DRAFT Mitigated Negative Declaration

Eucalyptus Pruning

Carmel Area Wastewater District Wastewater Treatment Plant

January 2020

Carmel Area Wastewater District
3945 Rio Road
P.O. Box 221428
Carmel, CA. 93922

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Section 1: Introduction

1.1 Introduction

This Mitigated Negative Declaration (MND) has been prepared in accord with the provisions of the California Environmental Quality Act (CEQA) and assesses the potential environmental impacts of the proposed Project. The proposed Project includes pruning of approximately ninety (90) existing Eucalyptus Trees at the Carmel Area Wastewater District Wastewater Treatment Plant.

1. Project title:	Eucalyptus Pruning
2. Lead agency name and address:	Carmel Area Wastewater District (CAWD) 3945 Rio Road Carmel, CA 93922
3. Contact person and phone number:	Barbara Buikema General Manager 831-624-1248
4. Project location:	Monterey County
5. Project sponsor name and address:	Carmel Area Wastewater District (CAWD) 3945 Rio Road Carmel, CA 93922
6. General plan designation:	Coastal Zone
7. Zoning:	Public Quasi Public (PQP)
8. Other Agency Approvals Required:	Coastal Commission, CA Dept of Fish and Wildlife

Section 2: General Description and Location

2.1 General Description

Carmel Area Wastewater District (CAWD) proposes to prune existing eucalyptus trees at the CAWD Wastewater Treatment Plant (WWTP). The pruning is being done to control the growth of the trees and to mitigate falling branches. The existing eucalyptus trees have the potential to fall or drop debris which could damage existing wastewater treatment plant infrastructure. Where eucalyptus trees are spreading new seedlings, new eucalyptus trees would be removed as part of the work to avoid propagation of this non-native species.

There are a total of approximately ninety (90) full grown eucalyptus trees surrounding the WWTP. The majority of the trees, approximately sixty-four (64), exist along the Southern property line. Less eucalyptus, approximately twenty-five (25), exist on the Westerly side of the Northern property line. Other than the eucalyptus, the Northern property contains mostly cottonwood trees which provide a large part of the visual screen on the North side. There is one eucalyptus on the East property line that would be completely removed, and there are no eucalyptus on the West property line.

The existing eucalyptus trees were planted during the 1980's to create a visual screen around the existing wastewater treatment plant. Many of the existing trees have grown to be much higher than they need to be to screen the existing facility. Existing eucalyptus trees around the WWTP range from about 75 feet to 90 feet tall. CAWD proposes to prune the trees to 42 feet tall along the Southern boundary of the WWTP, and 52 feet tall along the westerly side of the Northern property line.

Potential impacts to nesting birds will be mitigated by conducting bird surveys and not pruning trees with nests. Work will be timed to avoid the breeding and nesting seasons (after September 16 and before January 31).

A certified arborist and a wildlife biologist specialized in birds were commissioned to review the eucalyptus trees and provide recommendations which inform this mitigated negative declaration. The respective arborist and bird survey reports are included in this mitigated negative declaration in the appendices.

2.2 Project Location

The general location of the Project is shown in Figure 1: Project Vicinity Map. The WWTP is located South of the Carmel River, as shown in Figure 2. The closest residences to the WWTP are across the river on the northeast side, approximately 100 yards from the closest process structure on the plant site. Directly north of the WWTP site, across the river, is the Larsen

Youth Baseball field, approximately 200 yards away. The Carmel Elementary School is over 0.3 miles northwest of the WWTP site. The other sides of the WWTP site are bounded by undeveloped land. The west boundary of the plant site is slightly more than 800 yards from the Pacific Ocean and Highway 1 is approximately 600 yards to the east and south of the WWTP site.

The existing facilities located on the WWTP site are typical industrial facilities that are found on a site of a publicly owned wastewater treatment plant. The WWTP site is categorized as Public/Quasi-Public in the Monterey County Land Use Plan.

Figure 1: Project Vicinity Map

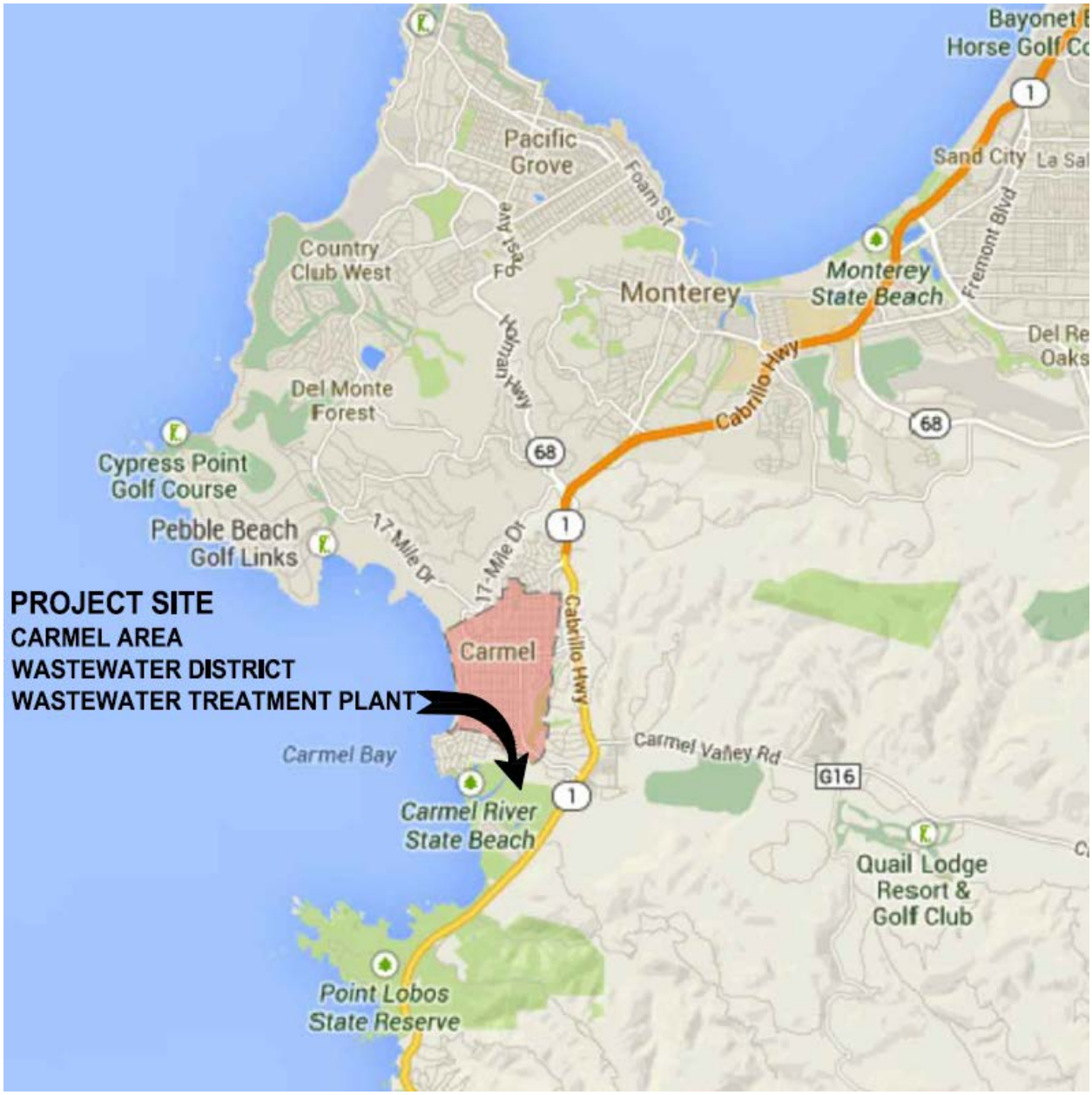


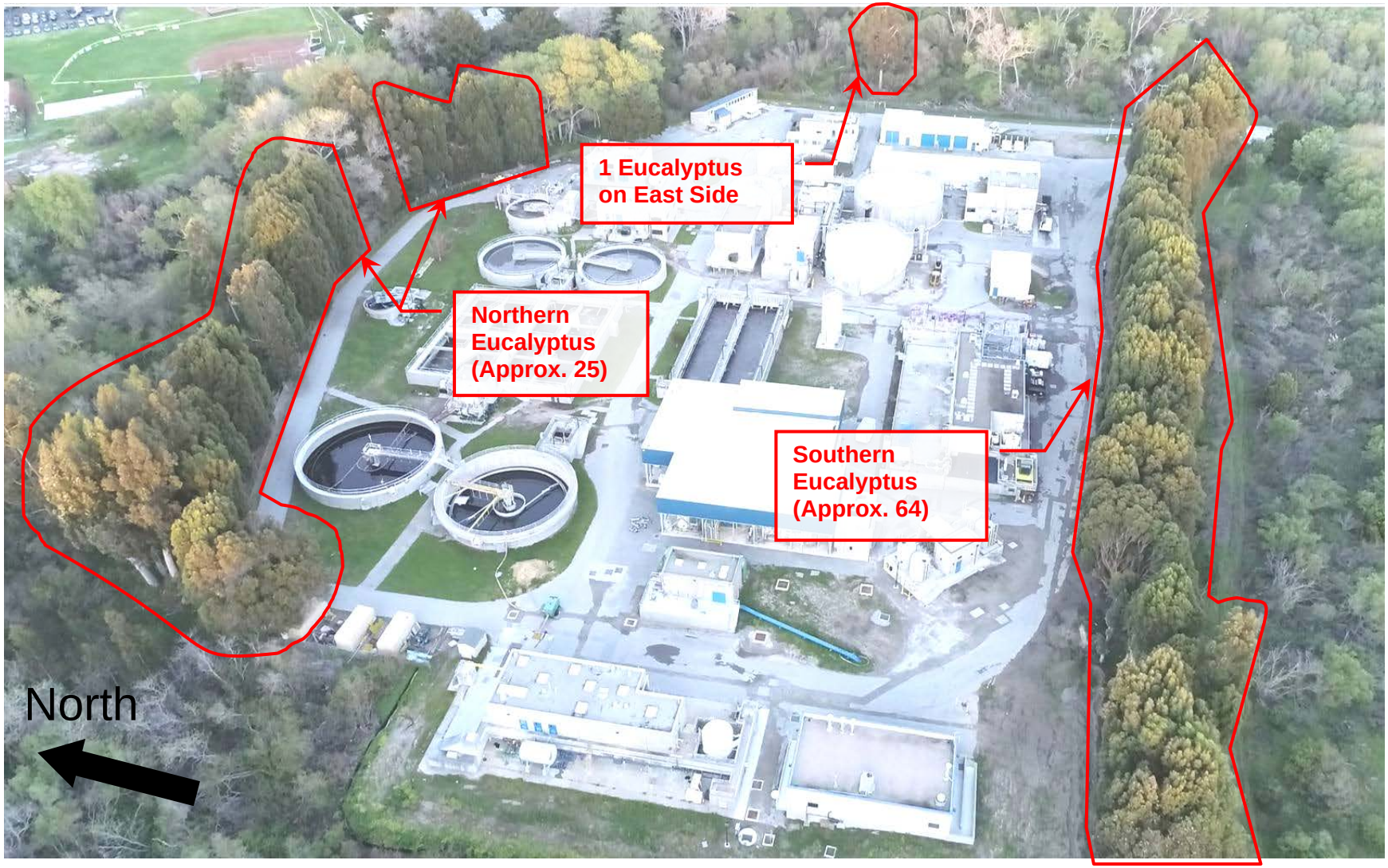
Figure 2: Project Location

Address: 26900 State Route 1, Carmel, CA 93923

2.3 Description of Existing Trees

Figure 3 is an aerial photograph of the WWTP that shows the eucalyptus trees around the perimeter of the property that are proposed to be pruned. Figures 4, 5 and 6 show photos of the eucalyptus trees viewed from inside the WWTP property and also viewed from outside of the property.

Figure 3: Aerial Photo



2.3.1 Southern Property Line

The majority (about 64) of the trees are along the Southern property line as seen in Figure 3.

Figure 4: Photos of Existing Eucalyptus Trees Along Southern Property Line

Photo 1: Taken from on top of an existing building inside the WWTP looking Southeasterly at southern property line.

Photo 2: Taken from on top of an existing building inside the WWTP looking Southwesterly at southern property line.

Photo 3: Taken from Hwy 1 Looking North West at the WWTP.

Photo 4: Taken from Hwy 1 Looking North West at the WWTP.

Photo 5: Taken from Hillside South of Carmel Lagoon looking North at the WWTP.

Photo 6: Taken from Ribera Rd. Looking North at the WWTP

2.3.2 Northern Property Line

About 25 eucalyptus trees exist along the northern property line. There is also a significant contingent of cottonwood trees on the Northern property line which provide part of the visual screen. The eucalyptus trees on the North side of the WWTP are less dominant than on the South side of the WWTP. Most of them are located on the Northwest side of the plant. The Northeast side of the plant does not have any eucalyptus trees.

Figure 5: Photos of Existing Eucalyptus Trees Along Northern Property Line

Photo 7: Taken from on top of an existing building inside the WWTP looking Northwesterly at Northern property line.

Photo 8: Taken from on top of an existing building inside the WWTP looking North at Northern property line. Note gap in eucalyptus filled in with cottonwood trees.

Photo 9: Taken from on top of an existing building inside the WWTP looking Northeasterly at Northern property line (No Eucalyptus). Note that buildings can be seen in the distance through gaps in the existing cottonwood trees.

Photo 10: Taken from Rio Rd at Santa Lucia Ave Looking South at the WWTP.

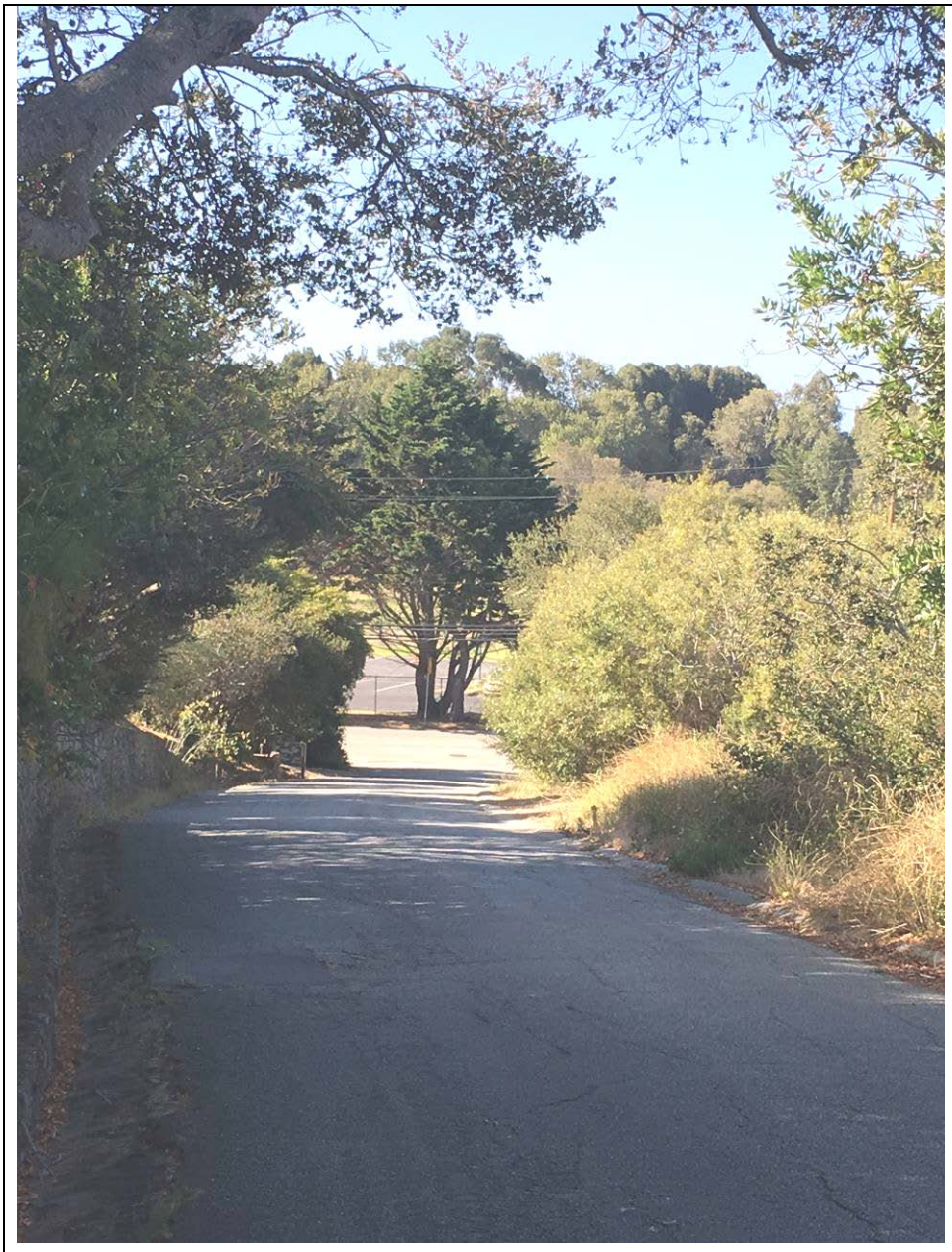


Photo 11: Taken from Ladera Dr Looking Southwest at the WWTP.

Photo 12: Taken from end of Atherton Pl Looking Southwest at the WWTP.

Photo 13: Taken from Atherton Dr Looking Southwest at the WWTP.

2.3.3 Eastern Property Line

There is one eucalyptus tree just East of the WWTP that would be removed as part of the project as it does not provide any visual screening. There is no development East of the WWTP that is at a high enough elevation to see the WWTP.

Figure 6: Photo of Existing Eucalyptus Tree at Eastern Property Line

Photo 14: Taken from on top of an existing building inside the WWTP looking northeast at eastern property line. One eucalyptus tree is seen on East property line would be removed. Note that buildings can be seen in the distance through gaps in the existing trees.

2.3.4 Line of Sight Analysis

Based on a line of site analysis, there would be no significant change to the visual aesthetic of the WWTP associated with trimming the eucalyptus trees to no shorter than 42 feet tall along the Southern property line and 52 feet tall along the Northern property line. Ground survey data at the WWTP and the surrounding neighborhoods was used to develop site line scenarios (See Figure 7 and 8). These figures illustrate the continued visual screening provided by shorter eucalyptus trees. The existing cottonwoods on the North and Northeast property line will not be modified and there are currently gaps in those trees that allow “peekaboo” views of the treatment plant from offsite (as seen in Photo 9, 12, and 14).

Figure 7: Line of Sight Analysis – From South of WWTP

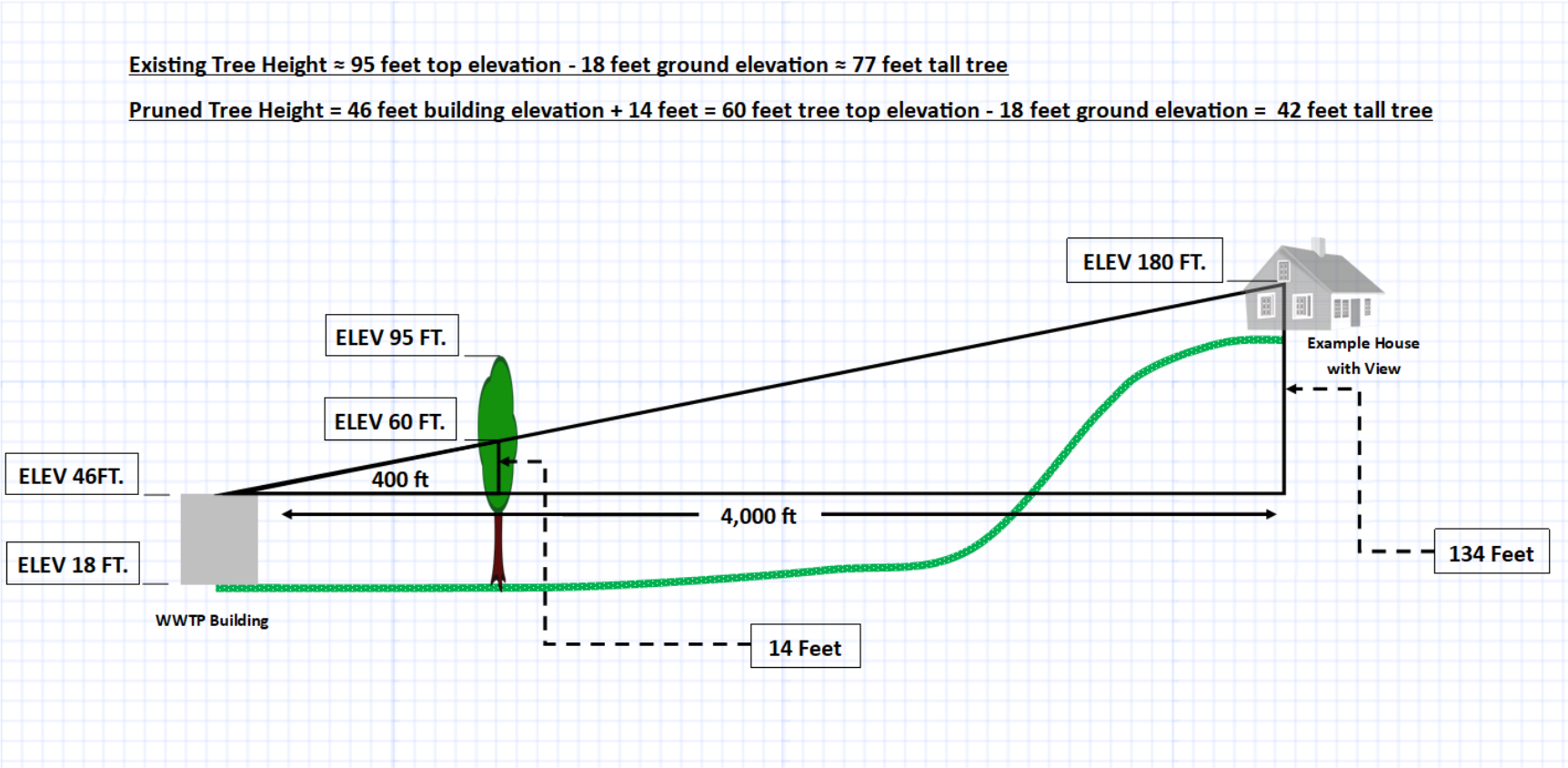


Figure 7 illustrates the site line analysis looking from the South. A tree height of 42 feet is considered adequate to screen the WWTP from residences with a view from the South of the treatment plant.

Figure 8: Line of Sight Analysis – From North of WWTP

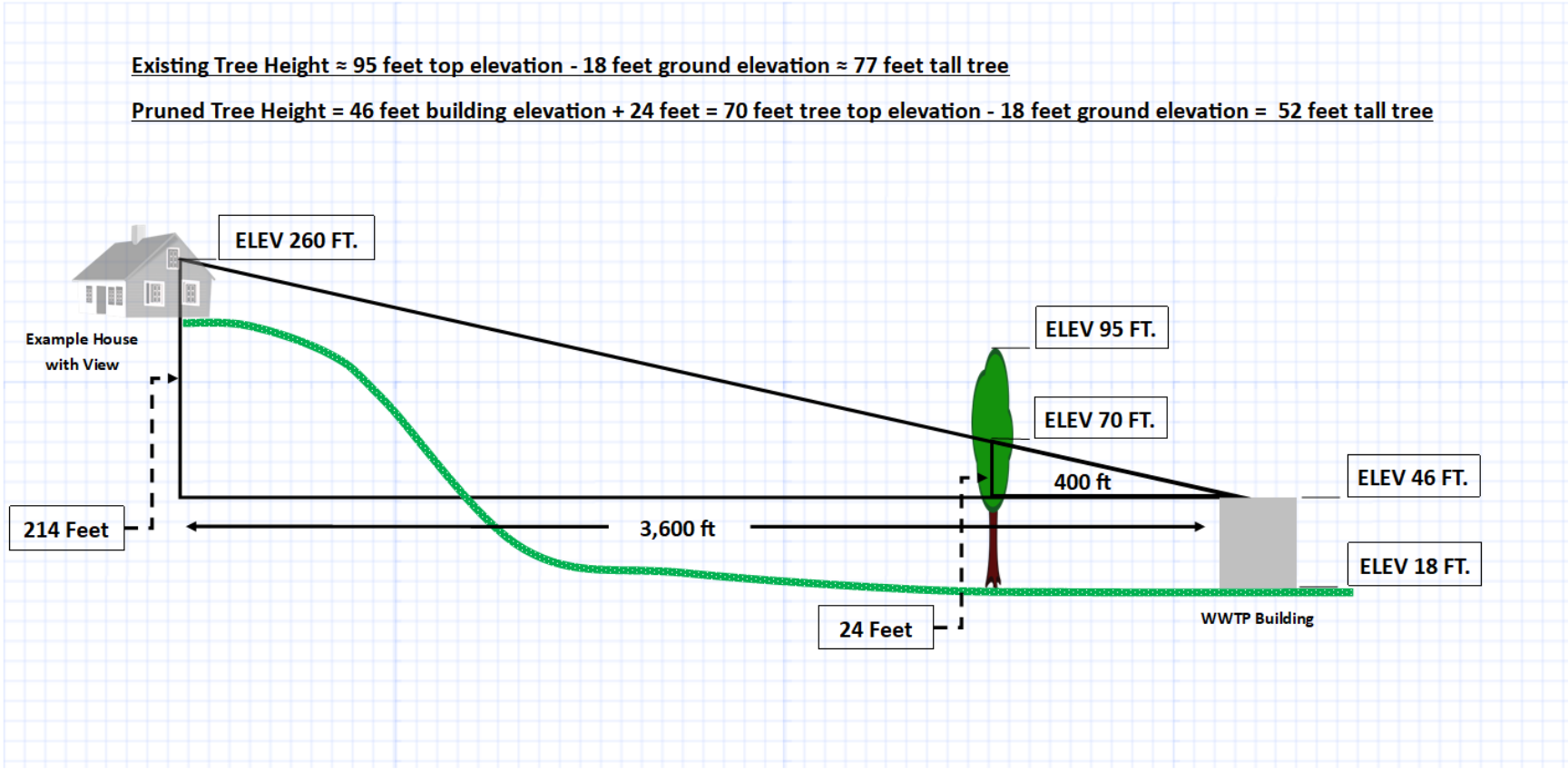


Figure 8 illustrates the site line analysis looking from the North. A tree height of 52 feet is considered adequate to screen the WWTP from residences with a view from the North of the treatment plant. A significant portion of the North side of the treatment plant is screened by cottonwood trees and these trees will not be modified. There are no eucalyptus trees on the Northeast and East boundaries of the WWTP and there are existing "peekaboo" views of the WWTP through these areas (see Photos 9, 12, and 14).

Section 3: Determination

3.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially significantly affected by this Project as indicated by the checklist on the following pages.

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

3.2 Determination by Lead Agency

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

Signature	Date
Title	For

Section 4: Evaluation of Environmental Impacts

The Carmel Area Wastewater District, as the CEQA Lead Agency, has prepared this initial study to identify potentially significant effects of the project and revisions to the project that would avoid or mitigate the effects to a point where clearly no significant effects would occur. This document includes a checklist for each resource topic, supporting explanations, and a discussion of mitigation measures that have been incorporated into the proposed project.

The resource topics considered in this Initial Study include:

- Aesthetics
- Agricultural 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 and Traffic
- Utilities and Service Systems

4.1 Aesthetics

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

The existing visual aesthetic of the WWTP would not be significantly altered because trees are being kept in place and pruning will be limited to upper portions of trees. By keeping tree heights of 42 feet along the South of the WWTP, and 52 feet along the North of the WWTP, the WWTP site will not be significantly exposed to surrounding views. See Figures 7 & 8.

Mitigation Measures. No mitigation measures are necessary for aesthetic resources other than minimizing the tree trimming to a tree height of 42 ft along the South property line and 52 ft along the North property line.

4.2 Agricultural and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
	☐	☐	☐	☒

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

The site is not used for any agricultural resources.

Mitigation Measures. No mitigation measures are necessary for agricultural resources.

4.3 Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct	☐	☐	☐	☒

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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 tree trimming activity does not have the potential to significantly effect air quality.

Mitigation Measures. No mitigation measures are necessary for air quality.

4.4 Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US 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	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

A bird survey will be conducted just prior to commencing the work to determine whether any birds are nesting in the eucalyptus trees prior to pruning activities.

▪ If it is determined that nests of raptors or other migratory bird are not present at the site, no mitigation is required.

▪ If active nests are discovered in a tree, no pruning activities will take place in that tree.

▪ Work will be timed to avoid the breeding and nesting seasons (after September 16 and before January 31).

To avoid impacts to riparian or fish species heavy equipment used for trimming work will be kept within the fence line of the developed wastewater treatment plant. This will avoid any possible impacts to the bank of the Carmel River during work on the eucalyptus on the North side of the treatment plant.

Mitigation Measures.

- Perform bird survey by a qualified biologist prior to work and do not trim trees where bird nests are present. Time work to avoid the breeding and nesting seasons (after September 16 and before January 31).
- Keep heavy equipment inside the developed area of the wastewater treatment plant.

4.5 Cultural Resources

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

The eucalyptus trees are not a historical resource. There would not be any digging involved in the work, so there is no potential for impacts to buried archaeological resources.

Mitigation Measures. No mitigation measures are necessary for cultural resources.

4.6 Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 pruning work would not change the existing soil conditions. One of the reasons for tree trimming is to mitigate risk of loss, injury or death involving falling debris from existing trees.

Mitigation Measures. No mitigation measures are necessary for geology and soils resources.

4.7 Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☐	☐	☐	☒

The tree trimming activities does not have the potential to significantly effect greenhouse gas emissions.

Mitigation Measures. No mitigation measures are necessary for greenhouse gasses.

4.8 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
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 one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
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 within the vicinity of a	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
private airstrip, would the project result in a safety hazard for people residing or working in the project area?				
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?	☐	☐	☐	☒

There would not be an increased hazard associated with hazardous materials. The existing eucalyptus trees have the potential to fall or drop debris which could damage existing wastewater treatment plant infrastructure.

Mitigation Measures. No mitigation measures are necessary for hazards or hazardous materials.

4.9 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Tree pruning would not cause any impacts to hydrology and or water quality.

Mitigation Measures. No mitigation measures are necessary for hydrology and water quality.

4.10 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
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 any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Tree pruning would not conflict with existing land use regulations. A tree trimming permit will be obtained from the County of Monterey.

Mitigation Measures. No mitigation measures are necessary for land use and planning.

4.11 Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

There are no known mineral resources in the project area.

Mitigation Measures. No mitigation measures are necessary for mineral resources.

4.12 Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 ground-borne vibration or ground-borne noise levels?	☐	☐	☐	☒
c) A substantial permanent increase in ambient noise levels in the project	☐	☐	☐	☒

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
vicinity above levels existing without the project				
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above level, existing without the project	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Noise from tree trimming chainsaw noise would be temporary and would only occur between 7 AM and 5 PM.

Mitigation Measures. No mitigation measures are necessary for noise.

4.13 Population and Housing

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The work would have no impact on population. There is no housing on the Plant site, and the project does not involve housing.

Mitigation Measures. No mitigation measures are necessary for population and housing.

4.14 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, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

The project would have no impact on public services.

Mitigation Measures. No mitigation measures are necessary for public services.

4.15 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?	☐	☐	☐	☒

The WWTP site is not used for public, or private recreation, hence the project has no impact on recreation.

Mitigation Measures. No mitigation measures are necessary for recreation.

4.16 Transportation/Traffic

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 uses (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 decrease the performance or safety of such facilities?	☐	☐	☐	☒

There would be no long term increase in traffic.

Mitigation Measures. No mitigation measures are necessary for transportation or traffic.

4.17 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 projects projected demand in addition to the providers existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

The project would not effect existing utilities or services.

Mitigation Measures. No mitigation measures are necessary for utilities and service systems.

Section 5: Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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)?	☐	☐	☐	☒
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

The project consists of trimming existing eucalyptus trees around the existing WWTP. The project would help keep eucalyptus trees from spreading and would mitigate risk associated with falling debris from trees, fire spread, and falling trees.

The project would not have significant environmental impacts during the work given the mitigations to avoid impacts to nesting birds and riparian habitat.

Once work is completed, the project could not have a significant impact on the environment. A Mitigated Negative Declaration will be prepared for the project to account for the mitigations to avoid impacts to nesting birds.

Appendix A
Arborist Report
Eucalyptus Pruning and Management Guidelines

Frank Ono

International Society of Arboriculture
Certified Arborist # 536
Professional Member Society of American Foresters 48004
1213 Miles Avenue
Pacific Grove CA, 93950
Telephone (831) 373-7086
Cellular (831) 594-2291

October 14, 2019

Mr. Patrick Treanor
Carmel Area Wastewater District
26900 Highway 1
Carmel, CA 93923

RE: Wastewater Treatment Plant – Eucalyptus Pruning and Management Guidelines
APN: 009-521-004-000

Mr. Treanor;

You recently contacted me to assess Eucalyptus trees owned on a property located at 26900 Highway 1, Carmel, CA 93923. The purpose for the assessment is to determine the condition of the trees with respect to health, safety, and make recommendations for pruning allowances. A visual inspection of the trees was conducted on October 11, 2019 for the trees adjacent to the property area resulting in some trees identified as being hazardous with most in need of desired pruning. The following report discusses my findings was well as recommendations for the property.

Sincerely,

Frank Ono
Certified Arborist #536

Wastewater Treatment Plant
Eucalyptus Pruning and Management Guidelines

ASSIGNMENT/SCOPE OF WORK

I was requested to evaluate two rows of Eucalyptus trees bordering the Carmel Area Wastewater District's Treatment Plant, located at 26900 Highway 1, Carmel, CA 93923. The assignment's purpose is to determine tree health, their structural condition, and treatments to manage risk for limb failure. From the findings of the evaluation, a report will be created making recommendations for treatments to reduce risk to an acceptable level.

LIMITATIONS OF THE ASSIGNMENT

The findings of this report are limited to a visual assessment of the trees. No further tests such as a complete root collar examination or climbing of the tree were made as part of the assessment diagnosis as these were neither requested nor considered necessary.

Disclosure Statement

It is important to note that Urban Foresters/Arborists are tree specialists who use their education, knowledge training and experience to examine trees, recommend measures to enhance their health and beauty and to attempt to reduce the risk of living near trees. Clients may choose to accept or disregard the recommendations of the arborist or to seek additional advice. Trees and other plant life are living, changing organisms affected by innumerable factors beyond our control. Trees fail in ways and because of conditions we do not fully understand. Urban Foresters/Arborists cannot detect or anticipate every condition or event that could possibly lead to the structural failure of a tree. Conditions are often hidden within the trees and below ground. Urban Foresters/Arborists cannot guarantee that a tree will be healthy or safe under all circumstances, for any specific period or when a tree or its parts may fail. Further, remedial treatments, as with any treatment or therapy, cannot be guaranteed. Treatment, pruning, bracing and removal of trees may involve considerations beyond the scope of the arborists skills and usual services such as the boundaries of properties, property ownership, site lines, neighbor disputes and agreements and other issues. Therefore, urban forester/arborists cannot consider such issues unless complete and accurate information is disclosed in a timely fashion. Then, the urban forester/arborist can be expected, reasonably, to rely upon the completeness and accuracy of the information provided. Trees can be managed but not controlled. To live near trees, regardless of their condition, is to accept some degree of risk. The only way to eliminate all risk associated with trees is to eliminate all trees.

Hazard/hazard potential: For the purposes of this evaluation and/report, a tree or tree part that presents a threat to humans, livestock, vehicles, structures, landscape features or other entity of civilization from uprooting, falling, breaking or growth development (e.g., roots). While all large landscape trees in proximity to such targets present some degree of hazard regardless of their condition, such inherent hazard is not intended as within this definition and its usage in this evaluation and report.

Inspection limitations: The inspection of these trees consisted solely of a visual inspection from the ground. While more thorough techniques are available for inspection and evaluation, they were neither requested nor considered necessary or appropriate at this time.

As trees and other plant life are living, changing organisms affected by innumerable factors beyond our control, Frank Ono (dba F. O. Consulting) and its personnel offer no guarantees, stated or implied, as to tree, plant or general landscape safety, health, condition or improvement, beyond that specifically stated in writing in accepted contracts. This report is based on a visual inspection of tree condition and for obvious defects. It is not intended to constitute a complete health and hazard evaluation. Further investigation would be required to more definitively evaluate the health and hazards posed by the subject trees, some of which may not be disclosed by visual inspections. Investigations include but are not limited to core samples, root crown excavation, and visual inspection of the entire trees by climbing. Please be advised that healthy trees and/or limbs may fail under certain conditions, and that any recommendations given are based on industry standards of tree care.

BACKGROUND

The two rows of large mixed blue gum and dwarf blue gum Eucalyptus trees (*Eucalyptus globulus* and *Eucalyptus globulus* 'Compacta') line the north and south ends of the water treatment plant located at 26900 Highway 1, Carmel, CA 93923. The majority of the trees are on the property outside the fence and owned by Carmel Area Wastewater District. Included in the report are several trees on neighboring adjacent properties that were previously headed that may need additional attention. I have been requested to visually assess the trees to make recommendations for treatment, in an effort to reduce what risk of failure the trees may present.

OBSERVATIONS

The following are observations taken on site:

- The majority of the trees are mature and range in height from 75 to 90 feet with diameters of 12 to over 40 inches.
- The majority of the trees have been pruned in the past utilizing heading cuts to reduce the trees height.
- The majority of the trees have included bark at their branch attachments and stem junctions.
- A suppressed tree adjacent to the entrance gate has a dead stem that will need to be removed.
- Two trees were observed with large fugal conks growing from their stems, the trees and their locations are as follows:
    - A multi-stemmed tree across from the solid waste conveyor belt.
    - The westmost tree in the north row of trees adjacent to several storage containers.
- Most trees have a high amount of water sprout “sucker” growth at the base. These sprouts may be removed to avoid future tree growth or retained for lower visual screening.

- One multi-stemmed cluster across from building 15 has a dead stem that will need removal.
- Several trees across the sodium bisulphate tanks in the southwest of the property have corrected leans and will need to be removed.
- A long, overextended branch across from the sodium bisulphate tanks needs to be pruned back to the main canopy to minimize its encroachment over the compound.
- A large multi-stemmed cluster outside of the fence in the northwest corner of the property has small weakly attached stems growing from previous heading cuts. This tree will need to be reduced to the old cuts to avoid future breakage.

DISCUSSION AND CONCLUSION

The Eucalyptus trees have been entered into a cycle of heading cuts that will need to be repeated to avoid failure of weakly attached new growth. In the past the trees were reduced to approximately 1/3 or more of their current height. The new sprouts that formed from these heading cuts do not originate from the center of the tree like normal branches but are instead formed in the cambial layer just underneath the bark. This produced new epicormic growth which is much weaker and prone to breaking and failing during windstorm events.

This is a limited case where heading cuts may be appropriate for the mature trees where there is a high risk of structural failure and thinning cuts (reduction cuts) cannot be used on some of the trees observed. During crown reduction treatments, whenever possible, use reduction cuts to reduce height and branch removal cuts (thinning cuts) to reduce branch end weights. When reduction and branch removal cuts are not possible (such as when interior lateral branches are not present) and tree hazard potential is high, then heading cuts will be needed, but their use should be minimized.

Additionally, several of the trees were also observed with fungal fruiting bodies in their stems. This fungus; Chicken of the woods (*Laetiporus gilbertsonii*) is usually found on dead material and is likely originating from previously cut branches or stems. The pathogen observed on the trees can invade live trees but does not constitute a significant risk in the trees which may be mitigated through pruning and monitoring.

Overall, the tree observed may be reduced by one third of their height through the mixed use of thinning, crown reduction, and some heading cuts. Also, follow-up pruning to minimize risk associated with weakly-attached shoots may be needed.

RECOMMENDATIONS

Tree Removal

The smaller trees prescribed for removal on the property present significant risk for failure. The trees must be removed to prevent possible injury or property damage. The tree shall be cut down by a licensed insured professional tree service, cut down in smaller manageable pieces consistent with safe arboricultural work practices, and roped down carefully so as not to damage any surrounding trees. The use of specialized equipment can be authorized if it can be shown that no damage to surrounding ecosystem will be sustained. At no time shall the trees be dropped in one piece so as to damage any surrounding trees or property. Tree wood and clippings are to be disposed of consistent with California Department of Forestry guidelines which would include stockpiling of material on site or disposal at an approved refuse site.

Tree pruning

The management of the eucalyptus should include a program where trees should be crown reduction pruned back to old heading cuts on a three to five-year cycle. Overall, they may be reduced by one third through the use of a mixture of thinning and some heading cuts. Pruning limb cuts of the eucalyptus should be performed down to the area where the old cuts previously made to minimize the occurrence of weakly attached epicormic sprouts and decrease entry points for decay in old branch stubs. Limb diameters will vary dependent on the parent stem of the limb for reduction.

Pruning of the tree will entail crown reduction to one third the tree height and entail deadwood removal down to 1-1/2" in diameter, crossing limbs where practical, clearances for access points and fences where needed, weight reduction on long heavy limbs and selective removal of interior growth. This does not completely remove all interior growth. Re-growth of the limbs of pruned eucalyptus trees will be very high in the first years, however, growth will be mainly vertical, and the new branches should not put on the significant diameter growth necessary for damage until three to five years from old pruning. Inspections of other limbs over the wastewater compound should be made during the pruning. Periodic monitoring and pruning should also occur every three to four years depending on the concerns of the district underneath the trees. All tall trees (both Eucalyptus globulus and Eucalyptus globulus compacta) should also be crown cleaned to allow better movement of wind through the canopy and help decrease breakage during storms. During this pruning event all broken, torn, cracked or weakly attached branches discovered should be removed for safety.

Sincerely,

Frank Ono
Certified Arborist #536

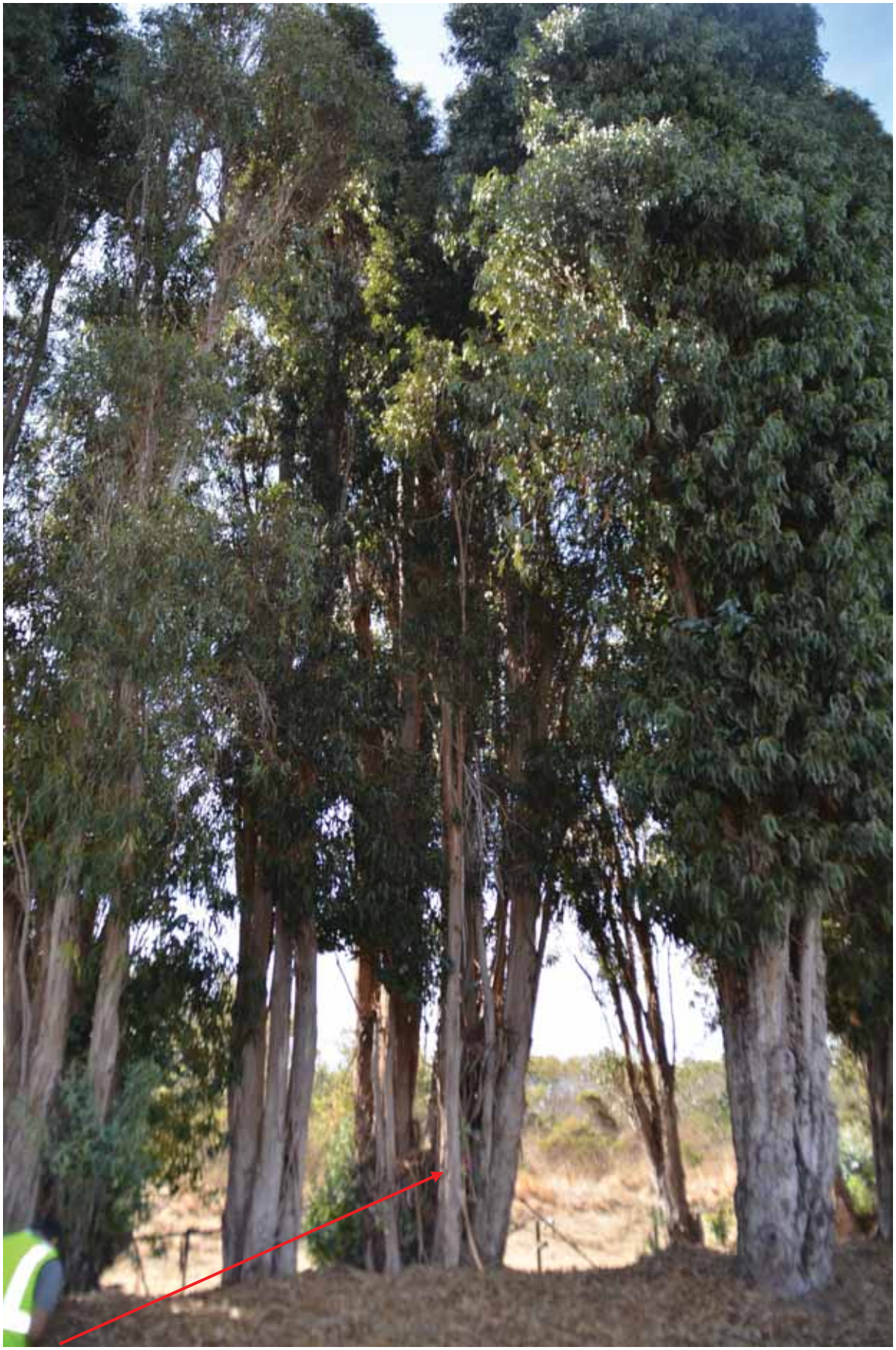
This report is based on a visual inspection of tree condition and for obvious defects. It is not intended to constitute a complete health and hazard evaluation. Further investigation would be required to more definitively evaluate the health and hazards posed by the subject trees, some of which may not be disclosed by visual inspections. Investigations include but are not limited to core samples, root crown excavation, and visual inspection of the entire trees by climbing. Please be advised that healthy trees and/or limbs may fail under certain conditions, and that the above recommendations are based on industry standards of tree care. This report is made with the understanding that no representations or warranties, either expressed or implied are made that any trees referred to in the report or located on or adjacent to the subject property are sound or safe.

PHOTOGRAPHS (not all trees are photographed, all trees need crown reduction with trees in need of removal or specific pruning are shown)

South row of trees viewing west.

North row of trees viewing east.

Tree with dead stem at entrance needs removal.



Tree with fungal fruiting bodies observed across from solid waste conveyor belt. This should be monitored

Fungal fruiting bodies on tree across from solid waste conveyor belt.

A number of trees have included bark at unions; this one appears to be separating and need attention

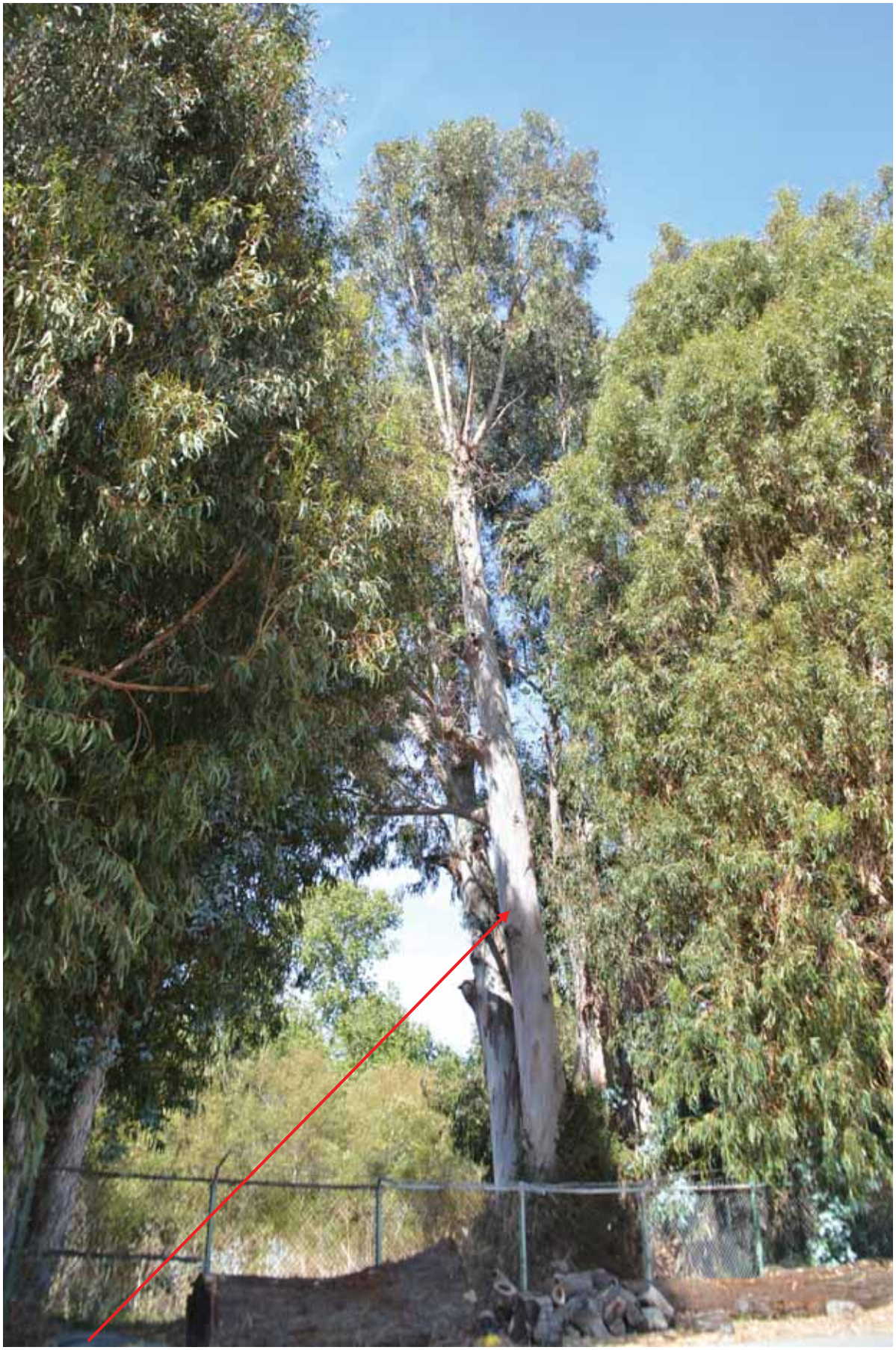
Dead stem across from building 15 needs removal.

Tree with a corrected lean located across from sodium bisulphate tanks. The tree will need the right side of its crown removed to the base

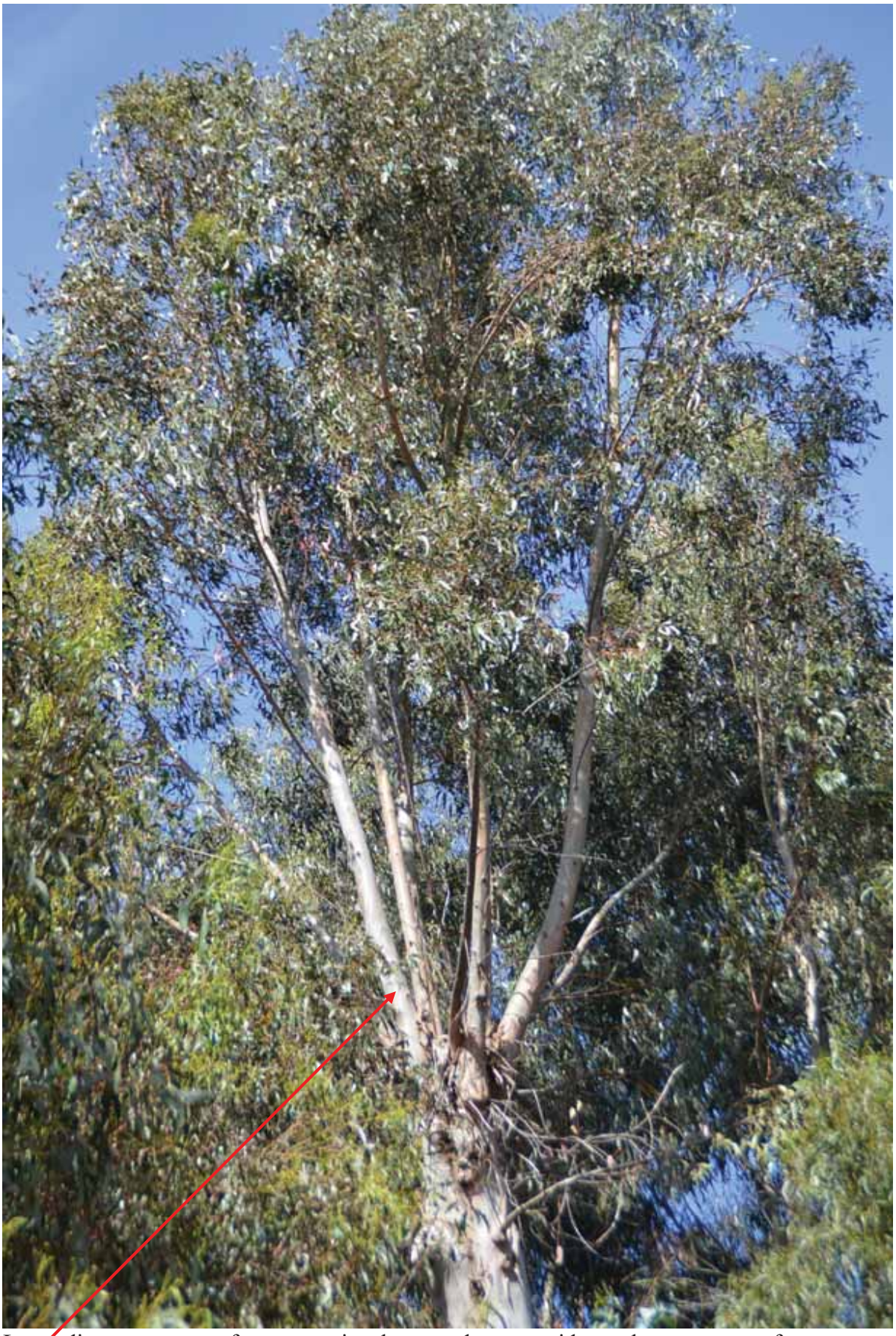
Overextended branch across from the sodium bisulphate tank needs to be shortened back.

Tree next to storage tanks with fungal fruiting bodies observed at base.

Fungal fruiting body on tree next to storage tanks in northwest corner.



Large cluster of trees outside northwest corner. The upper portion has weakly attached branches prone to breakage



Large diameter sprouts from a previously topped tree outside northwest corner of property.


North row of trees
South row of trees

Appendix B
Bird Survey Report

Burleson Consulting Inc.
Woman-Owned Small Business
Environmental Puzzle Masters

October 14, 2019

Patrick Treanor, P.E.
Plant Engineer
Carmel Area Wastewater District
3945 Rio Road
Carmel, CA 93922

Subject: Bird and Bat Survey for the Carmel Wastewater Treatment Plant, Carmel, California

Dear Mr. Treanor:

This report documents the findings of a bird and bat survey conducted by Burleson Consulting, Inc. (Burleson) on October 11, 2019. The survey was in support of the Carmel Wastewater Treatment Plant's planning and permitting efforts related to potential impacts to nesting birds and roosting bats during the trimming of up to 90 eucalyptus trees.

The purpose of this report is to document the presence/absence of nesting birds, existing nests or roosting bats on or in the eucalyptus trees proposed for trimming.

PROJECT LOCATION AND DESCRIPTION

The Carmel Wastewater Treatment Plant (Plant) is an approximately 8-acre facility located along the Carmel River approximately 0.4 miles west of Highway 1. The driveway leading to the facility is accessed at Highway 1 approximately 300 yards south of Oliver Road. The plant is surrounded to the north by the Carmel River and the City of Carmel. The south, east and west are surrounded by riparian woodland and floodplain.

Approximately 90 eucalyptus (*Eucalyptus* sp.) trees line the northern and southern boundary of the Plant creating a visual screen from surrounding neighborhoods. Approximately 64 eucalyptus trees line the southern boundary and approximately 26 eucalyptus trees line the northern boundary (see Photos 1, 2 and 3). One eucalyptus tree is present on the eastern boundary. Most of the trees are densely foliated with some sparse canopy mixed in (see Photo 4). The trees are approximately 80 feet tall. The Plant plans to trim the top 20-30 feet of each tree to reduce the potential for falling limbs during high winds and maintain the visual screen.

Little to no understory persists under the eucalyptus trees that line the Plant boundary due to the negative allelopathic properties (compounds which inhibit other plant species from growing nearby) of their leaves (see Photo 5). The surrounding habitat beyond the Plant is associated with the Carmel River and mixed riparian native woodland and floodplain dominated by cottonwood (*Populus* sp.) and willow (*Salix* sp.). The Plant interior is developed, and very little vegetation is present.

METHODOLOGY

The bird and bat survey was conducted by Burleson Wildlife Biologist Shawn Wagoner on October 11, 2019 between 0800 and 1130 hours. The survey focused on the 90 eucalyptus trees bordering the Plant

and tall vegetation within a 250-ft buffer surrounding the Plant. The biologist utilized binoculars (10x24) and a spotting scope (when needed) to scan each individual eucalyptus tree to detect existing nests or roosting bats. Each tree was scanned from the base to view the inside canopy and from 50-100ft away to observe the top canopy. Any bird observed within the eucalyptus tree was assessed for breeding behavior traits such as courtship displays, copulation, vegetation or food carries, presence of fledglings, and territorial displays (e.g. singing or aggression). Any nests observed in the eucalyptus trees were identified down to species group (e.g. raptor vs passerines) as best as possible. Any cavities or crevices found on eucalyptus tree trunks were closely inspected for bat sign, and tree branches were scanned for individual roosting bats.

SUMMARY OF FINDINGS

Weather conditions during the survey were slightly overcast, with temperatures ranging between approximately 55- and 65-degrees Fahrenheit, with 50% cloud cover or less, and winds at 0 to 10 mph. No special-status species were observed during the survey. All avian species observed/detected on or in the vicinity of the project site during the survey are listed below in Table 1.

Table 1. Avian Species Observed During Survey

Scientific Name	Common Name	Behavior/Comments
Calypte anna	Anna's hummingbird	One male foraging in lower third of eucalyptus tree along southern boundary, no breeding behavior noted
Buteo lineatus	Red-shouldered hawk	One adult moving around the vicinity of the eucalyptus trees along the northern boundary, no nests found
Picoides pubescens	Downy woodpecker	One in mixed flock in cottonwoods along northern boundary, not utilizing eucalyptus trees
Picoides nuttallii	Nuttal's woodpecker	One in mixed flock in cottonwoods along northern boundary, not utilizing eucalyptus trees
Sayornis nigricans	Black phoebe	One foraging around the interior of the Plant, not seen utilizing eucalyptus trees
Sayornis saya	Say's phoebe	One foraging around the interior of the Plant, not seen utilizing eucalyptus trees
Cyanocitta stelleri	Stellar's jay	Several heard north of the Plant, none seen utilizing the eucalyptus trees
Aphelocoma californica	California scrub jay	Several seen and heard around the boundary of the Plant, none seen utilizing the eucalyptus trees
Corvus brachyrhynchos	American crow	Several seen flying above and beyond the Plant, none seen utilizing the eucalyptus trees
Poecile rufescens	Chestnut-backed chickadee	Several seen foraging in southern eucalyptus trees, no breeding behavior detected, more seen in mixed flock in cottonwood along northern boundary
Regulus calendula	Ruby-crowned kinglet	Several seen and heard around the boundary of the Plant, none utilizing the eucalyptus trees
Sitta pygmaea	Pygmy nuthatch	Several in mixed flock in cottonwoods along northern boundary, not seen in eucalyptus trees
Polioptila caerulea	Blue-grey gnatcatcher	One heard east of the Plant, not utilizing eucalyptus trees
Thryomanes bewickii	Bewick's wren	One seen south of the Plant, not observed utilizing eucalyptus trees
Toxostoma redivivum	California thrasher	Several seen and heard beyond the southern boundary of the Plant, none utilizing the eucalyptus trees
Bombycilla cedrorum	Cedar waxwing	Small flock foraging in cottonwoods along northern boundary of the Plant, not utilizing eucalyptus trees

Scientific Name	Common Name	Behavior/Comments
Junco hyemalis	Dark-eyed junco	Two individuals foraging in the middle of the Plant, not utilizing eucalyptus trees
Zonotrichia atricapilla	Golden-crowned sparrow	Small flock foraging in riparian habitat beyond the southern boundary, none utilizing the eucalyptus trees
Melospiza melodia	Song sparrow	Several individuals heard beyond the boundary of the Plant, none utilizing the eucalyptus trees
Melozone crissalis	California towhee	Several detected in riparian habitat beyond the southern Plant boundary, none utilizing the eucalyptus trees
Pipilo maculatus	Spotted towhee	Several detected in riparian habitat beyond the southern Plant boundary, none utilizing the eucalyptus trees
Dendroica townsendi	Townsend's warbler	Several in mixed flock in cottonwoods along northern boundary, not seen in eucalyptus trees
Wilsonia pusilla	Wilson's warbler	One foraging in riparian habitat west of the Plant boundary, not utilizing eucalyptus trees

CONCLUSION AND RECOMMENDATIONS

There was a moderate level of avian activity during the survey and common resident/wintering species expected to occur in riparian and mixed native woodland areas were observed. One stick nest structure was observed within a sparse eucalyptus tree along the southern boundary. The biologist determined that this stick nest was an inactive passerine (songbird) nest and well below the planned trimming footprint. No other nests were observed during the survey. Additionally, no sign of nesting or residing owls were observed in any of the eucalyptus trees (i.e. no white-wash or pellets were found). No cavities or crevices were observed in the eucalyptus trees during the survey, and no roosting bats or roosting bat sign were observed in the canopy of any of the eucalyptus trees.

Generally, eucalyptus trees provide low to marginal avian nesting/bat roosting opportunities and based on the surrounding vegetation communities present (riparian, mixed native woodland and floodplain), it is likely that birds and bats may prefer to nest and roost in the surrounding landscape on adjacent property. However, given the sheer number of trees, dense foliage and nesting and roosting potential, we make the following recommendations:

1) tree trimming activity should remain outside of the nesting season (generally February 1-September 31), and
2) avian/bat surveys should be completed prior to future tree maintenance activities to minimize potential impacts.

Note: Although no special-status species were found, all common native birds are subject to protection under the federal Migratory Bird Treaty Act and California state laws.

Thank you for the opportunity to support the Carmel Wastewater Treatment Plant with this important project. Please do not hesitate to contact us with any questions.

Sincerely,
Burleson Consulting Inc.

Shawn Wagoner
Wildlife Biologist

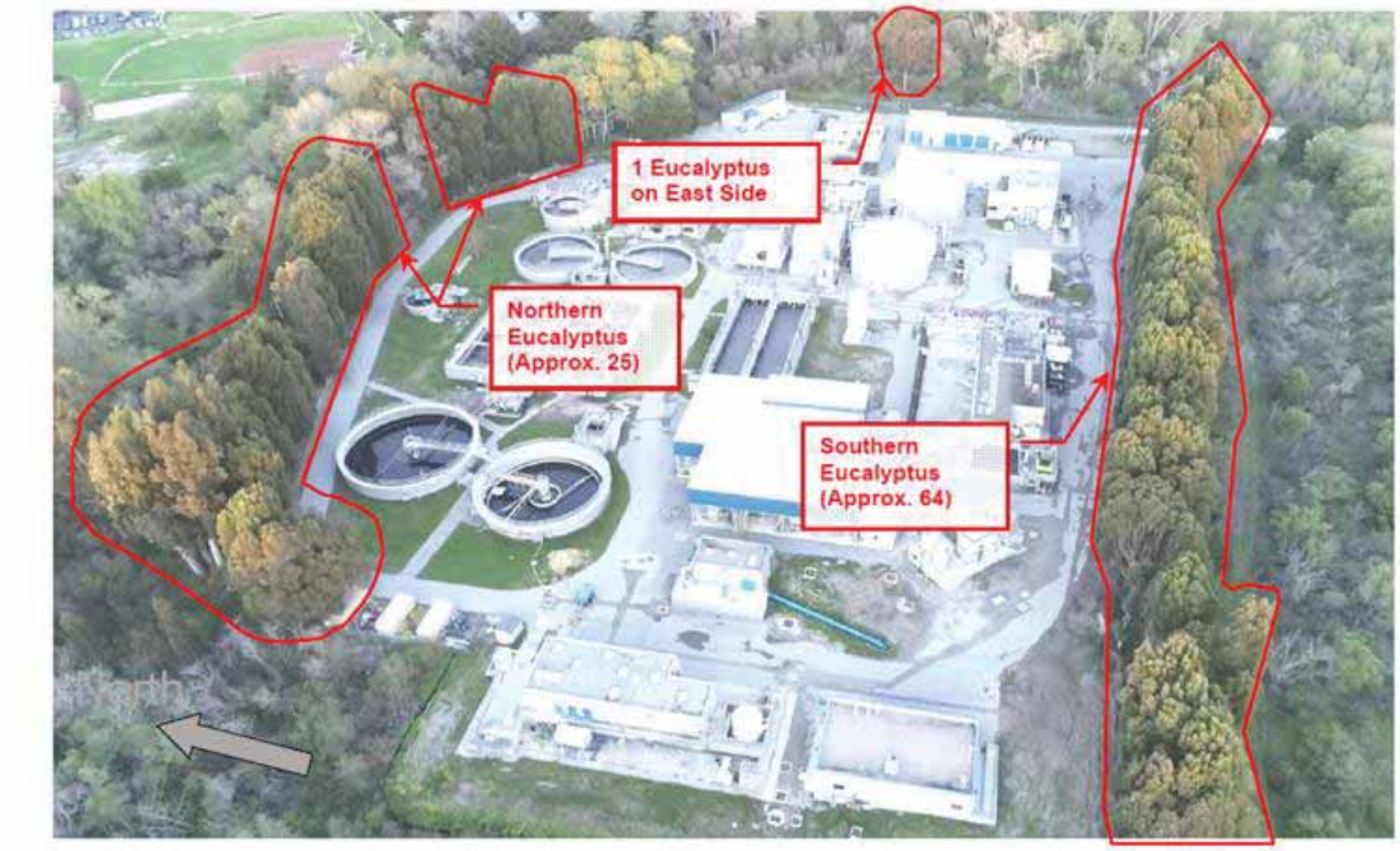


Photo 1. Aerial image of the eucalyptus trees bordering the Carmel Wastewater Treatment Plant.
(Photo courtesy of the Carmel Wastewater Treatment Plant)

Photo 2. Eucalyptus trees along the southern boundary.

Photo 3. Eucalyptus trees along the northern boundary

Photo 4. Representative canopy density of eucalyptus trees.

Photo 5. Representative understory of eucalyptus trees.