been developed by state agencies. Significance thresholds are numeric mass emissions thresholds which identify the level at which additional analysis of project GHG emissions is necessary. Projects that attain the significance target, with or without mitigation, would result in less than significant GHG emissions. Many significance thresholds have been developed to reflect a 90 percent capture rate tied to the 2020 reduction target established in AB 32. These targets have been identified by numerous lead agencies as appropriate significance screening tools for residential, commercial, industrial, and public land uses and facilities projects with horizon years before 2020.

The State, MBARD, Marina, and Monterey County have not adopted GHG emissions thresholds for land use projects. MBARD is evaluating a percentage-based threshold option (MBARD 2013); however, MBARD does not have a formal policy recommending specific thresholds.

Since MBARD has not adopted thresholds, MBARD encourages lead agencies to consider a variety of metrics for evaluating GHG emissions and related mitigation measures as they best apply to the specific project (MBARD 2017). MBARD has recommended using the adopted San Luis Obispo Air Pollution Control District (SLOAPCD) quantitative threshold for land use projects. SLOAPCD, the air district immediately south and adjacent to the MBARD, has adopted bright-line GHG significance thresholds of 1,150 MT CO_2e per year (SLOAPCD 2012).

The annual emissions threshold of 1,150 MT of CO_2e per year applies best to the project as Marina does not have a qualified GHG reduction plan and the project is not a high-density project whose impacts would be more appropriately quantified by a service population threshold to reflect the per-person emission efficiency. The AEP white paper, *Beyond Newhall and 2020*, recommends that for projects with a horizon of 2020 or earlier, a threshold based on meeting AB 32 targets should be used (AEP 2016). Therefore, projects with horizon years of 2020 or earlier, and emissions below the SLOAPCD threshold are not expected to require GHG mitigation for State mandates to be achieved. The project would be fully operational in 2020; therefore, its horizon year is 2020.

As discussed in Section 3, *Air Quality*, emissions associated with the project's construction period and long term operational emissions were estimated using CalEEMod. Complete CalEEMod results and assumptions are included as Appendix A to this IS-MND.

For mobile sources, CO_2 and CH_4 emissions were quantified in CalEEMod. Because CalEEMod does not calculate N_2O emissions from mobile sources, N_2O emissions were quantified using the California Climate Action Registry General Reporting Protocol (CCAR 2009) direct emissions factors for mobile combustion (see Appendix A). Estimates of vehicle trips associated with the proposed development are based on trip generation rates from the project Traffic Memorandum (see Appendix H), which developed trip generation rates based on the Institute of Transportation Engineers 8th Edition Trip Generation Manual. The estimate of total daily trips was calculated and extrapolated to derive total annual mileage in CalEEMod. Emission rates for N_2O emissions were

[1] This approach is considered by the Association of Environmental Professionals (AEP) in their white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (2016).

based on the vehicle mix output generated by CalEEMod and the emission factors found in the California Climate Action Registry General Reporting Protocol.

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

The project's proposed demolition and construction activities, energy use, daily operational activities, and mobile sources (traffic) would generate quantities of GHG emissions. CalEEMod was used to calculate emissions resulting from project construction and long-term operations. The project-related construction emissions are confined to a relatively short period of time in relation to the overall life of the proposed project. Therefore, the construction GHG emissions were amortized over a 30-year period to determine the annual construction related GHG emissions over the life of the project. As shown in Table 5 below, the combined annual GHG emissions associated with the project would be 547 metric tons CO_2e. This is less than the proposed SLOACPD threshold of 1,150 MT CO_2e per year.

Table 5 Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (metric tons CO2e)
Construction	371
Amortized over 30 years	12
Operational	
Area	1
Energy	121
Waste	15
Water	16
Mobile	
CO_2 and CH_4	363
N_2O	19
Total Operational	535
Total Emissions	547
See CalEEMod Results, Appendix A	

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The City of Marina does not have a qualified GHG reduction plan, and therefore projects are measured to other metric standards as discussed in this analysis. The project would fall below regional GHG thresholds adopted to ensure consistency with State emissions reduction regulations. Project features like installation of 18 bicycle racks and inclusion of a playground, fitness room, and mediation room would be expected to reduce vehicle trips associated with the project, thus reducing transportation emissions. Additionally, under State law the project would be required to comply with all energy standards of Title 24. The 2016 Title 24 standards are approximately 28 percent more efficient than the 2013 standards. The project would not conflict with any applicable plan, policy, or regulation for the purpose of reducing the emissions of GHGs and would be consistent with the objectives of the RTP/SCS, AB 32, SB 32, SB 97 and SB 375.

LESS THAN SIGNIFICANT IMPACT

8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
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?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☐	■
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	■	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	■	☐
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	■

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	■	☐

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project 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?

d. Would the project be located on a site included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Exposure to hazardous materials during the construction and operation of the proposed project could result from: (1) exposure of contaminated soil or groundwater during grading; (2) the improper handling or use of hazardous substances; (3) transportation accident; or (4) inadvertent release resulting from and unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type, amount, and characteristic of the hazardous material involved; the timing, location, and nature of the event; and the sensitivity of the individual or environment affected.

Neither the Department of Toxic Substance Control EnviroStor database (2018) nor the State Water Resources Control Board GeoTracker database (2018) list a cleanup site at the project site. The nearest cleanup site is the Central Coast High School Expansion Site, located 0.3 mile northeast of the project site. The Central Coast High School Expansion Site is under investigation for potential contamination with arsenic, explosives, and organochlorine pesticides. The proposed project would not be affected by the Central Coast High School Expansion Site, nor would the project disturb the potentially contaminated soil. No other cleanup sites are listed in the vicinity of the proposed project.

The project site is located on the former Fort Ord. Fort Ord has been listed on the EPA Superfund Program's National Priorities List since 1990, due to leaking petroleum underground storage tanks, a 150-acre landfill used for residential and commercial waste, a former fire drill area, motor pool maintenance areas, a small dumpsite, small arms target ranges, an 8,000 acre firing range, and other limited areas that pose threats from unexploded ordnance (EPA 2016). Cleanup of the area has been separated into three programs: the Army's Soil and Groundwater Contamination Program,

the Army's Munitions and Explosives of Concern (MEC) Program, and the Fort Ord Reuse Authority's Privatized Cleanup Program. The cleanup progress is ongoing and includes the operation of groundwater treatment systems at the former fire practice area, landfill, and the Site 2/12 Area. The landfill has been capped and landfill gas is being removed and treated. A pilot soil vapor extraction system for volatile organic compounds was successfully completed and the removal of soil and debris has reduced the potential exposure of contaminants. The MEC has performed removal actions, added fencing, warning signs, and patrols in order to further reduce exposure to MEC. The contaminated groundwater is not used as drinking water. While the project site is within the former Fort Ord, the site is within an area used for residential purposes. The project site is not located on or in the vicinity of any of the areas previously used as a landfill, dump, or munitions. As stated previously, no cleanup sites are listed on-site or in the vicinity of the proposed project.

The proposed project would include the demolition of four existing duplexes. Demolition of the buildings is not expected to use or involve storage of large quantities of hazardous materials. Potentially hazardous materials such as fuels, lubricants, and solvents could be used during grading and demolition of the proposed project. However, the transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22.

The on-site structures to be demolished are known to contain asbestos-containing materials (ACMs) and lead paint. The California Division of Occupational Safety and Health (Cal OSHA) requires that all workers be properly protected when working with materials containing any level of lead in accordance with the Title 8 CCR Section 1532.1. Current federal and state regulations require that only contractors who have been properly trained in the correct handling of ACMs may conduct removal and demolition activities, if the activities would disturb 100 square feet or more of ACM.

Compliance with applicable laws and regulations during demolition and construction of the proposed project, including but not limited to the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, and the California Code of Regulations Title 8 Section 1532.1 would reduce the potential impacts associated with the routine transport, use, storage, or disposal of hazardous materials.

LESS THAN SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The project site is located approximately 0.3 mile southwest of Marina High School. Additionally, the project site is not listed as a hazardous site by the Department of Toxic Substance Control or the State Water Resources Control Board and would comply with all applicable laws and regulations during demolition and construction. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school.

NO IMPACT

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

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

The project site is located approximately 1.8 miles southwest of the Marina Municipal Airport and approximately 5.9 miles north of the Monterey Bay Municipal Airport. There are no private airstrips in the area. While the site is within two miles of the Marina Municipal Airport, the site is not within the Airport Planning Area or an Airport Safety Zone (City of Marina 2006[b]). The project would not result in a safety hazard for people residing or working in the project area.

NO IMPACT

g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City of Marina has not adopted an evacuation or emergency response plan for the project area. The Monterey County Operational Area Tsunami Incident Response Plan incorporates the City of Marina. However, as the City of Marina has a very limited vulnerability to a tsunami, there are no residential areas within the City that would need evacuated in the event of a tsunami warning and the only areas within the evacuation zone are Marina State Beach and several beach access points through the dunes. The evacuation routes for these zones are Reservation Road east from the beach to Beach Road or Del Monte Boulevard, Lake Drive east from trail head to Palm Avenue, and Palm Avenue to Del Monte Boulevard. The project would not interfere with these routes, as access to the site would primarily be via Imjin Parkway, Third Avenue, and California Avenue. As a result, the project would not interfere with an adopted emergency response plan or emergency evacuation plan.

LESS THAN SIGNIFICANT IMPACT

h. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project site is located in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ), as designated by CAL FIRE (2008). Additionally, the area surrounding the project site is not located in a Fire Hazard Zone. While the project would increase population in the area, the site is adjacent to other developed areas and not in a wildland fire risk zone.

LESS THAN SIGNIFICANT IMPACT

9 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	■	☐
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	■	☐
d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	■	☐
e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	■	☐
f. Otherwise substantially degrade water quality?	☐	☐	■	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?	☐	☐	■	☐
h. Place structures in a 100-year flood hazard area that would impede or redirect flood flows?	☐	☐	■	☐
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam?	☐	☐	■	☐
j. Result in inundation by seiche, tsunami, or mudflow?	☐	☐	■	☐

a. Would the project violate any water quality standards or waste discharge requirements?

f. Would the project otherwise substantially degrade water quality?

The City of Marina General Plan Policy 3.57 requires that all storm water runoff be retained on-site and accommodated by localized retention basins. The retention basins should be landscaped and all on-site drainage should be designed to convey runoff from a 10-year frequency storm. The project would include a bio-retention basin at the north end of the project site, designed to slow and treat on-site stormwater runoff. The basin would be surrounded by a layered massing of water conserving shrubs, grasses, and groundcovers, as well as trees along the adjacent property line. The project site has a natural elevation change that would direct water from the southern portions of the site to the basin. The City of Marina recognizes that bio-retention systems are a highly efficient, natural way to improve water quality by filtering pollutants and removing excess nutrients (City of Marina 2014). The adequacy of the on-site and off-site drainage would be determined through the preparation of storm drainage reports and plans, approved by the Public Works Director. The incorporation of the bio-retention basin and approval from Public Works would ensure water discharge requirements are met and water quality is not substantially degraded.

LESS THAN SIGNIFICANT IMPACT

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

As discussed in Section 8, *Project Description*, the proposed project would receive water from the MCWD per the December 2017 agreement between FORA and the City of Marina (see Appendix I). Groundwater wells provide the sole source of water supply for the former Fort Ord, with wells tapping into the Salinas Valley Groundwater Basin (MCWD 2016). Development under the proposed project would not include installation of new groundwater wells, but would instead receive water from existing MCWD groundwater wells.

As described in further detail in Section 17, *Utilities and Service Systems*, although one of MCWD's source aquifers (the 400 Foot Aquifer) is in Critical Overdraft, implementation of the proposed project would not exacerbate those overdraft conditions. Groundwater extraction from the Salinas Valley Groundwater Basin is managed by the Monterey County Water Resources Agency (MCWRA) through monitoring and enforcement of groundwater allocations. Although the project would increase projected groundwater demand in excess of allocations for the Ord Community portion of the City of Marina, that increased demand would be accompanied by an equal increase in water rights allocation, as described further in Section 17, *Utilities and Service Systems*. The water rights allocation for the project was transferred from the United States Department of the Army through FORA to the City of Marina (Appendix I). The water rights allocation assigned to the Department of the Army far exceeds projected groundwater demand through the year 2035 (MCWD 2016). In addition, several regional groundwater management projects are being developed to address overdraft conditions in the Salinas Valley Groundwater Basin, including groundwater recharge projects, non-potable water reuse projects, and desalination projects (MCWD 2016).

Although current planning efforts have identified a groundwater supply shortfall in the Salinas Valley Groundwater Basin, the project would not contribute to this shortfall or result in a net deficit in aquifer volume or a lowering of the groundwater table because groundwater supplied to the project would be allocated to the City of Marina through FORA from the Department of the Army, whose groundwater allocation far exceeds projected demand through the year 2035 (MCWD, 2016; Appendix I). Although the project may result in a net increase in impervious surface area, the proposed project area represents a very small percentage of the total groundwater basin recharge area and implementation of the proposed project would not substantially interfere with groundwater recharge. Also, the project would include a bio-retention basin to minimize runoff and maximize on-site infiltration.

In summary, the proposed project would not result in an exceedance of safe yield or a significant depletion of groundwater supplies. Impacts related to groundwater would be less than significant

LESS THAN SIGNIFICANT IMPACT

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?

d. Would the project substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

e. Would the project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The project would not substantially alter the existing drainage pattern on the project site. The existing topography of the site would be maintained, with the northern portion being lower than

the southern. This would allow runoff to continue flowing from south to north, down the slope. Additionally, a stormdrain would run from the southwestern corner of the parking lot, along the rear of the building, and to the bio-retention basin. There is no stream or river that would be altered. All stormwater would be kept on-site via the proposed bio-retention basin on the northern portion of the site. Vegetation would be utilized to minimize erosion due to runoff.

The project site is currently developed with four duplex structures. The project would incrementally increase the amount of impervious surfaces on the site. However, stormwater would be directed from the impervious areas to the bio-retention basin via natural site topography and a stormdrain, which would direct the water from the southern end of the site. Therefore, the proposed project would not substantially increase erosion, siltation, runoff, or flooding.

The proposed project would disturb more than one acre during construction. As a result, the proposed project would be required to comply with the NPDES program for storm water discharges associated with construction activities, including through preparation of a SWPPP, which outlines BMPs that would address post-construction runoff. As described under Section VI, *Geology and Soils*, BMPs that are typically specified within the SWPPP may include, but would not be limited to: temporary measures during construction; revegetation; and structural BMPs. Compliance with the required SWPPP would further reduce potential impacts to water quality related to erosion and sedimentation.

LESS THAN SIGNIFICANT IMPACT

g. Would the project place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?

h. Would the project place structures in a 100-year flood hazard area that would impede or redirect flood flows?

The project site is not located in a 100-year flood zone (FEMA 2009). The project site is located outside of the 0.2 percent annual chance floodplain. The proposed project would not impede or redirect flood flows.

LESS THAN SIGNIFICANT IMPACT

i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam?

There are three major dams located in Monterey County: the Nacimiento Dam, the San Antonio Dam, and the Los Padres Dam. The Nacimiento Dam and San Antonio Dam are both located approximately 80 miles southeast of the project site, and the Los Padres Dam is located approximately 21 miles southeast of the project site in Carmel Valley. There are no levees in the vicinity of the site. Due to the distance of the site from these active dams, the site is not located in the inundation zone for any of the major dams in the area (Monterey County 2010). Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam

LESS THAN SIGNIFICANT IMPACT

j. Would the project result in inundation by seiche, tsunami, or mudflow?

Seiches are oscillations of the surface of inland bodies of water that vary in period from a few minutes to several hours. Seismic excitations can induce such oscillations. Tsunamis are large sea waves produced by submarine earthquakes or volcanic eruptions. The proposed project is not located in a designated tsunami inundation area per the 2009 Tsunami Inundation Map for Emergency Planning, Marina Quadrangle, and is inland from the tsunami inundation line (California Emergency Management Agency 2009). A seiche is unlikely as the project site is not near an inland body of water. While the project site does have some elevation change, there are no steep slopes located on or adjacent to the site and the project site is not at risk for mudflows.

LESS THAN SIGNIFICANT IMPACT

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10 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	■	☐
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	■	☐
c. Conflict with an applicable habitat conservation plan or natural community conservation plan?	☐	☐	■	☐

a. Would the project physically divide an established community?

The proposed project would develop new residential apartments on a site that is currently developed with residential duplexes. The site is surrounded by open land and land zoned for residential use. The project site is primarily surrounded by old army barracks that are planned for redevelopment as a senior community. The project site is outside of the boundary of the senior community project and would not create a division. The proposed project would not divide an established community, nor divide the planned Cypress Knolls senior development.

LESS THAN SIGNIFICANT IMPACT

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

The project site has a General Plan designation of Single Family Residential and is zoned Multi-Family Residential (R-4). The project requires a General Plan Map Amendment from Single Family Residential to Multi-Family Residential. The proposed General Plan designation would be consistent with the existing zoning designation for the site. With approval of this General Plan Amendment, the project would not conflict with the land use designation for the site.

The project would include 60 parking spaces. Marina Municipal Code Section 17.44.020 sets parking requirements for residential development within the City. One-bedroom units and efficiencies (studios) require one covered space for each dwelling unit plus one additional space for each five dwelling units. Two-bedroom units require one and a half spaces for each dwelling unit, one of

which is covered, and one additional space for each five dwelling units. The project would include 64 studio apartments and seven two-bedroom apartments. Based on Section 17.44.020, the project would require 89 parking spaces.[2] However, as the project would provide transitional housing for veterans, actual parking demand associated with the project is estimated to be less than is required under Marina Municipal Code. A Parking Generation Memo was prepared by Ron Marquez (Appendix F) to estimate parking demand for the proposed project. In order to estimate the amount of parking demand for the project, ITE's *Parking Generation 4th Edition* rate for Senior Adult Housing (land use 252) was used, as the most similar land use to the proposed project. Based on this land use, parking demand for the project would be 0.66 vehicles per unit, resulting in a total parking demand of 48 parking spaces. With 60 proposed parking spaces, the project would adequately meet anticipated parking demand. Additionally, street parking for approximately 20 vehicles could be accommodated on the south side of Hayes Circle. The provided parking spaces and street parking capacity would adequately serve residents and visitors.

Policy 2.31 of the Marina General Plan states the City's intent to promote construction of new housing that is environmentally and socially responsible. Affordable housing should be provided within the City, pursuant to the inclusionary housing requirement. Municipal Code Section 17.45.030 sets the inclusionary housing requirements at 15 percent very low income, 15 percent low income, and 10 percent moderate income for housing on the former Fort Ord. The project provides 100 percent affordability/inclusionary housing under the proposed rental pricing structure. The project would provide transitional housing to veterans, with half of the studio apartments rented at 30 percent of area median income (ami), half the studio apartments rented at 50 percent ami, three of the two-bedrooms rented at 30 percent ami, three two-bedrooms at 50 percent ami, and the manager's unit at no rent. This exceeds the requirements for inclusionary housing and is consistent with the housing goals of the General Plan.

Policy 4.17 of the Marina General Plan states that development should incorporate windrows into site landscaping. The project would be consistent with this requirement, as landscaping would include wind rows along the edges of the project site, including the rear (west) side between the project and the adjacent open space, the southern edge around the parking lot, and the northern edge around the bio-retention basin.

Additionally, the project site is within the former Fort Ord and subject to the Fort Ord Base Reuse Plan. According to land use concepts identified in the Fort Ord Base Reuse Plan, the project site is located within single family development/medium density residential development with residential infill opportunities. The project would constitute medium density residential and would be consistent with the Fort Ord Base Reuse Plan designation. The Fort Ord Base Reuse Plan Residential Land Use Policies and Programs Objective B looks to ensure compatibility between residential development and surrounding land uses. As the project would be residential, and the site is primarily surrounded by land designated as residential and planned for use as a senior community, the project would be consistent with Residential Land Use Policies and Programs Objective B.

As described above, the project is not anticipated to conflict with the City of Marina General Plan or the Fort Ord Base Reuse Plan.

LESS THAN SIGNIFICANT IMPACT

[2] (65*1) + (65/5) + (7*1.5) + (7/5)

c. Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?

As discussed in Section 4, *Biological Resources,* a HMP was developed for the Fort Ord Base Reuse Plan between the Army and the USFWS to protect open space and native habitats within the plan boundaries. The project site is identified as previously developed within the HMP and has been transferred to the City for redevelopment. However the project is consistent with the goals of the HMP as described in the Fort Ord Base Reuse Plan as an area of redevelopment. .

LESS THAN SIGNIFICANT IMPACT

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11 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a. Would the project 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?

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

The project site is not being used for mineral extraction. The site has been developed with residential uses and no known mineral resources are present on the property. The City of Marina General Plan (2010) does not identify any mineral resources in the area

NO IMPACT

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12 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	■	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c. A substantial permanent increase in ambient noise levels above those existing prior to implementation of the project?	☐	☐	■	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	■	☐	☐
e. For a project located in 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?	☐	☐	■	☐
f. For a project near a private airstrip, would it expose people residing or working in the project area to excessive noise?	☐	☐	■	☐

Noise is defined in this analysis as unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Because of the logarithmic scale of the decibel unit, sound levels cannot be added or subtracted arithmetically. If a sound's physical intensity is doubled, the sound level increases by 3 dBA, regardless of the initial sound level. For example, 60 dBA plus 60 dBA equals 63 dBA. Where ambient noise levels are high in comparison to a new noise source, the change in noise level would be less than 3 dBA. For example, when 70 dBA ambient noise levels are combined with a 60 dBA noise source the resulting noise level equals 70.4 dBA.

The time period in which noise occurs is important since noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (Ldn), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10:00 PM to 7:00 AM) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7:00 PM to 10:00 PM and a 10 dBA penalty for noise occurring from 10:00 PM to 7:00 AM. Noise levels described by Ldn and CNEL typically do not differ by more than 1 dBA. In practice, CNEL and Ldn are often used interchangeably.

Noise that is experienced at any receptor can be attenuated by distance or the presence of noise barriers or intervening terrain. Sound from a single source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receiver, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dBA of noise reduction. The manner in which buildings in California are constructed generally provides a reduction of exterior-to-interior noise levels of approximately 25 dBA with closed windows (FTA 2006).

The City of Marina has set allowable noise standards in the General Plan. Residential noise standards are shown in Table 6, below.

Table 6 City of Marina Allowable Noise Standards

	Maximum Exterior (dBA Ldn)		
Land Use Category	**Acceptable**	**Conditionally Acceptable**	**Maximum Interior (dBA)**
Residential	60	65	45
City of Marina General Plan (2010)			

a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

c. Would the project result in a substantial permanent increase in ambient noise levels above levels existing without the project?

Existing noise on the project site is primarily due to traffic on nearby roadways, including SR 1 and Imjin Parkway. Motor vehicle noise is characterized by a high number of individual events, which often create a sustained noise level. On January 12, 2016, Rincon Consultants, Inc. performed three

15-minute weekday sound measurements during the PM peak hour at the project site using an ANSI Type II integrating sound level meter. The noise monitoring results are summarized in Table 7.

Table 7 Estimated Existing Exterior Noise

Measurement Location	Distance to Primary Noise Source (feet)	Leq (dBA)
Southern End of Project Site, along Hayes Circle	65[1]	54.7
Central Part of Site, along Hayes Circle	30[1]	58.1
North End of Project Site	35[1]	56.7

Source: Rincon Consultants, Inc. Recorded during field visit using ANSI Type II Integrating sound level meter on January 12, 2016. See Appendix G for noise measurement results

[1] Distance to Hayes Circle

As shown in Table 7, existing noise at the project site ranges from 54.7 dBA Leq to 58.1 dBA Leq. There is no precise way to convert a peak hourly Leq to Ldn. However, in less heavily developed areas, such as suburban areas, the peak hourly Leq is often roughly equal to the daily Ldn (CSWRCB 2013). The project site is located in a suburban area; therefore noise at the project site would range from approximately 55 dBA Ldn to 58 dBA Ldn. Noise levels on the project site are below the City's acceptable maximum exterior noise standard for residential uses of 60 dBA. Therefore, on-site operational noise impacts would be less than significant.

The project would generate operational noise that is typical of residential development, including delivery trucks, noise associated with rooftop ventilation and heating (HVAC) systems, and outdoor conversations. Noise levels from HVAC equipment can reach 100 dBA at a distance of three feet (EPA 1971). HVAC units typically have noise shielding cabinets, placed on the roof or mechanical equipment rooms,. Shielding reduces HVAC noise levels to no greater than 55 dBA at a distance of 50 feet. Therefore, noise at existing nearby residences approximately 50 feet from the project site would be 55 dBA. Existing noise levels at nearby residences is approximately 57 dBA Leq. The addition of HVAC equipment would increase ambient noise levels to approximately 59 dBA Leq. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. The addition of HVAC equipment would increase ambient noise levels at nearby receptors by 2 dBA and would not be perceptible by residents. Therefore, impacts would be less than significant.

On-site activities would include trash hauling and delivery. Trash hauling and delivery trucks would access the site from Hayes Circle. Noise exposure from trash and delivery trucks would be similar to existing conditions on the site and is representative of noise levels within residential neighborhoods. Therefore, trash hauling and delivery truck noise would not result in a significant increase in ambient noise levels.

The project would create a long term increase in ambient noise due to traffic generation. As discussed in Section 16, *Transportation and Traffic*, the project would generate 248 average daily trips, with 14 trips during the AM peak hour and 18 trips during the PM peak hour (See Appendix F). Due to the logarithmic nature of sound, a doubling of sound energy is equivalent to an increase of 3 dBA. Therefore, an audible, 3 dBA increase in noise would occur only if traffic levels and associated noise energy along nearby roadways were to double. According to the Traffic Impact Memorandum (see Appendix F), the nearby intersection of Imjin Parkway and Third Avenue has a volume of 1,971 vehicles per hour. The vehicles trips that would be added by the project would be well below existing traffic volumes and would not double the amount of traffic on area roadways. In addition,

the amount of traffic generated on Third Avenue or Hayes Circle by the project would be a maximum of 14 trips during the AM peak hour and 18 trips during the PM peak hour. This level of traffic would not measurably increase noise level at sensitive receptors near the project site, including Hayes Circle. Therefore, traffic noise impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Operation of the proposed project would not perceptibly increase groundborne vibration or groundborne noise on the project site above existing conditions. The site is currently developed with residential uses and the proposed project would continue residential use.

Construction of the proposed project would temporarily generate groundborne vibration. Typical vibration levels associated with construction are shown in Table 8. The Federal Transit Administration has established a groundborne velocity threshold of 72 VdB for sensitive receptors, including residences where people normally sleep. The nearest sensitive receptors to the proposed project are residences located approximately 50 feet south of the project site and 50 feet east of the project site, across Hayes Circle. For the purposes of this analysis, both units were assumed to be occupied. Based on information presented in Table 8, below the nearby residences would be exposed to a maximum vibration level of approximately 80 VdB during project construction.

Table 8 Vibration Levels for Construction Equipment

	Approximate VdB	
Equipment	**25 feet**	**50 feet**
Loaded Trucks	86	80
Jackhammer	79	73
Small Bulldozer	58	52

Source: FTA, 2006

A VdB of 100 is the general threshold where minor damage can occur in fragile buildings (FTA, 2006). Because vibration levels would not reach 100 VdB, structural damage would not be expected to occur as a result of construction activities. The vibration levels at the residences across Hayes Circle would exceed the groundborne velocity threshold level of 72 VdB established by the FTA for residences where people normally sleep. However, per Section 9.24.040 of the Marina Municipal Code construction activities would be limited to City-mandated construction hours of 7:00 AM to 7:00 PM Monday through Saturday and 10:00 AM to 7:00 PM on Sunday. Because no construction would occur at night during normal sleeping hours, no vibration impacts would occur during this time and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

The project would generate temporary noise during construction. Noise from construction of the project would be generated by demolition of the existing duplex structures, construction activities, and from construction vehicles access the site. The nearest noise-sensitive land uses include the duplex structures approximately 50 feet to the south and east of the project site.

Noise impacts are a function of the type of activity being undertaken and the distance to the receptor location. Table 9 shows the typical noise levels from construction activities at a distance of 50 feet.

Table 9 Typical Noise Levels from Construction

Equipment On-site	Typical Noise Level (dBA Leq) 50 Feet from the Source
Air Compressor	81
Backhoe	80
Concrete Mixer	85
Crane, mobile	83
Dozer	85
Jack Hammer	88
Paver	89
Saw	76
Truck	88

Noise levels assume a noise attenuation rate of 6 dBA per doubling of distance.
Source: FTA, 2006

Typical noise levels from individual pieces of construction equipment range from about 76 to 89 dBA Leq at a distance of 50 feet. The City of Marina Municipal Code, Ordinance 15.04.055, limits construction in the City to the hours of 7:00 AM to 7:00 PM Monday through Saturday and between 10:00 AM and 7:00 PM on Sundays and holidays. This would prevent construction from occurring on-site during normal sleeping hours. Additionally, Section 15.04.055 of the Marina Municipal Code states that construction noise cannot be greater than 60 dBA at a receiving property line form more than 25percent of an hour (Marina Municipal Code, Ordinance 15.04.055). Mitigation is necessary to minimize construction noise and to reduce the impact from noise on nearby residences.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

The following mitigation measures are required if residences adjacent to the project site are occupied at the time of project construction.

N-1 Mufflers

Construction equipment shall be properly maintained and all internal combustion engine driven machinery with intake and exhaust mufflers and engine shrouds, as applicable, shall be in good condition and appropriate for the equipment. During construction, all equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers, consistent with manufacturers' standards.

N-2 Electrically-Powered Tools and Facilities

To the extent practical, electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.

N-3 Stationary Equipment

All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receptors.

N-4 Equipment Staging Areas

Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors.

e. For a project located in 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?

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

The nearest airport is the Marina Municipal Airport, approximately 1.5 miles northeast of the project site. The project is not located within the Marina Municipal Airport Planning Area. The project is not located within the vicinity of a private airstrip. Therefore, the project would not expose people residing or working in the project area to excessive noise levels from airport or air strip operations.

LESS THAN SIGNIFICANT IMPACT

13 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	■	☐
b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	■	☐
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	■	☐

a. Would the project induce substantial 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)?

The project would directly induce population growth through the addition of 64 studio apartments and seven two-bedroom apartments. The apartments would provide supportive housing for veterans, with a priority for homeless veterans. Veterans would be allowed to reside at the service-based property in perpetuity, as opposed to transitional housing which limits the tenure of tenants.

Based on data from the DOF, current (2018) population of Maria is 22,424 and the average household size is 2.91 persons per household (DOF 2018). The project would add 71 residential units (71 units x 2.92 persons/unit), which would increase the City population by approximately 208 persons.[3] The draft Association of Bay Area Governments population forecast for the City of Marina in 2020 is 23,470 persons (AMBAG 2018). An increase in 208 persons would increase the population to 22,632 persons, which is within the 2020 population growth forecast for Maria. The project would be consistent with regional growth forecasts.

LESS THAN SIGNIFICANT IMPACT

[3] An increase in 208 persons is a conservative estimate because the average household sizes for the project are expected to be lower than the DOF Marina average. The project would provide veteran housing in 64 studios and seven two-bedroom units. The 71 units may therefore result in as few as 78 new residents.

b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The project would include the demolition of four duplex structures. However, the structures would be replaced with a 71 unit apartment complex. The project would result in a net gain of 64 residences and would not require the construction of replacement housing elsewhere. The four existing duplex structures are vacant and no residents would be displaced as a result of the project.

LESS THAN SIGNIFICANT IMPACT

14 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
1 Fire protection?	☐	☐	■	☐
2 Police protection?	☐	☐	■	☐
3 Schools?	☐	☐	■	☐
4 Parks?	☐	☐	■	☐
5 Other public facilities?	☐	☐	■	☐

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the 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?

The project site is currently served by the Marina Fire Department and is located approximately 0.75 mile south of the Marina Fire Station. In order to allow sufficient first-responder access, a fire truck pullout would be provided on Hayes Circle, adjacent to the existing fire hydrant. The Fire Department has been involved in the project design process, and final Fire Department approval will be required prior to construction.

The project would incrementally increase the demand for fire services. In 2014, the Marina Fire Department responded to a total of 1,969 calls, 43 of which were fires, 1,416 were rescue & emergency medical services, 176 were hazardous conditions with no fire, 134 were service calls, 121 were good intent calls, 73 were false alarms & false calls, two were overpressure rupture/explosion/overheat with no fire, and four were special incidents (Marina Fire Department 2015). This was an increase of 205 over 2013 calls (Marina Fire Department 2015). Increases in calls to the fire department can cause call stacking, when there are two or more calls for service that are simultaneous and require department resources to respond, and increased response times. However, the 1,969 calls average to 0.1 call per resident of Marina in 2014 (1,969 calls per 20,872

residents). Using this average, the 208 residents of the project would generate approximately eight calls in a calendar year, which would not require the provision of new or physically altered governmental facilities, the provision of which could result in adverse physical impacts.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The project site is currently served by the Marina Police Department and is located approximately 0.75 mile south of the Police Station. The Marina Police Department has 29 sworn officers, including a Police Chief, two Commanders, four Sergeants, two Corporals, and twenty officers (City of Marina 2016). In 2014, the Police Department responded to 34,091 calls for service and filed 3,179 reports, both of which were down from 2013 numbers (Marina Police Department 2015). While the project would increase the population on the project site by approximately 208 residents, the project would not introduce a substantial new demand on police services. The project would give preference to homeless veterans, thereby decreasing homelessness in the City of Marina and surrounding area. Homeless encampments within Marina have many issues associated with them and require Police attention, including safety. As the project location is already served by the department and the new residences would assist in reducing homeless populations, the project would not require the construction of any new facilities to continue service.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The project would be served by the Monterey Peninsula Unified School District (MPUSD), and school-aged residents would attend Marina High School, Los Arboles Middle School, and/or Marina Vista Elementary School. While the project would include 71 new residences, as supportive housing for veterans, the amount of children living at the facility would be low. 64 of the units would be studio apartments and would not be expected to house school age children. The family wing would include seven two-bedroom units and could potentially house school-age children. The student generation rates for MPUSD were estimated by MPUSD for the Monterey Downs and Monterey Horse Park and Central Coast Veterans Cemetery Specific Plan (MPUSD 2015). These low, medium, and high generation rates were used to estimate the number of additional elementary, middle, and high school students would result from the proposed project (see Table 11).

Table 10 MPUSD Student Generation Rates

Grade Level	Yield Rate	Student Generation Factor	Number of Residential Units	Number of Students Generated
K-5	Low	0.15	7	1
	Medium	0.25		2
	High	0.30		2
6-8	Low	0.05		0
	Medium	0.08		1
	High	0.10		1
9-12	Low	0.07		0
	Medium	0.12		1
	High	0.15		1
Maximum All Grade Levels				4

Source: MPUSD 2015

Based on the student generation rates, the maximum amount of students the project would generate would be four students, spread out between kindergarten and twelfth grade. This is a minimal increase and would not adversely impact the school system or require the construction of new facilities. In addition, the project applicant would be required to pay state-mandated school impact fees, which fully mitigate project impacts related to school capacity according to California Government Code §17620.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Please refer to Section 15, *Recreation.*

LESS THAN SIGNIFICANT IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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 other public facilities?

Library services are provided by Monterey County Free Libraries. The closest library to the project site would be the Marina Branch Library, located at 190 Seaside Circle in Marina. The proposed addition of 208 residents would incrementally increase use of the existing library facilities. However, increased demand would be nominal.

Impacts to other public facilities (e.g., roadways, sewer, and storm drains) are discussed in Sections 16, *Transportation/Traffic*, and Section 17, *Utilities and Service Systems*.

LESS THAN SIGNIFICANT IMPACT

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15 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	■	☐
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?	☐	☐	■	☐

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?

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?

According to the City of Marina General Plan, the City of Marina has a total of 96.7 acres of local and community-serving park and recreation space. This includes the sports center, teen center, equestrian center, and school playfields. The ratio of parks and recreation land to population is 4.3 acres, per 1,000 residents (96.7 acres/22,424residents*1,000). Another 477 acres of land in the former Fort Order area is set aside for parks and recreation purposes and an additional 182 acres has been set aside for parks and recreation on Armstrong Ranch. The City of Marina's estimated 2018 population is 22,424 persons (DOF 2018). The proposed project would add an additional 71 units (a net increase of 63 units) and approximately 208 persons (see Section 13, *Population and Housing*). This increase would not reduce the ratio of park and recreation acreage to residents to below 4.3 acres per 1,000 residents. No construction or expansion of recreational facilities would be required. Additionally, the project would include a playground area for children living in the Family Wing, and the developer would be required to pay applicable Quimby Act fees. Therefore, the project would not increase the use of existing parks such that substantial physical deterioration would occur, nor would the project require the construction of new or expanded recreational facilities.

LESS THAN SIGNIFICANT IMPACT

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16 Transportation/Traffic

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	■	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	■	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	■	☐
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	■	☐
e. Result in inadequate emergency access?	☐	☐	■	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?	☐	☐	■	☐

The following analysis is based on a traffic impact memorandum prepared for the proposed project (Ron Marquez, March 2016), included as Appendix H to this IS-MND.

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

The 71 new units at the project site would cause an increase in traffic on Hayes Circle and the surrounding roadways. In order to estimate the number of trips generated by the project, the Institute of Transportation Engineers (ITE), *Trip Generation 8th Edition* rate for Senior Adult Housing (land use 252) was used. This land use was selected as it was determined to be the most fitting for the project's use as supportive housing for veterans. Although the traffic memorandum for the project was prepared in 2016, the information and conclusions remain accurate as of May 2018 (Marquez 2018). Trip generation for the proposed project is shown in Table 11, below.

Table 11 Trip Generation for Proposed Supportive Veterans Housing

Land Use	ITE Land Use Code	Project Size (Units)	Daily Trip Rate	Daily Trips	AM Peak Hour Rate	AM Peak Hour Trips	PM Peak Hour Rate	PM Peak Hour Trips
Veterans Housing	252	72	3.44	248	0.20	14	0.25	18
Added New Trips				248		14		18

Source: Marquez 2016

As shown in Table 11, the project would generate a total of 248 daily trips, including 14 AM peak hour trips and 18 PM peak hour trips. The City of Marina requires further analysis of traffic impacts if a project generates 25 or more trips per hour. The trips generated by the proposed project would not exceed this limit. However, the nearby intersection of Imjin Parkway and Third Avenue has been identified as impacted by previous traffic studies. In order to ensure that the proposed project would not adversely impact the intersection of Imjin Parkway and Third Avenue, the effect of the project trips on the intersection were analyzed.

The intersection of Imjin Parkway and Third Avenue is a two-way, stop controlled intersection, with stop controls on the Third Avenue, a minor north/south street. The existing traffic counts were taken from the Cypress Knolls Traffic Impact Analysis and corroborated against the 2015 counts made by the Transportation Agency of Monterey County for both morning and evening peak hours. Distribution of traffic generated by the proposed project is expected to be 35 percent incoming and 65 percent outgoing in the morning peak hour and 60 percent incoming and 40 percent outgoing in the evening peak hour. For the purpose of the analysis, it was conservatively assumed that every trip would be directed to the intersection. The existing and projected Level of Service (LOS) for the intersection are shown in Table 12.

Table 12 Existing and Projected Conditions at Imjin Parkway and Third Avenue

	AM Peak Hour		PM Peak Hour	
	LOS	**Approach Delay**	**LOS**	**Approach Delay**
Existing Conditions	D	30.4 seconds	D	30.1 seconds
Projected Conditions with Project	D	32.2 seconds	D	31.9 seconds

Source: Traffic Impact Memorandum, Appendix H

As shown in Table 12, the traffic generated by the project would not lower the LOS at the intersection during the AM peak hour or the PM peak hour. There would be a minimal increase in the approach delay of less than two seconds for both the AM and PM. The project would be required to pay traffic impact fees, which would contribute to mitigating the traffic impacts from the project and other potential development in the area.

LESS THAN SIGNIFICANT IMPACT

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

As discussed above, the project would have minimal impact on the intersection at Imjin Parkway and Third Avenue. The signalization of the intersection at Imjin Parkway and Third Avenue is included in the Marina Impact Fee Program as mitigation for increased traffic due to potential development in the area (Marquez 2016). The project would be required to pay traffic impact fees which are be used to implement improvements, including the signalization of the impacted intersection.

LESS THAN SIGNIFICANT IMPACT

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The project site is located approximately 1.5 miles south of the Marina Municipal Airport. The site is not part of the airport land use plan nor included in the Runway Protection Zone. As the project is not located in the planning area of the airport, the project would not cause a change in air traffic patterns at the airport.

NO IMPACT

d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

e. Would the project result in inadequate emergency access?

The project would not include any design features that would increase transportation hazards. The existing roadways are of an adequate width and would not be altered for the project. Access to the project would continue to be from Hayes Circle and would not require the construction or alteration of any roadways. A fire truck pullout would be constructed on Hayes Circle adjacent to the project to facilitate emergency access and decrease roadway hazards. The project would not introduce any design hazards or incompatible use to the roadways.

LESS THAN SIGNIFICANT IMPACT

f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

The project would be limited to site-specific improvements and would not alter or damage the performance or safety of any public transit, bikeway, or pedestrian facility. The existing public trail at the rear (west) of the project site would be re-aligned to run alongside the project, uninterrupted. This would allow continued access to the open space and trails west of the project site. Additionally, landscaping would be provided at the front and rear of the project, maintaining the quality of the pedestrian environment on the front sidewalk and the public trail, respectively. Four foot wide sidewalks are currently provided on both sides of Hayes Circle. The project site is located approximately 0.5 mile from the nearest bus stop at Imjin Parkway and Third Avenue. Additionally, the project would include on-site storage for eight bicycles at the main entrance and covered bike storage on the ground floor of the family wing. The project would have no impact with respect to adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, and would not otherwise substantially reduce the performance or safety of such facilities.

LESS THAN SIGNIFICANT IMPACT

17 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. 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	☐	☐	☐	■
b. 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 Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. 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
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is 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)?

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed for the APE, or project site. The search did not reveal any specific site information or cultural resources within the APE. Because the project site does not contain a known resource 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), there would be no impact.

NO IMPACT

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1?

Because the NAHC and CHRIS searches are not exhaustive, 13 area Native American tribes were contacted regarding the project and to inquire if the tribes had any knowledge of cultural resources within the project vicinity. Three responses were received. Valentin Lopez, Chairperson of the Amah Mutsun Tribal Band, stated that Marina is outside of their territory and they have no comment. Tony Cerda, Chairperson for the Coastanoan Rumsen Carmel Tribe, stated that the project is very important to his tribe and the tribe has veteran members who desire to be involved with the project. Irenne Zwierlein, Chairperson of the Amah Mutsun Tribal Band of Mission San Juan Bautista, stated that Fort Ord has been grazed and consequently she does not believe that any cultural resources would be identified, however requests the presence of a Native American cultural resources monitor at the APE if any Native American cultural resources are discovered during the project.

Although unlikely, there is the possibility of encountering undisturbed subsurface tribal cultural resources. The proposed excavation of the site could potentially result in adverse effects on unanticipated tribal cultural resources. However, impacts from the unanticipated discovery of tribal cultural resources during construction would be less than significant with Mitigation Measure TCR-1.

TCR-1 Unanticipated Discovery of Tribal Cultural Resources

In the event that cultural resources of Native American origin are identified during construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the City determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native

American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archeologist and the appropriate Native American tribal representative.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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18 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	■	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	■	☐
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	■	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	■	☐
e. 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?	☐	☐	■	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	■	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	■	☐

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

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

e. Would the project 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?

The project would be served by the Marina Coast Water District (MCWD) for sewer service. MCWD currently provides sewer services to the existing duplexes on the site. The main point of connection for water services would be on Hayes Circle, across from the center of the property. A new sewer manhole and mainline pipe would be constructed along Hayes Circle, at the north end of the site, per MCWD standards, and the existing manhole and pipe would be demolished. The new pipe would be reviewed by MCWD in order to ensure capacity for the project.

Wastewater would be treated by the Monterey Regional Water Pollution Control Agency (MRWPCA) at the Regional Treatment Plant, approximately two miles north of the City. The Regional Treatment Plant has the capacity to treat 29.6 million gallons of wastewater per day and is currently receiving 18.5 million gallons of wastewater per day (MRWPCA 2016). The MRWPCA estimated that multi-family residential sewage generation is 73.22 percent of 189 gallons per day, or 138.4 gallons per day (City of Monterey, 2016). The project would generate an additional 71 units and generate 9,827 gallons of sewage per day. This is a high estimate, as 64 of the project units would be single occupancy studio apartments. The additional 9,827 gallons of sewage per day is less than a 0.1 percent increase over the current amount of wastewater received by MRWPCA each day and the Regional Treatment Plant would remain under capacity. The amount of wastewater created by the project would not exceed the available capacity at the Regional Treatment Plan or require the construction of new or expanded wastewater treatment facilities.

LESS THAN SIGNIFICANT IMPACT

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

The project would include the construction of a bio-retention basin at the northern (low) end of the site. The natural topography of the project site would direct stormwater to the basin and would retain all stormwater on-site. The adequacy of the on-site and off-site drainage facilities would be determined through review and approval of storm drainage reports and plans by the City Public Works Director. The project would not require construction of any new or expansion of any existing city stormwater drainage facilities. The bio-retention basin is recognized by the City of Marina as a natural and efficient way to improve water quality (City of Marina 2014).

LESS THAN SIGNIFICANT IMPACT

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

The project would increase demand for potable water. Per the December 2017 agreement between FORA and the City of Marina, there are 15 AFY available for use by the project (Appendix I). As

detailed in Amendment No. 7 of the *Memorandum of Agreement between the United States of America acting by and through the Secretary of the Army, United States Department of the Army, and the Fort Ord Reuse Authority for the Sale of Portions of the Former Fort Ord located in Monterey County, California*, dated June 20, 2000, as amended (Appendix I, Exhibit A), the Government of the United States of America transferred the right to use up to 15 AFY of unutilized Government Water Rights to FORA for the purposes of FORA making such 15 AFY available to the City of Marina for use at the Veterans Transition Center project. As discussed in Amendment No. 7, the Monterey County Water Resources Agency (MCWRA) confirmed the transferability of those 15 AF of water and consented to the permanent transfer of those water rights as described above. Water for the proposed project would be supplied by the Marina Coast Water District (MCWD), which supplies water through an interconnected water supply system to the Central Marina service area and the Ord Community service area (MCWD 2016). The sole source of water supply for the MCWD is the Salinas Valley Groundwater Basin (MCWD 2016). MCWD extracts groundwater from several wells that draw from the Deep Aquifer and the 400 Foot Aquifer in the Salinas Valley Groundwater Basin (MCWD 2016).

The California Department of Water Resources (DWR) has declared that the 180/400 Foot Aquifer is in Critical Overdraft, and must be managed under a groundwater sustainability plan by January 31, 2020 (MCWD 2016). The Ord Community portion of the City of Marina is projected to experience a groundwater shortage of 379 AFY by 2035 (MCWD 2016). Several regional groundwater management projects are being developed to address this overdraft condition, including groundwater recharge projects, non-potable water reuse projects, and desalination projects (MCWD 2016). Although the project would increase groundwater demand compared to projections in MCWD's 2015 Urban Water Management Plan (2016), that increased demand would be accompanied by an equal increase in water rights (allocation) per the water rights transfer agreement described above and included in Appendix I. The water rights would be transferred from the United States Department of the Army, whose projected groundwater demand in 2035 is far below their existing water rights allocation (MCWD 2016). Therefore, use of up to 15 AFY for the proposed project would not contribute to overdraft conditions in the Salinas Valley Groundwater Basin.

Assuming that water use is approximately 120 percent of wastewater generation (City of Los Angeles 2006), the project would demand approximately 11,792 gallons of water per day, or 13.2 AFY. Therefore, sufficient water supplies would be available to serve the project from the existing agreement described above and included in Appendix I. No new or expanded entitlements would be needed to serve the proposed project. The project would not result in a substantial physical deterioration of public water facilities or result in adverse physical impacts from new or expanded utility facilities due to increased use as a result of the project. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

The project would be served by the Monterey Regional Waste Management District (MRWMD). Solid waste is taken to Monterey Peninsula Landfill 3.5 miles northeast of the project site. The Monterey Peninsula Landfill has an approximate capacity of 84 million cubic yards, of which 71 million cubic yards is remaining (MRWMD, 2016(a)). Per the Solid Waste Facility Permit, the peak tonnage of incoming waste at the Monterey Peninsula Landfill is not to exceed 3,500 tons per day.

Currently, the Monterey Peninsula Landfill receives approximately 300,000 tons per year, which is less than 1,000 tons per day and below the limit set by the permit.

An average residential unit produces 12.23 pounds of solid waste per day (City of Los Angeles 2006). The project would have a total of 71 units, generating approximately 869 pounds of solid waste per day. This waste production estimate is conservative, as it does not take account of any recycling, composting, or other waste diversion programs. Additionally, since the majority of the project units (64) would be studios, and solid waste generation would likely be lower than average for these units. The additional solid waste production by the project would not significantly reduce the capacity of the Monterey Peninsula Landfill to serve Monterey County, now or in the future.

LESS THAN SIGNIFICANT IMPACT

g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Then State of California has mandated that solid waste diversion be at 50 percent since 2000 (AB 939). MRWMD has reached and surpassed the 50 percent diversion rate (MRWMD 2016[b]). In 2013, a new goal was set of 75 percent waste diversion by the year 2020 (CalRecyle 2017). MRWMD has multiple programs in place to continue compliance with waste diversion goals, including compost, recycling, materials recovery, and renewable energy generation. As the proposed project would be a part of MRWMD, the project would be in compliance with waste regulations.

LESS THAN SIGNIFICANT IMPACT

19 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, 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?	☐	■	☐	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	■	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	☐

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

The proposed project has the potential to adversely affect four special status plant species, one special status animal species, and nesting birds. As detailed in Section 4, *Biological Resources*, required mitigation would include worker awareness training (B-1), special status plant avoidance (B-2), Monterey spineflower mitigation (B-3), black legless lizard preconstruction surveys (B-4), and nesting bird surveys and avoidance (B-5). Pursuant to implementation of these mitigation measures, project impacts would be less than significant. As a result, the project would not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. In addition, as discussed in Section 5,

Cultural Resources, there would be no impacts to historical resources. Therefore, demolition of the existing on-site structures and construction of the proposed apartment complex would not eliminate important examples of the major periods of California history or prehistory.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

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)?

As described in the discussion of environmental checklist Sections 1 through 18, all impacts associated with the proposed project can be reduced to a less than significant level with the application of required mitigation measures. Cumulative impacts for each applicable resource area have been addressed in the individual resource sections above, including Air Quality, Biological Resources, Greenhouse Gas Emissions, Hydrology and Water Quality, Transportation/Traffic, and Solid Waste (See CEQA Guidelines Section 15064(h)(3)). As described above, the project would not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The traffic that would be generated by the project would be less than 25 vehicle trips during the peak hour and would not substantially contribute to cumulative traffic level increases. Impacts to agricultural, cultural, and mineral resources were determined not to occur. Therefore project impacts would not contribute to cumulative impacts. Impacts for other issue areas would project-specific and would be addressed in a case-by-case basis for each project. There are no other known projects in development or under consideration that would affect the other resource areas.

LESS THAN SIGNIFICANT IMPACT

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise. As detailed in the preceding responses, the proposed project has the potential to cause impacts related to noise. However, with the stated mitigation measures, impacts would be reduced to a less than significant level. Impacts related to air quality and hazardous and hazardous materials were determined to be less than significant.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

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List of Preparers

Rincon Consultants, Inc. prepared this IS-MND under contract to the City of Marina. Persons involved in data gathering analysis, project management, and quality control are listed below.

RINCON CONSULTANTS, INC.

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Megan Jones, MPP, Senior Program Manager
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Kari Zajac, MESM, Associate Planner
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Responses to Comments on the Draft IS-MND

This section includes the comments received during circulation of the Draft Initial Study and Mitigated Negative Declaration (IS-MND) prepared for the Veterans Transition Center Project and responses to those comments.

The Draft IS-MND was circulated for a 30-day public review period that began on June 15, 2018, and concluded on July 16, 2018. The City received two comment letters on the Draft IS-MND; one from the California Department of Transportation (Caltrans) and one from the California Governor's Office of Planning and Research, State Clearinghouse Division (SCH). Under the California Environmental Quality Act (CEQA) there is no requirement to prepare response to comments for a Mitigated Negative Declaration [CEQA Guidelines § 15074(b).] Even in the context of an Environmental Impact Report, response to comments "…need only respond to significant environmental issues…" [CEQA Guidelines § 15204(a)]. Nevertheless, the City herein addresses the issues raised in the comment letters submitted on the Draft IS-MND.

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1). Corrections or additional text discussed in the responses to comments are also shown in the text of the Final IS-MND in strikethrough (for deleted text) and underline (for added text) format.

DEPARTMENT OF TRANSPORTATION
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Letter 1

Serious drought
Help save water!

July 12, 2018

MON-1-R84.995
SCH# 2018061033

Christine Hopper
City of Marina
Community Development Department
209 Cypress Avenue
Marina, CA 93933

Dear Ms. Hopper:

COMMENTS FOR THE MITIGATED NEGATIVE DECLARATION (MND) – VETERANS TRANSITION CENTER PROJECT, MARINA, CA

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the Veterans Transition Center Project, which proposes building a 71-unit apartment complex on 2.4 acres in Marina. Caltrans offers the following comments in response to the MND:

1. The traffic study provided only traffic analysis for the Imjin Parkway and 3rd Avenue intersection. Caltrans requests further information on the project impacts at both the Imjin Parkway/2nd Avenue intersection and on the northbound and southbound Highway 1/Imjin Parkway ramps. Capacity and Highway Capacity Manual (HCM) analysis is requested for these two intersections. 1.1

2. Caltrans requests further analysis of the potential operational impacts this project will have on Highway 1, including a weaving and merge/diverge analysis. Having this information (as well as information for #3) will be helpful for full disclosure. It may be possible to use analyses from other recent studies in the area. 1.2

3. This project uses the "Senior Adult Housing" Land Use 252. However, the description in the MND includes family units, children play areas, and 60 parking spaces which stands out as inconsistent in the document. It seems more appropriate to use "Apartment," Land Use 220, as this better fits the nature and potential long-term use of the units. 1.3

4. The Transportation Agency for Monterey County (TAMC) collects development impact fees to help fund transportation projects of regional significance to address project long-range traffic impacts. Caltrans supports payment of the adopted TAMC development impact fees as required to mitigate any cumulative impacts for future development projects. 1.4

5. Caltrans supports this project addressing cumulative impacts through the City of Marina's Impact Fee Program which provides mitigation measures to address cumulative local impacts. Caltrans appreciates the mitigation effort to signalize the Imjin Parkway and 3rd Avenue intersection. 1.5

6. Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development. Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals. 1.6

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3157 or email christopher.bjornstad@dot.ca.gov.

Sincerely,

Chris Bjornstad

Christopher A. Bjornstad
Transportation Planner
District 5 Development Review

cc: TAMC

Letter 1

COMMENTER: **Christopher A. Bjornstad, Transportation Planner, California Department of Transportation, District 5**

DATE: **July 12, 2018**

Response 1.1, 1.2, and 1.5

The commenter indicates that the traffic study provided a traffic analysis for the Imjin Parkway and 3rd Avenue intersection; however, requests further information on the project impacts at both the Imjin Parkway/2nd Avenue intersection and on the northbound and southbound Highway 1/Imjin Parkway ramps. Capacity and Highway Capacity Manual analysis is requested for these two intersections. For purposes of full disclosure, the commenter requests further analysis of the potential operational impacts the project would have on Highway 1, including a weaving and merge/diverge analysis. The commenter indicated it may be possible to use analysis from other recent studies in the area.

The proposed development does not generate enough peak hour trips to warrant additional intersection analysis. CALTRANS Traffic Impact Study Guidelines suggest thresholds at which further analysis would be appropriate, but the project does not meet these thresholds. Furthermore, the City of Marina, as standard practice, has used 25 additional peak hour trips at an intersection as the threshold for analysis. The project does not add 25 new peak hour trips to any intersection in the City. The additional intersections and segments requested by the commenter to be studied have been studied in recent comprehensive analyses. These studies have been used to structure the City's Traffic Impact Improvement fees, which are intended to address the cumulative impacts of build-out in the City, including the intersections identified by the commenter. Traffic impacts, thresholds, and fees are discussed in Section 16 of the Environmental Checklist, *Transportation/Traffic.*

Response 1.3

The commenter discusses the selection of the land use type, “Senior Adult Housing” Land Use 252, for traffic calculations, and states that the description of the project in the IS-MND is inconsistent with this land use type. The commenter states that is seems more appropriate to use land use type, “Apartment,” Land Use 220, as it better fits the nature and potential long-term use of the units.

The development is an atypical apartment complex, as it is designed specifically to meet the needs of veterans. The project consists of 64 studio units and 7 two-bedroom units. There is limited empirical data on the trip generation of single room occupancy trip generation rates. A data search indicated that the City of San Diego publishes a trip generation rate of 2.5 trips per unit of this kind. This rate is lower than the rate used for this project, which uniformly used the Senior Adult Housing trip generation rate of 3.44 for all units. Assuming that the seven larger units would generate trips at an apartment rate, as suggested by the commenter, the total trip generation would be less than estimated in the project traffic analysis. Although the anticipated tenants are not all seniors, the rates identified for senior facilities match the likely trip generation for the project.

Response 1.4 and 1.6

The commenter supports payment of the adopted Transportation Agency for Monterey County (TAMC) development impact fees required to mitigate any cumulative impacts for future development projects. The commenter also supports this project addressing cumulative impacts through the City of Marina's Impact Fee Program, which provides mitigation measures to address cumulative local impacts. Furthermore, the commenter supports local development that is consistent with State planning priorities.

The City has adopted a program to assess traffic impact fees on all development, which is intended to address Citywide impacts including those that may occur at the facilities addressed in these comments. As discussed in Section 16 of the Environmental Checklist, *Transportation/Traffic*, the project would have a minimal impact on the intersection at Imjin Parkway and Third Avenue. The signalization of the intersection at Imjin Parkway and Third Avenue is included in the Marina Impact Fee Program as mitigation for increased traffic due to potential development in the area (Marquez 2016). The project would be required to pay traffic impact fees which are be used to implement improvements, including the signalization of the impacted intersection.

Letter 2

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

July 13, 2018

Christine Hopper
City of Marina
209 Cypress Avenue
Marina, CA 93933

Subject: Veterans Transition Center (Lightfighter Village)
SCH#: 2018061033

Dear Christine Hopper:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on July 12, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. 2.1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2018061033
Project Title Veterans Transition Center (Lightfighter Village)
Lead Agency Marina, City of

Type MND Mitigated Negative Declaration

Description The proposed project would include demolition of the existing four on-site vacant duplex structures and construction of a 54,480 sf, three-story, 71-unit apartment complex organized into a main building and a family wing, connected via a covered walkway. Located on 2.4 acres, the project would have a residential density of 30 units per acre. Outdoor features would include a community garden, community courtyard, and children's playground. The site would be accessed via two entrances off Hayes Circle. The existing informal, public trail at the southwestern edge of the property would be realigned off property. Potable water would be provide through transfer of water from the Fort Ord Reuse Authority to the city of Marina. Sewer service would be provided by the Marina Coast Water District.

Lead Agency Contact

Name Christine Hopper
Agency City of Marina
Phone (831) 884-1238 **Fax**
email
Address 209 Cypress Avenue
City Marina **State** CA **Zip** 93933

Project Location

County Monterey
City Marina
Region
Lat / Long 36° 40' 20" N / 121° 48' 26" W
Cross Streets 229-239 Hayes Circle
Parcel No. 031-021-040
Township **Range** **Section** **Base**

Proximity to:

Highways hwy 1
Airports Marina Municipal Airport
Railways SPRR
Waterways Pacific Ocean
Schools Marina HS
Land Use single family res LUD; Multi family res zoning

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Tribal Cultural Resources; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 4; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 5; Office of Emergency Services, California; Department of Housing and Community Development; Regional Water Quality Control Board, Region 3; State Water Resources Control Board, Division of Drinking Water; Native American Heritage Commission; Public Utilities Commission; California Department of Justice, Attorney General's Office

Document Details Report
State Clearinghouse Data Base

Date Received 06/13/2018 ***Start of Review*** 06/13/2018 ***End of Review*** 07/12/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

Letter 2

COMMENTER: **Scott Morgan, Director, State Clearinghouse**

DATE: **July 13, 2018**

Response 2.1

The commenter states that the IS-MND was submitted to selected state agencies for review and that the review period has closed without comment from those agencies. No response to this letter is required.