Revised Carmel Valley Manor Sewer Main Extension Project

Addendum to the Initial Study – Mitigated Negative Declaration

SCH#2020070582

prepared by

Carmel Area Wastewater District
3945 Rio Road
Carmel, California 93922
Contact: Rachél Lather, Principal Engineer

prepared with the assistance of

Rincon Consultants
2511 Garden Road Suite C-250
Monterey, California 93940

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RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

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Acronyms and Abbreviations

BRA	Biological Resources Assessment
CAWD	Carmel Area Wastewater District
CEQA	California Environmental Quality Act
CNPS	California Native Plant Society
CRLF	California red-legged frog
DOC	California Department of Conservation
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
IS-MND	Initial Study – Mitigated Negative Declaration
MCC	Monterey County Code
MGD	million gallons per day
MMRP	Mitigation Monitoring and Reporting Plan
PVC	polyvinyl chloride
SCH	State Clearinghouse
USFWS	United States Fish and Wildlife Service

Introduction

This document has been prepared to serve as an addendum to the previously approved Initial Study-Mitigated Negative Declaration (IS-MND) (State Clearinghouse [SCH] #2020070582) for the Carmel Valley Manor Sewer Main Extension Project (original project). This addendum was prepared in accordance with the California Environmental Quality Act (CEQA) and the *CEQA Guidelines*. The Carmel Area Wastewater District (CAWD) was the lead agency for the adopted IS-MND and is the lead agency for the environmental review in this addendum.

This addendum addresses the environmental effects of proposed modifications to the original project. Section 15164 of the *CEQA Guidelines* requires an addendum under the following circumstances

- if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred (Section 15164[a])
- if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred (Section 15164[b])

An addendum must include a brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record (Section 15164[e]).

1.1 Background and Purpose of the IS-MND Addendum

The IS-MND for the original project was adopted by CAWD on September 24, 2020. The adopted IS-MND is further supported by an accompanying Mitigation Monitoring and Reporting Program (MMRP). Information and technical analyses from the adopted IS-MND are referenced throughout this addendum; the adopted IS-MND is available for review on CAWD's website.[1] In conjunction with approving the IS-MND, CAWD also approved the MMRP and approved the original project.

As approved, the original project would extend sewer service to the existing Carmel Valley Manor senior living facility in Carmel Valley, unincorporated Monterey County. This development is currently served by a failing septic system that is considered a health concern by the Monterey County Environmental Health Department. An additional function of the original project would be that previously developed parcels directly adjacent to the proposed pipeline alignment would have the opportunity and may be required to connect to the municipal sewer system, should their existing septic systems and/or leach fields fail or otherwise become unable to continue to operate. The original project would include the installation and operation of approximately 9,900 linear feet of 8-inch diameter polyvinyl chloride (PVC) gravity sewer main, approximately 900 linear feet of 6-inch diameter force main, concrete manholes, and a 250 gallon per minute wastewater pump station. From the proposed gravity-fed sewer, wastewater would be pumped by the proposed pump station into the proposed force main, discharging to the existing collection system at the west abutment of County Bridge Number 500 crossing over the Carmel River on Valley Greens Drive.

[1] https://www.cawd.org/files/0f03d4411/Final+Carmel+Valley+Sewer+Extension+ISMND_Aug2020.pdf

Wastewater would be conveyed through the existing collection system to the CAWD Water Pollution Control Plant, which has a design capacity of 4.0 million gallons per day (MGD), a permitted capacity of 3.0 MGD, and an average dry weather flow of 1.2 MGD.

Original Project

As approved, the original project consists of a linear pipeline alignment in the public right-of-way along portions of Valley Greens Drive and Carmel Valley Road. The project would extend the existing wastewater collection system from its current termination point on Valley Greens Drive to Carmel Valley Manor located at 8545 Carmel Valley Road. The original project alignment would begin at County Bridge Number 500, located approximately 360 feet west of Poplar Lane along Valley Greens Drive, continue northeast along Valley Greens Drive until the intersection with Carmel Valley Road, continue east along Carmel Valley Road, and terminate at the intersection of Carmel Valley Road and Carmel Valley Manor. The original project also encompasses a pump station site located on a 1,600-square foot portion of Assessor's Parcel Number 157-031-015-000, which is south of Valley Greens Drive in an undeveloped area across from Hole 14 and adjacent to Hole 13 of the Quail Lodge and Golf Club. The proposed pump station site would connect to the proposed pipeline alignment via incoming and outgoing pipelines.

Modified Project

The project applicant now proposes modifications to the original project, herein referred to the "modified project." This document is an addendum to the previously adopted IS-MND and has been prepared by CAWD to evaluate the potential environmental impacts of the proposed modified project. A detailed description of the modified project is provided in Section 2, *Project Description*.

1.2 Basis for the Addendum

When an IS-MND has been adopted and a project is modified or otherwise changed after adoption, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and Sections 15162 and 15164 of the *CEQA Guidelines*.

Section 15162(a) of the *CEQA Guidelines* provides that a Subsequent IS-MND is not required unless the following occurs:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

   (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Pursuant to Section 15164(b) of the *CEQA Guidelines,* an addendum to an adopted negative declaration may be prepared by the Lead Agency that prepared the original negative declaration if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 have occurred that require preparation of a Subsequent EIR or negative declaration. An addendum must include a brief explanation of the agency's decision not to prepare a Subsequent IS-MND and be supported by substantial evidence in the record as a whole (Section 15164[e]). The addendum to an adopted negative declaration need not be circulated for public review but it may be included in or attached to the adopted negative declaration (Section 15164[c]). The decision-making body must consider the addendum prior to making a decision on the project (Section 15164[d]).

An addendum to the adopted IS-MND for the original project is appropriate to address the modified project because the proposed modifications to the approved original project do not meet the conditions of Section 15162(a) for preparation of a Subsequent IS-MND. The modified project would not result in new or more severe impacts related to: 1) substantial changes to the original project which requires major revisions to the adopted IS-MND; 2) substantial changes to the circumstances under which the original project are being undertaken which will require major revisions to the adopted IS-MND; or 3) new information of substantial importance showing significant effects not previously examined.

The adopted IS-MND and this addendum to the adopted IS-MND serve as informational documents to inform decision-makers and the public of the potential environmental consequences of approving the proposed modified project. This addendum neither controls nor determines the ultimate decision for approval of the proposed modified project, described herein in Section 2, *Project Description*. The information presented in this addendum to the adopted IS-MND will be considered by CAWD alongside the adopted IS-MND prior to making a decision on the modified project.

2 Project Description

2.1 Modified Project Characteristics

Instead of continuing along Valley Greens Drive to the intersection of Carmel Valley Road and along Carmel Valley Road to Cypress Lane, the modified alignment would traverse east from Valley Green Drive approximately 800 feet south of Carmel Valley Road, through undeveloped open space, following planned roadways associated with the proposed Wolters development.[2] The modified alignment would continue east for approximately 800 feet to Williams Ranch Road, where it would pivot northeast toward Carmel Valley Road, through agricultural land. The portion of the pipeline alignment that would be constructed in open space and agricultural areas would involve open trenching, but would require a depth of 10 feet instead of a depth of 25 feet within existing roadways. The modified alignment would connect to Carmel Valley Road approximately 1,300 feet east of Valley Greens Drive. The modified project would include the installation and operation of approximately 9,025 linear feet of 8-inch diameter PVC gravity sewer main, 875 linear feet shorter than the previously analyzed alignment. Figure 1 shows the project's regional location and Figure 2 shows the modified alignment in comparison to the original alignment.

2.2 Retained Original Project Characteristics

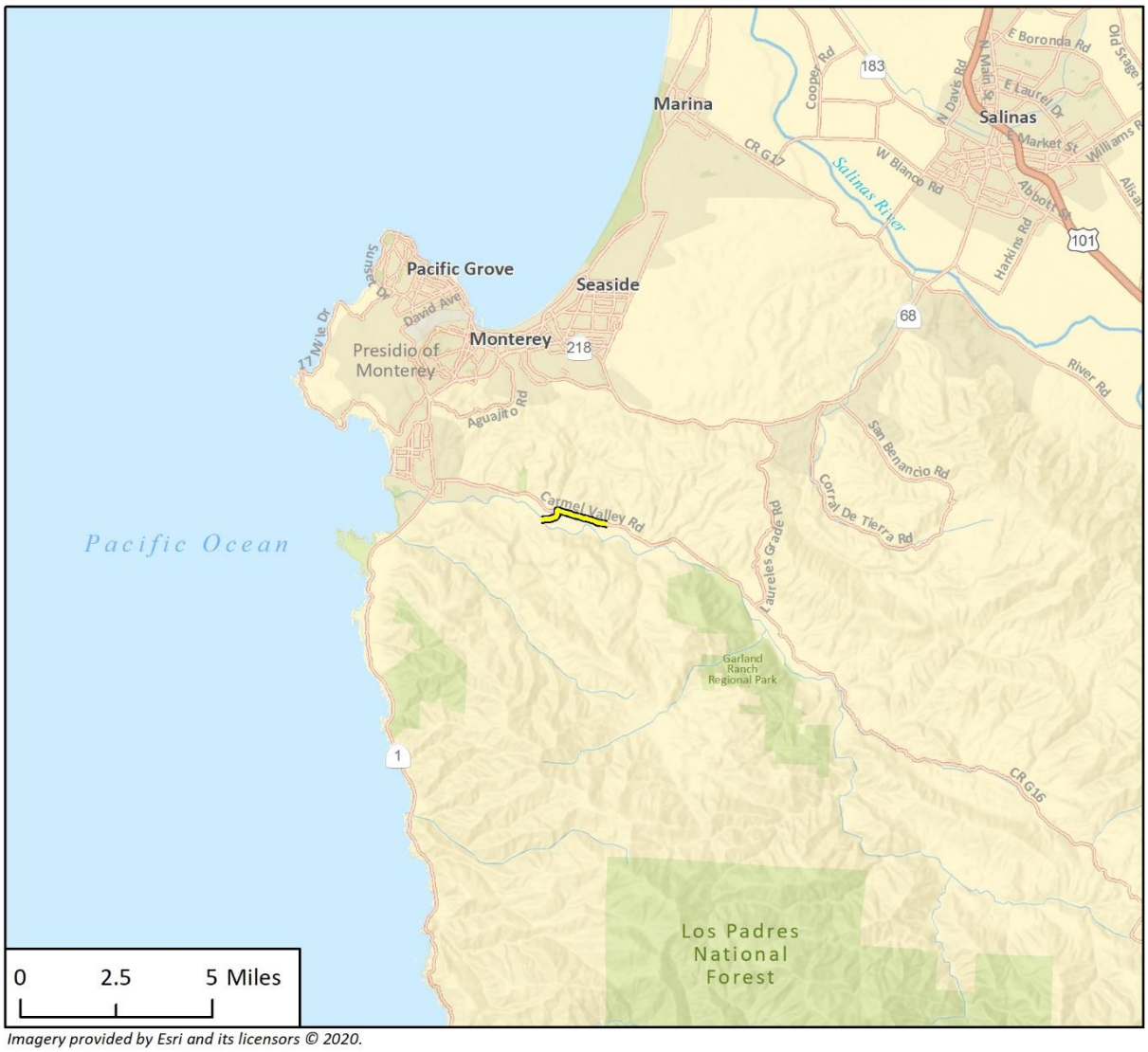
As with the original project, the modified project would extend sewer service to the existing Carmel Valley Manor senior living facility and may allow or require previously developed parcels directly adjacent to the proposed pipeline alignment to connect to the municipal sewer system. The modified project would involve installation of an 8-inch diameter PVC gravity sewer main, approximately 900 linear feet of 6-inch diameter force main, concrete manholes, and a 250 gallon per minute wastewater pump station. Just as under the original project, the modified project would involve pumping wastewater from the proposed gravity-fed sewer into the proposed force main via the proposed wastewater pump station, and discharging into the existing collection system at the west abutment of County Bridge Number 500 crossing over the Carmel River on Valley Greens Drive. Wastewater would be conveyed through the existing collection system to the CAWD Water Pollution Control Plant. The modified project would include the same equipment and improvements as the original project, including a back-up generator, electrical service, wet well, pipes, valves, pumps control unit, and surface improvements.

Construction

Construction of the modified project would occur over approximately six months, similar to the original project, and would be completed during workdays between 7:30 a.m. and 3:30 p.m. Construction occurring within existing roadways would involve open trenching at a depth of approximately 15 feet, and would complete approximately 100 feet of pipeline per day. Approximately six workers per day would be on site for construction of the pipeline, and four workers per day for construction of the pump station.

[2] This sewer extension project would be installed first; improvements associated with the Wolters development would be constructed later. The timing of construction is currently unknown.

Figure 1 Regional Location



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Project Location

N

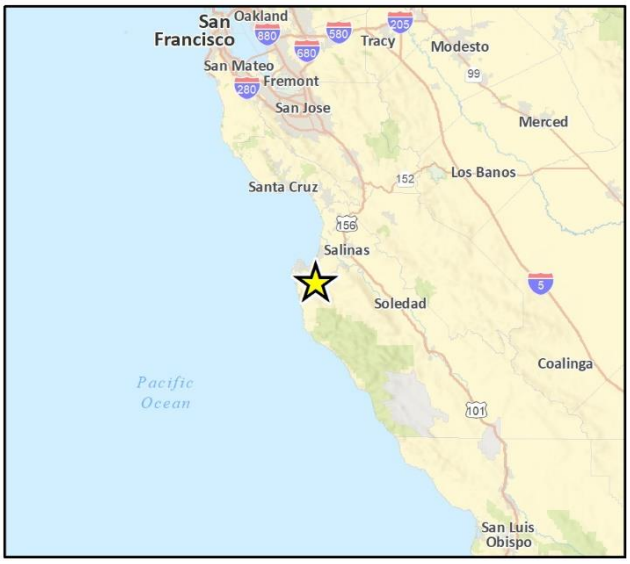
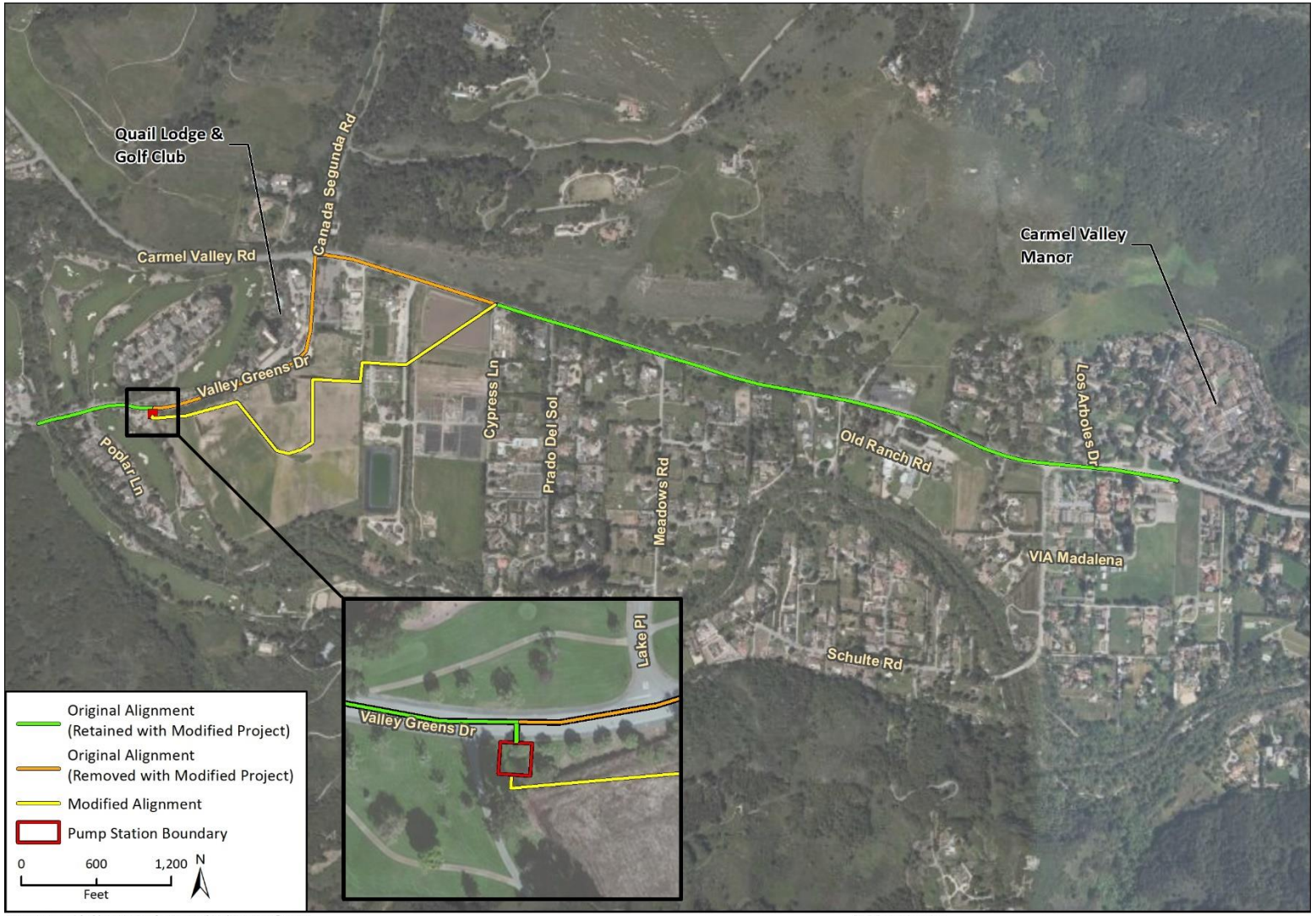


Figure 2 Project Site Location



The modified project would involve similar construction equipment as the original project, including the use of a backhoe, concrete/industrial saw, compactor, paving equipment, and skid steer loader. The modified project would not install pipeline at Valley Greens Drive and Carmel Valley Road, and jack and bore construction would no longer be required. Similar to the original project, the construction contractor would implement a County of Monterey-approved traffic control plan, which is anticipated to include a combination of public notification, steel plates, barricades, flagmen, and other traffic control devices. Closure of Carmel Valley Road is not anticipated to be required during construction, as traffic cones will be used to direct traffic into temporary lanes. Construction staging would occur in areas to be determined by the contractor, potentially including at Carmel Valley Manor or on site within public rights-of-way near active construction areas.

Maintenance

Similar to the original project, the pipeline would not require maintenance for the first few years after installation, after which maintenance would occur annually. The pump station would require maintenance once per month, and the emergency generator at the pump station would be tested once per month for approximately 30 minutes at a time.

Lead Agency Permits and Approvals

The following approvals would continue to be required from the County of Monterey:

- Encroachment Permit for Work in Public Right-of-Way, including a traffic control plan
- Building Permit
- Environmental Health Permit
- Erosion Control Plan per Monterey County Code (MCC) Chapter 16.12

Additionally, the State Water Resources Control Board would approve coverage under the National Pollutant Discharge Elimination System Construction General Permit, and the Monterey County Local Agency Formation Commission would approve annexation of the pipeline's service area into CAWD service boundaries.

The modified project would also require the following permits related to crossing the drainage/channelized ditch on the east side of Williams Ranch Road:

- U.S. Army Corps of Engineers Section 404 Permit
- Regional Water Quality Control Board 401 Certification Permit
- California Department of Fish and Wildlife 1602 Permit

3 Impact Analysis

As described under Section 1.2, *Basis for the Addendum*, when an IS-MND has been adopted and a project is modified or otherwise changed after adoption, additional CEQA review may be necessary. In accordance with the *CEQA Guidelines*, CAWD has determined that an addendum to the adopted IS-MND is the appropriate form of environmental review for the proposed project. This examination includes an analysis of the provisions of Section 21166 of CEQA and Sections 15162 to 15164 of the *CEQA Guidelines* and their applicability to the modified project.

As discussed in the impact analysis below, the modified project would not introduce new significant environmental impacts beyond those which have already been identified and characterized in the adopted IS-MND. None of the conditions described in *CEQA Guidelines* Section 15162 calling for preparation of a Subsequent IS-MND have occurred or would occur as a result of the modified project. This addendum will be considered by the CAWD decision-making body in making a decision on the proposed project.

Appendix G of the *CEQA Guidelines* provides a checklist of environmental issue areas that are suggested as the issue areas that should be assessed in CEQA analyses. The adopted IS-MND addressed in detail all 20 of the suggested environmental issue areas. To provide a thorough and conservative analysis of potential impacts associated with the project, this addendum also addresses all 20 environmental issue areas suggested by Appendix G of the *CEQA Guidelines*, as listed below.

1. Aesthetics
2. Agriculture and Forestry Resources
3. Air Quality
4. Biological Resources
5. Cultural Resources
6. Energy
7. Geology and Soils
8. Greenhouse Gas Emissions
9. Hazards and Hazardous Materials
10. Hydrology and Water Quality
11. Land Use and Planning
12. Mineral Resources
13. Noise
14. Population and Housing
15. Public Services
16. Recreation
17. Transportation
18. Tribal Cultural Resources
19. Utilities and Service Systems
20. Wildfire

The existing environmental conditions in the project site and its surroundings are substantially the same under present conditions as described in the adopted IS-MND. Potential environmental impacts of the proposed project are analyzed below to determine whether impacts are consistent with the impact analysis provided in the adopted IS-MND, and whether additional mitigation measures are required to minimize or avoid potential impacts.

Adopted IS-MND Analysis Summary

No impacts to agricultural and forestry resources, mineral resources, public services, or recreation were found in the adopted IS-MND. Additionally, impacts to aesthetics, air quality, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use

and planning, noise, population and housing, transportation, utilities and service systems, and wildfire were determined to be less than significant with no mitigation required.

The adopted IS-MND determined that impacts to biological resources, cultural and tribal cultural resources, and geology and soils could be reduced to less than significant levels with mitigation. Mitigation proposed in the adopted IS-MND included:

- Mitigation Measure BIO-1: Worker Environmental Awareness Program
- Mitigation Measure BIO-2: Western Bumble Bee Preconstruction Survey
- Mitigation Measure BIO-3: Spills/Debris Prevention
- Mitigation Measure BIO-4: Wildlife Entrapment Prevention
- Mitigation Measure BIO-5: Trash Disposal
- Mitigation Measure BIO-6: Nesting Bird Survey
- Mitigation Measure CR-1: Archaeological and Native American Monitoring
- Mitigation Measure CR-2: Unanticipated Archaeological Resources
- Mitigation Measure GEO-1: Paleontological Resources Monitoring

The adopted IS-MND determined that implementation of these mitigation measures would reduce impacts to less than significant levels. Therefore, the original project would not result in significant and unavoidable impacts.

Modified Project

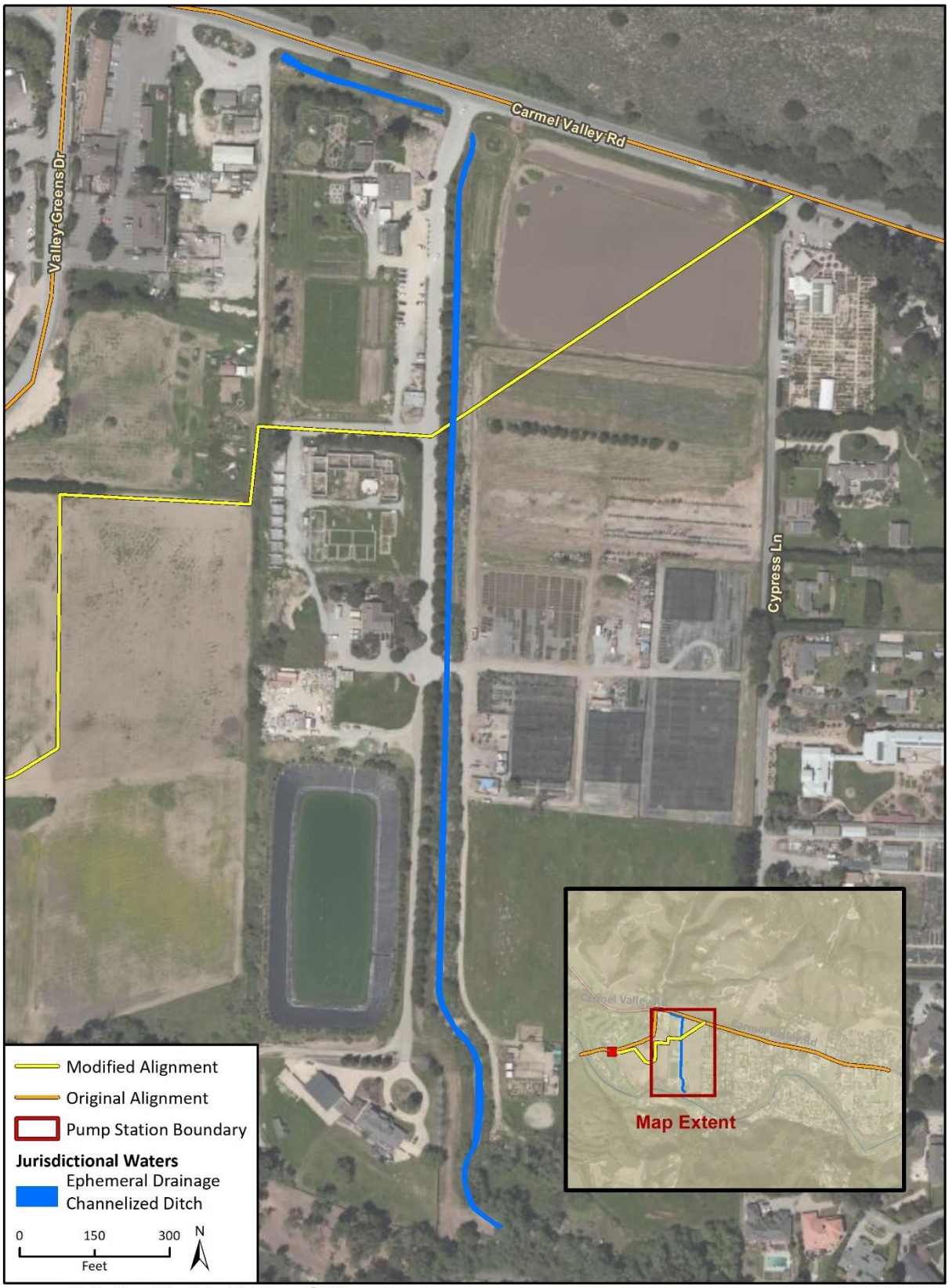
This discussion groups impact topics to allow a concise analysis of similar or related issue areas.

- **Aesthetics.** The modified alignment would be installed underground, as with the original project, and would not introduce new or substantially more severe impacts to public views, scenic resources, or the viewshed of a state scenic highway. Construction of the portion of the pipeline that would traverse open space and agricultural lands would impact the quality of public views of those lands; however, the pipeline would be underground during operation, and construction impacts would be temporary in nature. The modified project would not alter the proposed pump station location or design, the visual impacts of which were addressed in the adopted IS-MND. Further, the modified project would not introduce new sources of light or glare not anticipated in the adopted IS-MND. Thus, the modified project would not result in a new impact or a substantially more severe impact to aesthetics.
- **Agriculture and Forestry Resources.** The modified project would traverse the area bounded by Williams Ranch Road, Carmel Valley Road, and Cypress Lane, which is designated as Prime Farmland by the California Department of Conservation (DOC 2016). The remainder of the modified alignment is not located within Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance (DOC 2016). Construction of the pipeline within the agricultural land would result in the temporary disruption of existing agricultural uses; however, construction of the modified project would not result in the permanent conversion of farmland to non-agricultural use, as existing agricultural use would continue after construction is complete. Therefore, this impact is considered less than significant. Further, the modified pipeline alignment would not expand the project site into timberlands or forest lands. Therefore, the modified project would not result in a new impact or a substantially more severe impact to agricultural and forestry resources.

- **Air Quality, Greenhouse Gas Emissions, and Energy.** The modified project would excavate less area within existing roadways and more area within open spaces and agricultural areas. As described in Section 2.1, *Modified Project Characteristics,* excavation and trenching in open spaces would require a depth of approximately 10 feet, whereas excavation and trenching within existing roadways would require a depth of up to 25 feet. In addition, the modified project alignment would be approximately 875 linear feet shorter than the original alignment; therefore, less excavation would be required under the modified project, which would reduce air quality and greenhouse gas emissions impacts related to construction. Further, less excavation would involve less energy demand for modified project construction. Therefore, the modified project would not involve new or substantially greater emissions or energy demand than the original project. In operation, the modified project would not require more electricity or more frequent maintenance visits than the original project. Thus, the modified project would not result in a new impact or in a substantially more severe impact to air quality, greenhouse gas emissions, or energy.
- **Biological Resources.** Rincon conducted a reconnaissance-level site visit of the modified alignment and updated the literature review, including queries of the California Natural Diversity Database (California Department of Fish and Wildlife 2022), Inventory of Rare and Endangered Plants in California (CNPS 2022), Critical Habitat Portal (USFWS 2022a), and National Wetlands Inventory (USFWS 2022b). These queries did not reveal substantial changes in the locations of species occurrences or potential for special-status plants or sensitive natural communities to occur within the modified project area. The modified project would cross landscaped, developed, agricultural, and ruderal areas, consistent with the land cover types described in the original Biological Resources Assessment (BRA) (Rincon 2020) prepared for the project. The modified alignment would also cross open agricultural fields, however, that may provide marginal dispersal habitat for California red-legged frog (CRLF; *Rana draytonii*), a federally threatened species, given the proximity to known occupied habitat in the Carmel River. The agricultural fields also may provide habitat for western bumble bee (*Bombus occidentalis*), a candidate for State listing, and nesting birds. These species were previously addressed in the adopted IS-MND and original BRA. Due to the existing level of disturbance from agricultural use, the potential for these species to occur is relatively low and the modified project would not introduce any new impacts to special-status species or substantially increase the severity of potential impacts to special-status species. With modified pre-construction survey mitigation measures for western bumble bee and nesting birds, and the addition of a CRLF pre-construction survey, impacts would be less than significant.

  The modified project would cross an ephemeral drainage/channelized ditch on the east side of Williams Ranch Road, downstream of the portion of the ditch documented in the 2020 BRA along Carmel Valley Road (Figure 3). The ditch channels surface water from a steep canyon north of the Valley Greens Drive and Carmel Valley Road Intersection (USFWS 2022b), through culverts and channelized ditches, and eventually flows into the Carmel River. This ditch likely only flows during and immediately after rain events and does not contain riparian habitat; therefore, it does not provide suitable aquatic habitat for special-status species but is likely under U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife jurisdiction. Implementation of practices in Monterey County's Construction Site Best Management Practices (BMPs) Handbook and the Construction BMPs-Plan Sheet would reduce impacts related to surface runoff, dust control, and waste/material management (County of Monterey 2015b), limiting potential impacts to the drainage during construction. The modified project would also be required to comply with water quality

Figure 3 Jurisdictional Areas



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standards outlined in the National Pollutant Discharge Elimination System Municipal General Permit, which states the project must meet best management practice guidance series requirements to control the discharge of pollutants and eliminate non-stormwater discharges and prevent accidental leaks or accidental spills of hazardous materials. Additionally, because the modified alignment would result in trenching across the ditch, Mitigation Measure BIO-8 requires restoration of the drainage to its original condition following project construction activities. Therefore, the modified project would not result in permanent impacts or substantial adverse effects to the drainage but would require U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife permitting. Permits were not required from these agencies with the original project, as the culvert transporting water into the drainage was to be completely avoided by jack and bore construction techniques. Implementation of Mitigation Measures BIO-1 through BIO-6 as included in the adopted IS-MND, as well as additional Mitigation Measures BIO-7 and BIO-8, would reduce impacts to a less than significant level, similar to the original project. The modified project and original project would both result in less than significant impacts with mitigation, and all potential impacts of the modified project are similar to those of the original project as described in the adopted IS-MND. Therefore, the modified project would not result in a new impact or a substantially more severe impact to biological resources. New mitigation measures included in the modified project are described below under *Effects and Mitigation Measures*. A Subsequent IS-MND is not required as long as the project applicant does not decline to adopt the new mitigation measures.

- **Cultural and Tribal Cultural Resources.** The modified project would cover a section of undeveloped land in addition to the road rights of ways covered with the original alignment. Rincon conducted an archaeological survey an Extended Phase I testing of the modified alignment (Appendix A). This study concluded that the modified alignment would not results in new impacts to historical resources of the built environment or known archaeological resources. However, there are known buried archaeological sites in the project vicinity and the project site is sensitive for buried archaeological resources. Similar to the original project, construction activities included in the modified project have the potential to result in the destruction, damage, or loss of undiscovered archaeological resources. Mitigation Measure CR-1, Archaeological and Native American Monitoring, and CR-2, Unanticipated Archaeological Resources, from the adopted IS-MND would be implemented under the modified project, which would ensure that potential impacts to archaeological resources are less than significant. Therefore, the modified project would not result in a new impact or a substantially more severe impact to cultural resources. Construction of the modified project would be required to follow the State of California Health and Safety Code Section 7050.5 procedures following the unanticipated discovery of human remains, as described in the adopted IS-MND. Impacts to human remains would be less than significant. The mitigation measures identified in the adopted IS-MND would remain applicable to the modified project, and would ensure potential impacts to tribal cultural resources are less than significant. Therefore, the modified project would not result in a new impact or a substantially more severe impact to cultural or tribal cultural resources.
- **Geology and Soils.** The modified project would generally be subject to the same geologic conditions as the original alignment. The modified project alignment would not be located within a liquefaction zone (DOC 2020a) or a landslide zone (DOC 2020b). Because the modified project would not involve habitable structures or permanent on-site employees, impacts related to geology and soils would remain consistent with those described in the adopted IS-MND and

would not result in a new impact related to geologic or soil hazards. The modified project would disturb soils within open space and agricultural fields; however, required compliance with the National Pollutant Discharge Elimination System Construction General Permit would ensure construction does not cause substantial erosion, and the modified project would return the construction areas to their existing conditions following installation of the pipeline. As described in the adopted IS-MND, the required Stormwater Pollution Prevention Plan (as part of the Construction General Permit) would include best management practices for erosion control, such as preventing runoff from unprotected slopes, keeping disturbed areas to a minimum, and installing check berms and desilting basins during construction activities, as necessary.

Similar to the original project, construction activities included in the modified project have the potential to result in the destruction, damage, or loss of undiscovered paleontological resources. Mitigation Measure GEO-1, Paleontological Resources Monitoring, would be implemented under the modified project, which would ensure that potential impacts to paleontological resources are less than significant. Therefore, the modified project would not result in a new impact or a substantially more severe impact to geology and soils.

- **Hazards and Hazardous Materials.** The modified project would generally involve similar excavation and construction activities as the original project, but would involve a modified alignment through open space and agricultural lands. A review of hazardous material release information databases revealed that there are no active hazardous materials sites within 0.25 mile of the original project alignment, an area that includes the modified alignment (DTSC 2022; SWRCB 2022; CalEPA 2022a; CalEPA 2022b). Further, as outlined in the adopted IS-MND, the use, transport, and storage of hazardous materials during construction of the project would be subject to federal, state, and local laws and regulations governing hazardous materials. In operation, the modified project would not require the use, storage, or disposal of hazardous materials, as under the original project. Therefore, the modified project would not involve new or substantially more severe impacts related to hazards and hazardous materials.
- **Hydrology and Water Quality.** The modified project would involve a revised alignment that would partially traverse open space and agricultural areas, as opposed to remaining entirely within existing roadways like the original project. Increased construction and excavation in open space and agricultural areas, as opposed to within existing roadways, could result in impacts to erosion or existing drainage patterns. Compliance with existing policies and regulations as outlined in the adopted IS-MND would continue to ensure that impacts would be less than significant. Further, as described in the adopted IS-MND, components of the original project would be in a flood hazard area as designated by the Federal Emergency Management Agency (FEMA). The modified project alignment would traverse agricultural and open space east of the nearest flood zone and would not increase the amount of pipeline within a flood hazard area (FEMA 2022). As stated in the adopted IS-MND, any portion of the project alignment in a flood hazard zone would be subject to Monterey County Code regulations that would reduce the risk of release of pollutants to less than significant. Therefore, impacts related to hydrology and water quality would remain consistent with those described in the adopted IS-MND and would not result in a new impact. Thus, the modified project would not result in a new impact or a substantially more severe impact to hydrology and water quality.
- **Land Use and Planning.** The modified pipeline alignment would be located entirely below the ground surface. Therefore, the modified project would not have the potential to physically divide an established community. The modified project would not involve changes to existing land use or zoning designations, and would not conflict with land use plans, policies, or

regulations adopted to avoid or mitigate an environmental effect. Therefore, the modified project would not result in a new or substantially more severe land use impact.

- **Mineral Resources.** The modified project would not expand the project alignment into an area known to contain mineral resources or an area zoned for mineral resource extraction (United States Geological Survey 2022). Therefore, the modified project would not result in a new or substantially more severe impact to mineral resources.
- **Noise.** The modified project would involve shifting a portion of the pipeline alignment away from Valley Greens Drive and Carmel Valley Road into agricultural and open space areas. The modified alignment would not result in construction activities closer to sensitive receivers than as described in the adopted IS-MND. As with the original project, the pipeline under the modified project would be located entirely underground and would not result in operational noise or vibration and would not require additional maintenance trips. Accordingly, the modified project would not result in new or substantially more severe noise impacts.
- **Population and Housing, Public Services, Recreation, and Utilities and Service Systems.** The modified project would not increase the capacity of the pipeline and would not substantially increase the number of lots that could connect or could be required to connect to the municipal wastewater system. Therefore, there is not anticipated increase in population and housing, demand for public services, demand for recreational facilities, and demand for utilities beyond that analyzed in the adopted IS-MND. Thus, the modified project would not result in new or substantially more severe impacts to these resources.
- **Transportation.** The modified project would not require additional construction or operational vehicle trips beyond those estimated in the adopted IS-MND, and would similarly not result in changes to the surrounding circulation system. Further, the modified project would involve a revised alignment that would be partially located outside of the right-of-way of Valley Greens Drive and Carmel Valley Road, which would reduce the need for lane diversions or closures. A Traffic Control Plan would still be implemented under the modified project, pursuant to County of Monterey encroachment permit requirements. Accordingly, the modified project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, introduce transportation hazards, or result in inadequate emergency access. Therefore, the modified project would not result in new or substantially more severe impacts to transportation.
- **Wildfire.** Land north of Carmel Valley Road is within a State Responsibility Area, with some portions of land in a High Fire Hazard Severity Zone and some in a Very High Fire Hazard Severity Zone. Additionally, a few parcels located south of Carmel Valley Road and adjacent to the pipeline alignment are within a Very High Fire Hazard Severity Zone of a Local Responsibility Area. The modified project alignment would not be located in state responsibility areas or lands classified as very high fire hazard severity zones (CAL FIRE 2007). Further, as described in Section 20, *Wildfire,* of the adopted IS-MND, implementation of required construction measures and regular maintenance would ensure that the project would exacerbate existing fire risk. The same measures would be implemented under the modified project. Therefore, the modified project would not result in new or substantially more severe impacts in terms of wildfire.

Effects and Mitigation Measures

As described above, it has been determined that the proposed project is consistent with the analysis of the adopted IS-MND and would not result in new or substantially more severe impacts beyond

those identified in the adopted IS-MND. Mitigation measures identified in the adopted IS-MND would remain applicable to the modified project. Mitigation Measure BIO-2 has been slightly modified compared to the adopted IS-MND. Modifications to the adopted IS-MND mitigation measures are shown below; text that is underlined denotes text that has been added and text that is in ~~strikeout~~ denotes text that has been removed compared to the original mitigation measure. Two additional mitigation measures (BIO-7 and BIO-8) are also included below, and would be required with the modified project. The mitigation measures included in the adopted IS-MND, including BIO-2 revised below, and new mitigation measures included herein would ensure the modified project results in less than significant impacts with mitigation. This finding is consistent with the adopted IS-MND and does not constitute a new impact or substantial increase in severity to a previously identified impact. Additionally, the proposed project is consistent with the findings and conclusions of the IS-MND regarding mandatory findings of significance.

Modifications to Adopted IS-MND Mitigation Measures

BIO-2 Western Bumble Bee Preconstruction Survey

A qualified biologist(s) shall conduct a pre-construction survey prior to the onset of work activities at the pump station site and modified alignment within open space and agricultural areas. The pre-construction survey effort shall be conducted for a minimum of one hour. If bumble bees of any species are observed, they shall be photographed for identification following the USFWS guidance in Appendix A Standardized Bee Photography in the Survey Protocols for the Rusty Patched Bumble Bee (*Bombus affinis*) (USFWS 2019d). If construction begins between March 1st and November 1st, the ground shall also be searched during the survey for active bumble bee colonies. No capture or handling of bumble bees shall be conducted, and western bumble bee shall be avoided. Foraging bees shall be allowed to leave work areas undisturbed, and bee colonies shall be avoided during the active season from March 1 through November 1.

New Mitigation Measures

BIO-7 California Red-legged Frog Avoidance and Minimization

A qualified biologist shall conduct a survey of the modified alignment for California red-legged frog (CRLF) within 48 hours of initial ground disturbing activities. The survey area shall include the proposed disturbance area and all proposed ingress/egress routes, plus a 100-foot survey buffer. If any life stage CRLF is found within the survey area, the individual shall be avoided and allowed to leave the site of its own volition. The biologist shall revisit the site on subsequent days to confirm the CRLF has left the site. If the CRLF has not left the site after three days, USFWS and the California Department of Fish and Wildlife shall be consulted to determine the appropriate course of action.

During construction, avoidance measures shall include:

- A qualified biologist shall be present on-site until all construction activities are complete within the farm field. If any life stage of CRLF is found, work shall cease within 100 feet of the CRLF and the USFWS and California Department of Fish and Wildlife shall be contacted immediately to determine the appropriate course of action.
- All development activities occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31 to avoid impacts to CRLF.

- If construction must occur between November 1 and March 31, the qualified biologist shall conduct a pre-activity clearance sweep within 48 hours prior to start of project activities after any rain events of 0.1 inch or greater or if wet conditions are present on-site.
- The number of access routes, size of staging areas, excavation areas, and the total area of activity shall be limited to the minimum necessary.
- During project activities, all trash that may attract predators shall be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris shall be removed from work areas.
- If any life stage of the CRLF is found and these individuals are likely to be killed or injured by work activities, all work activities that could pose a risk of take to the individual shall stop until the individual has left the site. No individuals shall be relocated without USFWS authorization.
- All sightings of CRLF shall be reported to the California Natural Diversity Database.

BIO-8 Drainage Mitigation

Temporary Impacts to the drainage shall be mitigated at a minimum ratio of 1:1 (acres of habitat restored to acres impacted). Upon final design, a CAWD-approved biologist shall determine the final impacts to wetlands and the subsequent amount of acreage needed for restoration for the project. Restoration shall occur on the project, and the site shall be fully restored to pre-project conditions. Restoration shall include replanting through hydroseeding with native plants.

4 Conclusion

As discussed in Section 3, *Impact Analysis*, there are no new or substantially more severe impacts associated with the modified project than those identified and mitigated for in the adopted IS-MND. Mitigation measures included in the adopted IS-MND, as well as new mitigation measures introduced in this addendum, are required to be implemented as part of the modified project. Further, the proposed project modifications would not result in a new significant environmental effect, or a substantial increase in the severity of previously identified effects, as the existing, modified, and additional mitigation measures would ensure all impacts are less than significant. This conclusion is consistent with the conclusions of the adopted IS-MND. Therefore, a Subsequent IS-MND is not necessary because no new impacts or impacts of substantially greater severity than previously described would occur as a result of the modified project. Therefore, the following determinations have been made:

- No further evaluation of environmental impacts is required for the modified project;
- No Subsequent IS-MND is necessary per *CEQA Guidelines* Section 15162; and
- This addendum is the appropriate level of environmental analysis and documentation for the proposed project in accordance with *CEQA Guidelines* Section 15164.

Pursuant to *CEQA Guidelines* Section 15164(c), this addendum will be included in the public record for the adopted IS-MND. Documents related to this addendum will be available on CAWD's website at https://www.cawd.org/ceqa-notices.

5 References and Preparers

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List of Preparers

This addendum was prepared by Rincon Consultants, Inc. under contract to MNS Engineers, Inc. Persons and firms involved in data gathering, analysis, project management, and quality control include:

RINCON CONSULTANTS, INC.

Megan Jones, MPP, Principal
Aileen Mahoney, Senior Environmental Planner
Kayleigh Limbach, Environmental Planner
Theadora Fuerstenburg, Senior Archaeologist
Samantha Kehr, Senior Biologist
Isabelle Radis, GIS Analyst

Appendix A

Archaeological Survey and XPI Results for Modified Project

CONFIDENTIAL APPENDIX

**To protect sensitive information about the location and nature of cultural resources, this appendix is not included in the public draft of this document.