Screencheck Draft

Initial Study/Mitigated Negative Declaration

for the

Carmel Woods and Pescadero Road Sewer Main Rehabilitation Project

Prepared for:

Carmel Area Wastewater District
3945 Rio Road
Carmel, CA 93923

Prepared by:

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May 2026

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Project Summary

1. **Project Title**: Carmel Woods and Pescadero Road Sewer Main Rehabilitation Project (Project or Proposed Project)

2. **Lead Agency:** Carmel Area Wastewater District (CAWD or District)

3. **Contact:** Patrick Treanor, P.E., District Engineer
   3945 Rio Road, Carmel, CA 93922
   (831) 257-0436

4. **Prepared By:** Denise Duffy and Associates, Inc (DD&A)

5. **Date Prepared:** May 2026

6. **Project Location:** The Proposed Project consists of two components located along Pescadero Road and Carmel Woods. The Pescadero Road site is located along Pescadero Road, Lincoln Street, 2nd Avenue, and Monte Verde Street, and also includes work on the existing sewer line behind residential properties within the Del Monte Forest. The Carmel Woods site is located along Camino Del Monte, San Juan Road, San Marcos Road, San Lucas Road, Portola Avenue, San Luis Road, South San Luis Road, San Pedro Lane, San Mateo Avenue, Carpenter Street, and along State Route (SR) 1 in the Carmel Woods residential area, directly northeast of the Pescadero Road area. Both components of the Proposed Project are located entirely within the Coastal Zone. The majority of the Proposed Project is located in unincorporated Monterey County, California, with a small portion of the Pescadero Road site crossing over into the municipal boundaries of the City of Carmel-by-the-Sea (City).

7. **Name of Property Owner/Project Proponent:** Carmel Area Wastewater District

8. **Assessor's Parcel Number(s):** Please refer to **Table 1**.

9. **Project Area of Disturbance:** The Pescadero Road Project component includes trenching and ground disturbance of approximately 2,800 square feet (sf) (0.06 acres), and grading of 1,600 cubic yards (cy) of cut and 1,600 cy of fill. The Carmel Woods Project component includes trenching and ground disturbance of approximately 8,000 sf (0.18 acres), and grading of 1,800 cy of cut and 1,800 cy of fill. The total area of trenching and ground disturbance is 10,800 sf (0.24 acres), and the total area of grading is 3,400 cy of cut and 3,400 cy of fill.

10. **Project Description:** The Proposed Project, as described above, is located on two sites in a residential area located primarily within unincorporated Monterey County land, with a small portion of the Project occurring within the northern limits of the City. The Pescadero Road component of the Proposed Project would consist of constructing a new sewer main in Pescadero Road and abandoning a portion of the existing sewer main in the hillside located behind nearby residential connections. The Carmel Woods component of the Project consists of the replacement and/or rehabilitation of approximately 14,850 LF of existing deteriorated 6-inch diameter vitrified clay pipe (VCP) gravity sewer main with new polyvinyl chloride (PVC) or high-density polyethylene (HDPE) sewer mains or installation of a lining system. The majority of the sewer mains would be replaced and/or

rehabilitated along the existing alignments where feasible. However, several sewer segments would be realigned to improve ease of maintenance.

Replacing and rehabilitating the damaged sewer mains at the Pescadero Road and Carmel Woods sites is necessary to continue to provide reliable service to the District's customers and minimize the potential for sewer spills in the future. CAWD considers the repair of infrastructure for the Pescadero Road component to be critical due to its proximity to Pescadero Creek and associated riparian corridor. The rehabilitated sewer main would continue to be used to convey wastewater for District customers located along Pescadero Road, whose service laterals directly connect to the sewer main to be replaced, while the majority of existing flows to this sewer main would be redirected to the new sewer main.

11. **Local Coastal Plan Designations:** Medium Density Residential, Forest Open Space

12. **Zoning Districts**: MDR-CZ (Medium Density Residential (Coastal Zone)), RC-CZ (Resource Conservation (Coastal Zone))

Chapter 1. Introduction and Project Description

1.1 INTRODUCTION

This Initial Study has been prepared to evaluate the potential environmental effects associated with the Carmel Area Wastewater District's (CAWD's or District's) Carmel Woods and Pescadero Road Sewer Main Rehabilitation Project (Project or Proposed Project), located within the Coastal Zone in unincorporated Monterey County, California. This document has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code §21000 et. seq., and the State CEQA Guidelines, California Code of Regulations (CCR) §15000 et. seq.

An Initial Study is an informational document prepared by a Lead Agency to determine if a project may have a significant effect on the environment (CEQA Guidelines §15063, subd. (a)). If there is substantial evidence that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared, in accordance with CEQA Guidelines §15064(a). However, if the Lead Agency determines that revisions in the project plans or proposals made by or agreed to by the applicant to mitigate the potentially significant effects to a less-than-significant level, a Mitigated Negative Declaration (IS/MND) may be prepared instead of an EIR (CEQA Guidelines §15070, subd. (b)). Per CEQA Guidelines for an IS/MND, a Lead Agency prepares a written statement describing the reasons a proposed project would not have a significant effect on the environment and, therefore, why an EIR need not be prepared. This IS/MND conforms to the content requirements under CEQA Guidelines §15071.

CAWD is acting as the Lead Agency pursuant to CEQA Guidelines §15050(a). As the Lead Agency, CAWD has prepared this IS/MND pursuant to CEQA Guidelines §15063 and §15070 as the project does have some significant impacts on the environment that can be mitigated to less-than-significant with identified measures. CAWD, as the Lead Agency, will circulate this IS/MND for agency and public review during a 30-day public review period pursuant to CEQA Guidelines §15073. Comments received by CAWD on this IS/MND will be reviewed and considered as part of the deliberative process in accordance with CEQA Guidelines §15074.

Publication of this IS/MND marks the beginning of a 30-day public review and comment period. During this period, the IS/MND will be available to local, state, and federal agencies and to interested organizations and individuals for review. Written comments concerning the environmental review contained in this IS/MND during the 30-day public review period should be sent to:

Patrick Treanor, P.E., District Engineer
3945 Rio Road, Carmel, CA 93922
(831) 257-0436

This IS/MND and all documents referenced in it are available for public review at the CAWD office located at the above address. Following the conclusion of the public review period, CAWD will consider the adoption of the IS/MND for the Proposed Project at a regularly scheduled public hearing. CAWD shall consider the IS/MND together with any comments received during the public review process. Upon adoption of the IS/MND, CAWD may proceed with approval actions for the Proposed Project. If CAWD approves the Project, they will file a Notice of Determination (NOD), which will be available for public inspection and posted in 24 hours of receipt at the Monterey County Clerk's Office for 30 days. The filing

of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15075(g)).

CAWD prepared the following section consistent with the requirements of CEQA Guidelines Section 15124 to the extent that it applies to the Proposed Project. The following section provides a discussion of key background details related to the Proposed Project, including project components, site and area characteristics, and applicable regulatory requirements.

1.2 PROJECT LOCATION AND SURROUNDING USES

The Proposed Project, as described below, is located on two sites in a residential area within the northern limits of the City of Carmel-by-the-Sea (City) and unincorporated Monterey County (**Figure 1**). Regional access to both Project areas is provided from State Route 1 (SR 1). Local access to the Project sites is provided by Camino Del Monte, Carpenter Street, Pescadero Road, and Monte Verde Street (**Figure 2**). The Proposed Project is located primarily in unincorporated Monterey County between the City and Del Monte Forest, which is located in the Coastal Zone. The 1982 Monterey County General Plan, instead of the 2010 Monterey County General Plan, regulates activities within the Coastal Zone in Monterey County. In addition, the Carmel Area LUP provides regulations and polices relevant to the Proposed Project site. The City's General Plan policies may also apply to the portion of the Proposed Project that occurs within City limits, and likewise, the Del Monte Forest Area Plan's policies may apply to the portion of the Proposed Project located along the existing Pescadero sewer alignment.

The Project sites are surrounded primarily by residential, public/quasi-public, educational, and open space uses. The Project sites consist of open space and public rights-of-way.

The Proposed Project is zoned as MDR-CZ (Medium Density Residential (Coastal Zone)) and RC-CZ (Resource Conservation (Coastal Zone)). General Plan designations include Public-Right-of-Way, Residential – Medium Density (Carmel Area LUP), and Open Space – Forest (Del Monte Forest LUP). Surrounding land uses include:

- North: Open Space – Forest (Del Monte LUP)
- South: Single Family Residential (City's General Plan/Coastal LUP)
- East: Residential – Medium Density, Public/Quasi-Public
- West: Open Space – Forest (Del Monte LUP)

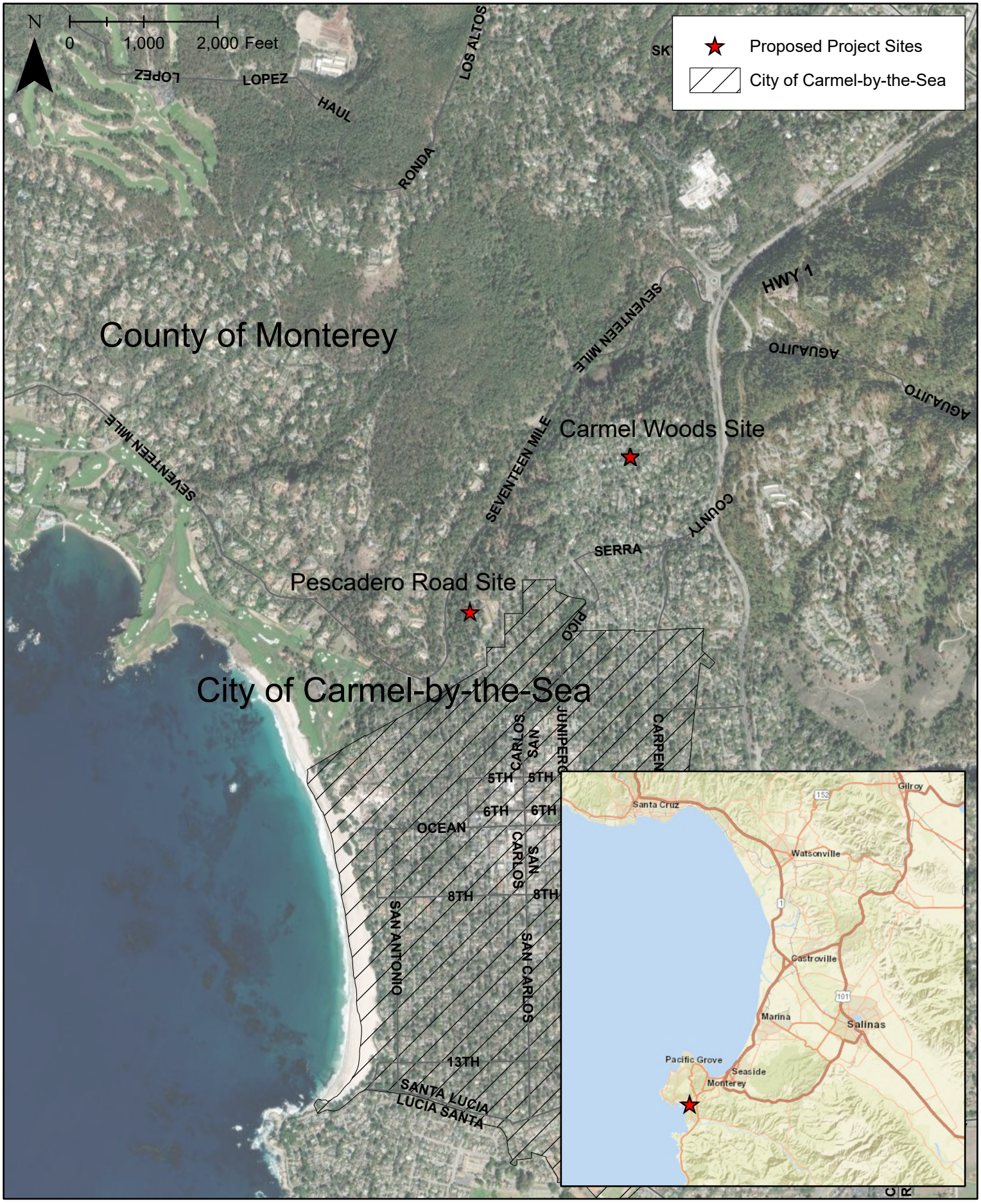
Location information specific to each of the Project components is provided below.

Pescadero Road

The first area (Pescadero Road) is located along Pescadero Road, Lincoln Street, 2nd Avenue, and Monte Verde Street on the Assessor's Parcel Numbers (APNs) outlined below and the public rights-of-way (ROWs) (**Figure 2**). The following list identifies the APNs where work would occur for the Project:

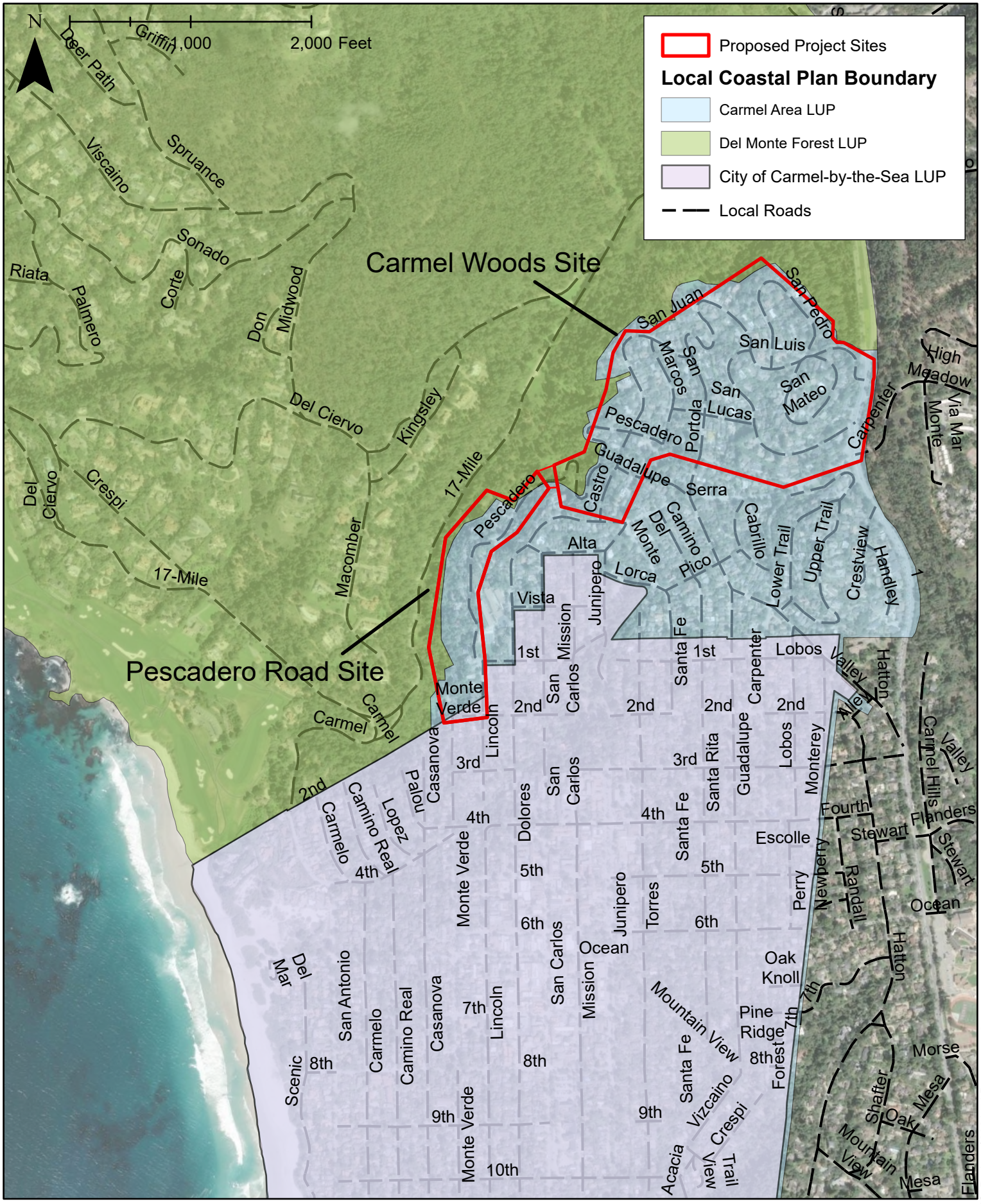
- 008-161-014-000
- 009-112-013-000
- 009-122-012-000

Figure 1. Regional Map



Regional Map	Date 1/8/2026 Scale 1:20,000	Denise Duffy & Associates, Inc. Planning and Environmental Consulting	Figure 1

Figure 2. Location Map



Proposed Project Location

Date	Figure
2/26/2026	2
Scale 1:12,250	

Denise Duffy & Associates, Inc.
Planning and Environmental Consulting

Path: C:\GIS\GIS_Projects\2021-74 Pescadero Sewer Replacement\ArcPro\Pescadero Sewer CEQA.aprx

Carmel Woods

The second area (Carmel Woods) is located along Camino Del Monte, San Juan Road, San Marcos Road, San Lucas Road, Portola Avenue, San Luis Road, South San Luis Road, San Pedro Lane, San Mateo Avenue, Carpenter Street, and along Highway 1 in the Carmel Woods residential area, directly northwest of the Pescadero Road area, between Highway 1 and 17 Mile Drive, bounded by Camino Del Monte in the south (**Figure 2**). This site would be located on the following APNs as identified in **Table 1** and the public ROWs.

Table 1
Carmel Woods Area Project APNs

Project APNs	Project APNs	Project APNs
009-033-005-000	009-021-002-000	009-033-008-000
009-031-014-000	009-031-016-000	009-024-010-000
009-021-015-000	009-012-020-000	009-012-002-000
009-012-003-000	009-012-004-000	009-012-005-000
009-012-006-000	009-023-009-000	009-023-002-000
009-023-003-000	009-023-004-000	009-041-054-000
009-041-056-000	009-041-060-000	009-041-045-000
009-051-021-000	009-051-020-000	009-051-022-000
009-022-003-000	009-022-002-000	009-012-012-000
009-012-013-000	009-012-014-000	009-012-015-000
009-012-016-000	009-013-008-000	009-013-006-000
009-013-002-000	009-091-001-000	009-091-019-000
009-091-020-000		

1.3 PROJECT BACKGROUND

CAWD is a publicly-owned wastewater district that provides wastewater collection and treatment services to the City and surrounding portions of unincorporated Monterey County. CAWD is an independent political entity governed by its own five-member Board of Directors who are elected for terms of four years each. CAWD's total service area is comprised of approximately 5.5 square miles with a permanent population of approximately 11,000 people. CAWD also provides wastewater treatment and disposal for 4,500 people in Del Monte Forest as provided for by contract agreement with Pebble Beach Community Services District. Background information for each of the Project components is provided below.

Pescadero Road

The sanitary sewer collection system in the Pescadero Road Project component is substantially built out under existing conditions. The District is seeking to replace a damaged section of sewer main located in and parallel to Pescadero Road on the northwest side of the City (primarily outside the City limits) to continue to provide reliable service to the District's customers and minimize the potential for future sewer spills. The existing sewer main on the forested hillside of Pescadero Canyon has been damaged by tree falls and is in poor condition. Localized high points and other condition issues have caused several sewer spills, and maintenance crews have had difficulty accessing the sewer main for maintenance. Frequent maintenance is required due to its poor condition. The sewer infrastructure was installed

approximately 80 years ago, and the pipeline was constructed of six-inch vitrified clay pipe (VCP). Record drawings of the existing sewer main are not available.

The sewer main crosses several properties along the existing alignment to be replaced, including private residential properties and property owned by the Del Monte Forest Conservancy, designated as the "Pescadero Canyon Property." The ground surface in this area is steeply sloped from the east to the west, unstable, and currently inhabited by various plant and animal species, including Monterey pines and coast live oaks. The existing sewer main runs upslope from, and parallel to, Pescadero Creek and associated riparian corridor. The sewer main conveys wastewater from approximately 275 parcels, primarily residential, within the District's service area to the District's regional wastewater collection infrastructure and ultimately to the District's Wastewater Treatment Plant (WWTP). Of these parcels, 19 are located along Pescadero Road and have service laterals directly connected to the sewer main to be replaced. Five manholes and approximately 1,600 linear feet (LF) of sewer main lie within the Pescadero Canyon Property. The section of sewer main to be replaced begins at District manhole N601, located within the roadway near 24652 Pescadero Road. From this point, it extends from Pescadero Road to the west, inside of the property line at 24652 Pescadero Road (APN 009-112-013) to manhole N602, then turns south in the Pescadero Canyon Property (APN 008-161-014); the segment to be replaced terminates on a private property north of Toyon Heights (APN 009-122-012) at manhole N609 (**Figure 3**).

Carmel Woods

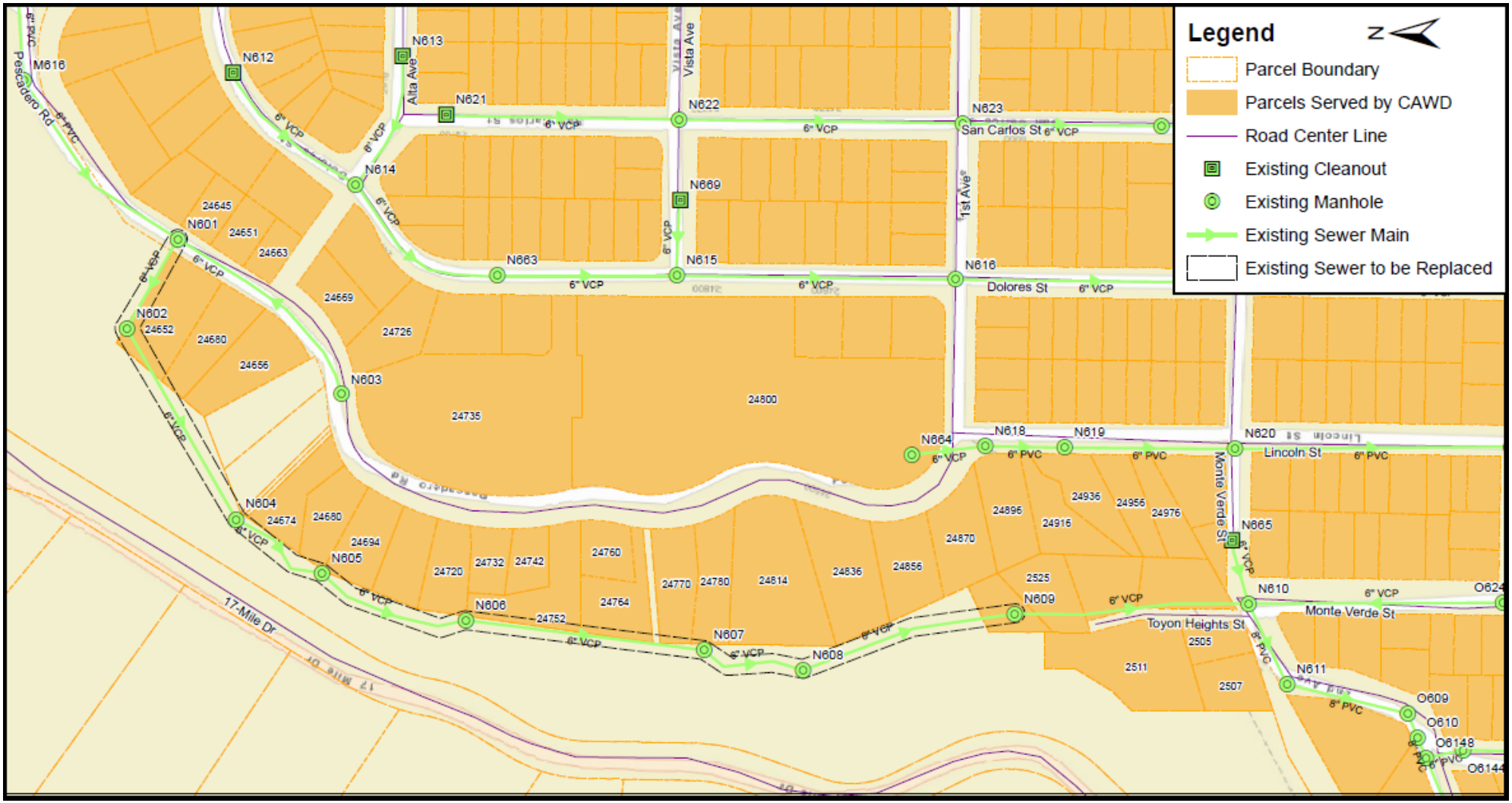
The sanitary sewer collection system in the Carmel Woods Project component is substantially built out under existing conditions. The District assessed the condition of the existing gravity sewer mains and manholes within the Carmel Woods Project component and identified various replacement and rehabilitation measures. Damaged VCP mains are recommended to be replaced with new polyvinyl chloride (PVC) or high-density polyethylene (HDPE) pipes in accordance with CAWD standards. The District proposes to install an internal lining system for existing sewer mains with minimal defects. The District would either replace all manholes determined to be in poor condition with new pre-cast concrete manholes or rehabilitate existing manholes with a lining system. In addition, the District would perform various minor repairs for all existing manholes found to be in good condition without substantial defects to extend the life of the manholes.

1.4 PROJECT COMPONENTS

Existing System and Flow Design

The sanitary sewer collection system in each of the Project components is substantially built out and only a handful of parcels within each of the Project sites are vacant. For this reason, future flows under Project conditions are not projected to significantly increase compared to existing flows. With proactive system management, peak sewer flow rates may decrease in the future as the District eliminates cross connections between storm drains and the sanitary sewer and completes other upgrades to reduce inflow and infiltration. Based on the historical and projected flow rates, a design flow rate of 400 gallons per minute (GPM) was assumed for the Pescadero Project component. A majority of the Carmel Woods area flows into the Pescadero Road sewer main; therefore, the design flow rate is 400 GPM or less in this Project area.

Figure 3. Existing Alignment Map



Source: MNS Engineers (February 2026)

Existing Sewer Main Alignment	Date 04/17/2024 Scale N/A	Denise Duffy & Associates, Inc. Planning and Environmental Consulting	Figure 3

Pescadero Road

The Pescadero Road Project component would consist of constructing a new sewer main in the Pescadero Road site and abandoning a portion of the existing sewer main in the hillside (**Figure 4**). The proposed alignment would reconfigure existing upstream manhole N601 and connect a new gravity sewer to existing downstream manhole N610 with new 10-inch PVC gravity sewer; refer to the Draft 60 percent project design plans in **Appendix A**. The existing sewer segment between manhole N601 and cleanout N603 would be demolished and removed. Flow direction along this segment would be reversed with installation of the new gravity sewer. Existing manholes and sewer between manhole N618 and N620 would be demolished, removed, and reconstructed in place. The new sewer would be installed with HDPE using pipe bursting in the existing horizontal and vertical alignment. Between manhole N620 and N610, the proposed alignment would travel through the cul-de-sac on Second Avenue and continue to manhole N610 at the intersection of Monte Verde Street and Second Avenue. The new sewer would be constructed using open trench construction from manhole N616 to existing manhole N618. From manhole N618 to approximately eight LF before manhole N620, the new sewer would be installed with HDPE using pipe bursting in the existing horizontal and vertical alignment. From the new manhole at the intersection of Lincoln Street and 2nd Avenue, new PVC sewer main would be installed to the existing cleanout to the west end of 2nd Avenue by open trench construction. From the existing cleanout, where a new manhole is planned, to manhole N610, the new sewer would be installed with HDPE using pipe bursting in the existing horizontal and vertical alignment. In total, approximately 2,325 LF of new 10-inch sewer main and 13 manholes would be constructed.

Trench excavation depths are anticipated to range between six and 22 feet below grade. Pipeline trenches would be backfilled with crushed rock and/or Class II aggregate base and paved, except in unimproved areas. Manholes would be constructed of precast concrete or poured in place per District standards. The Project would reconfigure existing manhole N601 several feet upstream to a slightly higher elevation to minimize the manhole depth and reduce excavation costs in the area immediately downstream of this manhole where the gravity sewer main could reach depths of 22 feet below grade. In addition to the sewer improvements in the Pescadero area, the Project would address drainage issues on the eastern, up-slope side of Pescadero Road by re-establishing the drainage ditch through grading.

A portion of the existing sewer between N601 and N602 at the Pescadero Road site would be abandoned in place. Sewer mains would be filled with ”one-sack” slurry or cellular concrete. This work would be completed using hand and power tools carried on foot from Pescadero Road. Hoses and cords from Pescadero Road would be required to convey concrete and power equipment, which would be laid on grade to accomplish this work. Provisions would be set in place to prevent any slurry or other materials from spilling from the sewer main and manholes to the surrounding areas. No wheeled or tracked equipment would be allowed outside the public right-of-way.

Figure 4. Proposed Pescadero Road Site Plan

0 62.5 125 250 Feet

1 inch = 150 feet

Source: MNS Engineers (February 2026)

Proposed Pescadero Road Site Plan

Date
01/08/2026

Scale
N/A

Denise Duffy & Associates, Inc.
Planning and Environmental Consulting

Figure
4

Carmel Woods

The Carmel Woods Project component consists of the replacement or rehabilitation of approximately 14,850 LF of existing deteriorated six-inch diameter VCP gravity sewer main with new PVC or HDPE sewer mains or installation of a lining system. The majority of the sewer mains would be replaced or rehabilitated along the existing alignments, where feasible. However, several segments would be realigned to improve ease of maintenance. **Figure 5** shows the Carmel Woods Project component and recommended rehabilitation and replacement measures. The gravity sewer main would be replaced using pipe-bursting construction for replacement where feasible or rehabilitated using a cured-in-place pipe (CIPP) or fold-and form liner system to minimize open trench construction. Slip lining would also be used to convert some sewer main segments into sewer laterals (between four and six inches in diameter). Manholes in poor condition would either be replaced with new pre-cast concrete manholes or rehabilitated, per District preference, in accordance with CAWD standards. The Project includes various minor repairs for existing manholes determined to be without substantial defects to extend their working lives. In total, the Carmel Woods component of the Project would replace approximately 2,425 LF of new eight-inch sewer main, 8,875 LF of new six-inch sewer main, 550 LF of new four-inch sewer lateral connections, and 12 manholes. Approximately 2,300 LF of the existing sewer main lining would be rehabilitated through CIPP and fold-and-form methods.

This component of the Project includes abandonment of portions of the sewer main on San Marcos Road. A 188-foot portion of the sewer main between manhole M710 and manhole M711 would be realigned further into the street to an intermediate manhole that would be installed as part of the project. The existing line would be abandoned in place. Abandoned sewer mains would be filled with ”one-sack” slurry or cellular concrete.

1.5 PROJECT CONSTRUCTION

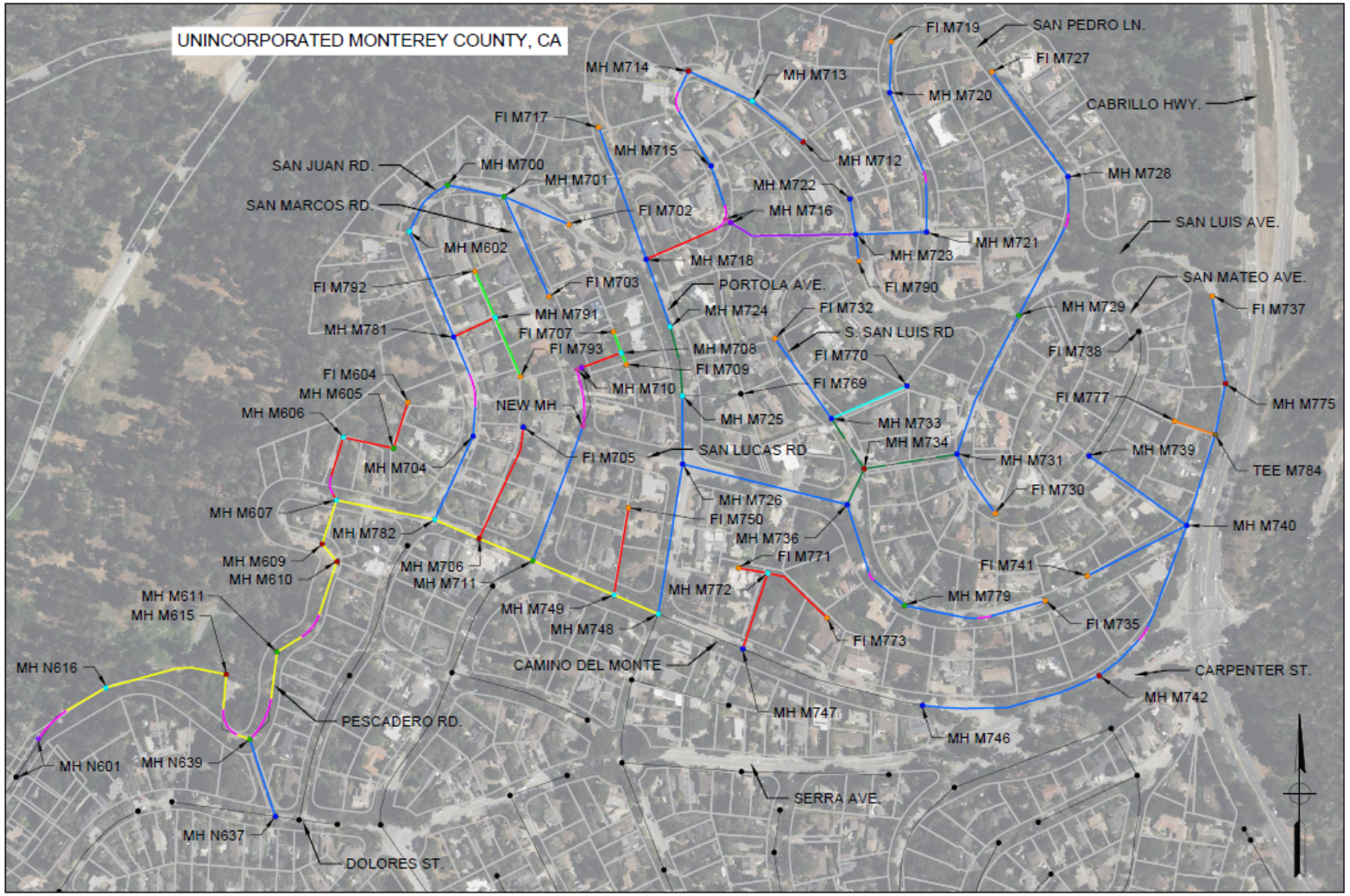
Site Preparation

Site preparation for the Project would involve implementation of Stormwater Best Management Practices (BMPs) (i.e. erosion control, runoff and sediment control plans, etc.), pre-closed-circuit television (CCTV), marking and potholing existing utilities, setting up signage and traffic control, laying out trenches, sawcutting pavement for trenches, and preparing the materials to be installed.

The ground surface in the Pescadero Road area is steeply sloped, unstable, and consists primarily of existing residential uses. Construction of this Project component is anticipated to be by a combination of open trench, trenchless, and standard construction methods. This component of the Proposed Project includes trenching and ground disturbance of approximately 2,800 square feet (sf) (0.06 acres), and grading of 1,600 cubic yards (cy) of cut and 1,600 cy of fill.

The ground surface in the Carmel Woods area includes flat and sloped areas and consists primarily of existing residential uses. Construction of this Project component is anticipated to be a combination of open trench, trenchless, and standard construction methods. This component of the Proposed Project includes trenching and ground disturbance of approximately 8,000 sf (0.18 acres), and grading of 1,800 cy of cut and 1,800 cy of fill. Overall, grading for both Project components would be balanced, resulting in zero net cut or fill.

Figure 5. Proposed Carmel Woods Plan



PIPING REPAIR METHOD LEGEND

STYLE	REPAIR METHOD
	UV CURED-IN-PLACE PIPING
	TRADITIONAL CURED-IN-PLACE PIPING
	HDPE SLIP LINE
	OPEN TRENCH CONSTRUCTION (SIZE IN KIND)
	PIPE BURSTING CONSTRUCTION - 6" TO 6"
	PIPE BURSTING CONSTRUCTION - 6" TO 8"
	LIMITED DEFICIENCIES - REMOVE FROM PROJECT
	OPEN TRENCH - 4" HDPE
	FOLD-AND-FORM

MANHOLE MEASURE LEGEND

COLOR	REPAIR MEASURE
	LINE MANHOLE
	REPLACE MANHOLE
	INSTALL NEW MANHOLE
	REPLACE CLEANOUT
	RELOCATE MANHOLE
	REPAIR MANHOLE
	CONNECT TO MAIN WITH 4" WYE
	REPLACE FRAME AND COVER

0' 125' 250'

1 in. = 250 ft.

Source: MNS Engineers, February 2026

Proposed Carmel Woods Site Plan

Date 01/08/2026

Scale N/A

Denise Duffy & Associates, Inc.
Planning and Environmental Consulting

Figure 5

Site preparation activities would be phased with the movement of construction. Each area would be prepared before construction begins. These activities are anticipated to be completed within approximately 16 months.

Sewer Installation

The Project includes the use of trenchless installation methods, specifically pipe bursting, for installation of the majority of sewer main segments. Use of trenchless sewer installation was determined to reduce the costs and risks associated with excavating deep trenches. Open trench excavations would still be necessary for several segments of the project to repair sags in the pipe or in locations where trenchless methods are not feasible.

A portion of the alignment on Lincoln Street and a segment from Monte Verde to 2nd Avenue within the Pescadero Road Project component is in the same horizontal and vertical alignment as the existing main. Trenchless installation, specifically pipe bursting, can be used in these two segments.

Pipe bursting would be used in the Carmel Woods area to replace the sewer mains within public rights-of-way, except for two segments that would require some open trenching due to realignment or difficulty using pipe bursting (**Figure 5**). Some segments replaced by pipe bursting would require short segments of open trenching to replace fittings in the existing main line with long sweep fittings or other pipe materials.

The Project sites would be restored to existing conditions following construction. Pipeline trenches would be backfilled with crushed rock and/or Class II aggregate base and paved, except in unimproved areas. Any existing improved areas, including pavement and private improvements, disturbed during construction would be restored to pre-Project conditions, or better.

Bypass Pumping

Bypass pumping would be required during construction to convey wastewater around the work area. Bypass pumping may be required overnight for work that cannot be completed in a single workday. These pumps are typically powered by a gas-powered generator or direct gas-powered drive. They typically output 66 decibels at a distance of 10 feet and 63 decibels at a distance of 20 feet. In addition, isolated short term bypass pumps would be located on individual laterals as needed. Gravity bypasses may also be used.

Geotechnical Engineering

Trenches in some areas would exceed 20 feet in depth. Due to the deep trench excavations anticipated along the alignments and other potential engineering issues, a Geotechnical Investigation was completed to provide recommendations for design at the Pescadero Road site; refer to **Appendix E** (Pacific Crest Engineering, Inc., 2022). A shoring plan prepared, stamped, and signed by a licensed civil engineer would be required from the contractor prior to the start of excavation.

Easements

The proposed alignment for the Pescadero Road Project component rests entirely within the public ROWs along Pescadero Road, Lincoln Street, and Monte Verde Street, and, therefore, no permanent

access easements would be necessary for the installation or future work on the sewer. An existing easement for CAWD pipelines is located on the Pescadero Canyon Property (APN 008-161-014-000). However, during the abandonment of the existing sewer infrastructure, a temporary construction easement or access agreement would be required for the property at 24652 Pescadero Road (APN 009-112-013-000). The District may consider modifying easements along the existing sewer alignment for long-term access to remaining portions of the existing sewer main.

The proposed rehabilitation and replacement activities in the Carmel Woods Project site would occur within the public rights-of-way and existing easements and no new permanent access easements would be necessary for the installation or future work on the sewer.

Schedule

Construction is expected to begin in Fall 2026. Construction activities would include mobilization and site preparation, pipeline construction, and site restoration. Construction is expected to occur over 16 months and the anticipated schedule of these construction activities is as follows:

1. Mobilization and site preparation: This construction phase would last approximately two months.
2. Pipeline construction: This construction phase would last approximately 12 months.
3. Site restoration: This construction phase would last approximately two months.

The construction contractor would determine the precise sequencing of the construction phases above.

Equipment and Personnel

In support of these activities and for the assumptions for this document, the types of equipment that may be used during construction are anticipated to include:

- Excavator
- Backhoe
- Dump Truck
- Delivery Truck
- Water Truck
- Pipe fusing equipment
- Winch/Pulling Unit and Cable with Bursting Head
- CIPP Lining equipment
- Concrete truck
- Asphalt Paver

A maximum of eight construction personnel may be present with an estimated eight trips per day for workers and equipment over the course of 16 months.

Solid waste generated during construction and demolition activities would be disposed of at the nearest regulated landfill, which is the Monterey Peninsula Landfill and Materials Recovery Facility located north of the City of Marina and operated by ReGen Monterey.

Construction Equipment and Materials Staging and Storage

A designated staging area located at the District's WWTP would be used during construction as the primary location for storage and refueling of construction materials, equipment, and vehicles. No grading would be required within this staging area.

Additional staging and storage of materials and equipment would occur within each of the Project sites within public ROWs and outside of environmentally sensitive areas. No grading or permanent impacts would occur within these staging areas.

Construction Circulation and Access

Construction activities would be within the public ROW and easements, with access to the Project sites provided via existing paved roadways. Abandonment of existing sewer infrastructure is expected to be completed using hand and power tools carried on foot to the existing sewer at the Pescadero Road site. Therefore, no wheeled or tracked equipment would require access outside of the public ROW for this portion of the work. Access to the existing sewer for abandonment would be achieved through existing or temporary easements if required.

During construction in the Pescadero Road area, portions of Pescadero Road, Lincoln Street, and Monte Verde Streets in the vicinity of the work would be subject to intermittent closures to vehicle and pedestrian through traffic during working hours. Full roadway closures would be minimized to the extent feasible; however, temporary full roadway closures within the active open trench area may be required during certain phases of construction. Resident access located within the Project area would be maintained at all times. In addition, any road closures as a result of the Project would be conducted in accordance with the requirements of an encroachment permit issued by the County of Monterey (for work in unincorporated Monterey County) and/or the City (for work within the City limits).

Detours and road closures in the Carmel Woods area would be temporary and would vary as construction occurs. Road closures would be segmented as work is being completed and residents would be informed in advance when their residence would be impacted in order to make proper arrangements during working hours. Traffic would be routed around the work area through 1st Avenue, Dolores Street, and Castro Lane. At the end of each working day, all excavations would be plated, and the roadway would be reopened to traffic.

During construction at the Carmel Woods Project site, various impacts to vehicle and pedestrian access would occur, including lane closures and complete road closures. Detour plans would be developed to maintain access for local traffic. At the end of each working day, all excavations would be plated, and the roadway would be reopened to traffic.

Tree Removal

Two Monterey pine trees are proposed to be removed at the Pescadero Road Project site. The trees are located within the Proposed Project construction area (see **Appendix A**, Sheets C-2 and C-3) and would be removed to facilitate access for construction activities. No additional tree removal is proposed as part of the Project. Any required tree replacement or mitigation would be implemented in accordance with local ordinances, as applicable (see **Section 4.3** of this document for further discussion).

1.6 PROJECT OPERATION

Once completed, the Project sites would be accessed by Pescadero Road, Dolores Street, Monte Verde Street, or Camino Del Monte. Because of the overall improvements to the systems, the Project is anticipated to generate fewer trips for operations and maintenance once operational compared to CAWD's existing maintenance schedule.

1.7 PROJECT OBJECTIVES

Replacing and rehabilitating the damaged sewer mains at the Pescadero Road and Carmel Woods sites is necessary to continue to provide reliable service to the District's customers and minimize the potential for sewer spills in the future. CAWD considers the repair of infrastructure for the Pescadero Road component to be critical due to its proximity to Pescadero Creek and associated riparian corridor. The replaced sewer main would continue to be used to convey wastewater for District customers located along Pescadero Road whose service laterals directly connect to the sewer main to be replaced.

The primary Project goal is to replace the damaged sewer main to continue providing reliable service and minimize the potential for sewer spills. To best meet the primary goal, the Project's key objectives are:

- Design and construct the project in accordance with current District standards.
- Increase the reliability of the respective branches of the District's sanitary sewer system.
- Reduce the potential for sewer spills.
- Reduce maintenance requirements.

1.8 OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

County of Monterey

- Encroachment Permit
- Coastal Development Permit (exemption)

City of Carmel-by-the-Sea

- Encroachment Permit
- Coastal Development Permit (exemption)

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Chapter 2. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the Proposed Project, involving at least one (1) impact that is a "potentially significant impact," as discussed in the Initial Study analysis on the following pages.

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

Environmental Factors Not Affected

The following environmental resources were considered as part of the scoping and environmental analysis conducted for the Proposed Project. The potential for adverse impacts to these resources as a result of the Proposed Project was not identified. Consequently, there is no further discussion regarding these resources in this document.

Agricultural Resources: The California Department of Conservation (DOC) identifies and designates important farmland throughout the State as part of the Farmland Mapping and Monitoring Program (FMMP). Farmland is classified as follows:

- **Prime Farmland.** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. These are Class I and Class II soils.
- **Farmland of Statewide Importance.** Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Unique Farmland.** Farmland of lesser quality soils used to produce the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climactic zones in California.
- **Grazing Land.** Government Code §65570(b)(3) defines Grazing Land as: "...land on which the existing vegetation, whether grown naturally or through management, is suitable for grazing or browsing of livestock." The minimum mapping unit for Grazing Land is 40 acres. Grazing Land does not include land previously designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance, and heavily brushed, timbered, excessively steep, or rocky lands which restrict the access and movement of livestock.

- **Urban and Built-Up Land.** Land occupied by structures with a building density of at least one (1) unit to 1.5 acres, or approximately six (6) structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
- **Other Land.** Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas, not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded by urban development and greater than 40 acres is mapped as Other Land.

California Public Resources Code §4526 and the California Board of Forestry and Fire Protection define "Timberland" as land not owned by the federal government nor designated as experimental forest land, which is capable of and available for growing any commercial tree species.

The majority of the Proposed Project is located in unincorporated Monterey County between the City and Del Monte Forest, with small areas of the Project crossing into City limits and the boundaries of Del Monte Forest. The entirety of Proposed Project site is classified as “Urban and Built-Up Land,” and the surrounding land uses include:

- North: Open Space – Forest (Del Monte LUP)
- South: Single Family Residential (City’s General Plan/Coastal LUP)
- East: Residential – Medium Density, Public/Quasi-Public
- West: Open Space – Forest (Del Monte LUP)

No commercial agriculture or forestry land is located within or surrounding the Project site (DOC, 2026). The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is the State’s primary program aimed at conserving private land for agricultural use. The Proposed Project is not on or adjacent to any Williamson Act contracted lands (DOC, 2026). The Proposed Project is located near residential areas where no agricultural activities occur. The FMMP designates the Carmel Woods component as “Urban and Built-Up Land,” while the Pescadero Road component is mostly “Urban and Built-Up Land,” with a small area designated as “Other Land” (DOC, 2026). In addition, the Del Monte Forest Area LUP designates both Project areas as “Forest Open Space” (Monterey County, 2012). The Project site is not governed by a contract under the Williamson Act (Monterey County, 2025). CEQA requires the evaluation of forest and timber resources where they are present. The Proposed Project site is surrounded by forest land as defined in Public Resources Code (PRC) Section 12220(g) due to the presence of 10-percent or greater of native tree coverage. The Project site does not include any land designated as timberland as defined by Public Resources Code Section 4526 or timberland zoned Timberland Production as defined by Government Code Section 51104(g).

The Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, to non-agricultural use. No agricultural uses occur on the Proposed Project site and none of these parcels where the Proposed Project would occur are governed under a Williamson Act Contract. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. There would be no other development or construction that would cause changes in the existing environment. The Project would not impact forest land (as defined in Public Resources Code section 12220(g)) as the Project does not include the removal of any native tree species. In addition, the Project site does not contain land

designated as timberland (as defined by Public Resources Code section 4526) or timberland production (as defined by Government Code section 51104(g)), nor is there any land designated as timberland or timberland production in the vicinity of the Proposed Project site. Therefore, no loss of forest land or conversion of forest land to non-forest use would occur as part of the Project. The Project does not include any new land uses that would involve changes to the existing environment or that could result in the conversion of farmland to non-agricultural use or forest land to non-forest use. For these reasons, the Proposed Project would have no impact on agriculture and forestry resources. Therefore, no further discussion is necessary.

Land Use and Planning: The Proposed Project is located in unincorporated Monterey County between the City and Del Monte Forest, which is located in the Coastal Zone. The 1982 Monterey County General Plan, instead of the 2010 Monterey County General Plan, regulates activities within the Coastal Zone in Monterey County. In addition, the Carmel Area LUP provides regulations and polices relevant to the Proposed Project site. The City's General Plan policies may also apply to the portion of the Proposed Project that occurs within City limits, and likewise the Del Monte Forest Area Plan's policies may apply to the portion of the Proposed Project located along the existing Pescadero sewer alignment. The local coastal land use designations for the Project site include Medium Density Residential and Forest Open Space. For specific APNs within the Proposed Project sites, see **Section 1.2, Project Location and Surrounding Uses**. General Plan zoning designations for the Project site include Medium Density Residential (Coastal Zone) (MDR(CZ)), and Resource Conservation (RC(CZ)) (Monterey County, 2026).

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. While residential uses are located to the south and west of the Project site, work would be confined to the Project parcels and would not create a barrier that would divide an established community The Proposed Project would not conflict with policies, goals, and objectives of the 1982 Monterey County General Plan, the Carmel Area LUP, the Del Monte Forest Area LUP, and the City's General Plan. For these reasons, the Proposed Project would have no impact on land use and planning. Therefore, no further discussion is necessary.

Mineral Resources: The Surface Mining and Reclamation Act (SMARA) of 1975 and the California Geological Survey (CGS) define and map regional significant mineral resources. The CGS delineates Mineral Resource Zones (MRZs) based on their mineral resource potential. The Proposed Project is located in MRZ-3, which the CGS defined as an area containing known or inferred construction aggregate resources of undetermined mineral resource significance. The Proposed Project is located in unincorporated Monterey County between the City and Del Monte Forest and is not located in an area reserved or analyzed for future mineral extraction (CGS, 2021). For this reason, the Proposed Project would have no impact on mineral resources. Therefore, no further discussion of mineral resources is necessary.

Population and Housing: The Proposed Project is located within unincorporated Monterey County. The population of unincorporated Monterey County is approximately 105,096 people inhabiting 40,771 residential units within unincorporated areas based on the California Department of Finance's average of 2.54 persons per residential unit (Department of Finance, 2025). The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and does not involve new residential or commercial development that could result in a population increase.

The Proposed Project improvements are intended to replace and rehabilitate the damaged sewer mains at the Pescadero Road and Carmel Woods sites in order to maintain reliable service to the District's customers and minimize the potential for sewer spills in the future, and the Proposed Project does not include any treatment capacity upgrades or extension of wastewater infrastructure into areas that have previously not been part of the District's service area that would indirectly result in population growth. Furthermore, the Proposed Project would not displace existing people or housing. For these reasons, the Proposed Project would have no impact on population and housing. Therefore, no further discussion of population and housing is necessary.

Recreation: There are several parks in the region, including Garland Ranch Regional Park and Cachagua Community Park operated by Monterey Peninsula Regional Parks District (MPRPD), and Carmel State Beach operated by the California Department of Parks and Recreation. Forest Hill Park, also operated by the City, is located about 0.2 miles south of the Pescadero Road Project site and 0.5 miles south of the Carmel Woods Project site. The Mission Trail Nature Preserve, located in and operated by the City, is located approximately 1.5 miles south of the Project site. The Proposed Project is not located on any California Department of Parks and Recreation (State Parks) property (Monterey County, 2026).

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project would not include new development that could introduce new residents to the area that would place additional demand on existing park facilities or require the expansion of existing park facilities or construction of new park facilities. The Proposed Project does not include new recreational facilities or require the construction or expansion of existing recreational facilities that would have an adverse impact on the environment. Therefore, no further discussion of recreational facilities is necessary.

Chapter 3. Determination

On the basis of this initial evaluation:

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

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

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

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

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

Signature | Date

Jeff Bandy, Ph.D., P.E., Principal Engineer

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Chapter 4. Environmental Setting and Impacts

The following chapter assesses the environmental impacts associated with the Proposed Project and identifies mitigation measures to reduce potentially significant impacts to less-than-significant, as appropriate.

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the Project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).
2. All answers must consider the whole action involved, including offsite as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less-than-significant with mitigation, or less-than-significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less-Than-Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-Than-Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were in the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less-than-Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.
6. Lead agencies are encouraged to incorporate information sources for potential impacts (e.g., general plans, zoning ordinances) into the checklist references. Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

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

4.1 Aesthetics

Environmental Setting

The Proposed Project is located in the Coastal Zone, primarily within unincorporated Monterey County. The City is located to the south of the Project site, and Del Monte Forest is located to the northwest. A small portion of the Pescadero Sewer Project component is located within the City's limits. The overall Project site is located in a residential area east of 17 Mile Drive. Portions of the Pescadero Road Project site and the Carmel Woods Project site are located in a "Sensitive" visual area, according to the County's GIS Web Viewer (Monterey County, 2026). The Carmel Woods Project site also borders a "Highly Sensitive" visual area that follows SR 1 northbound. SR 1 is designated as a State Scenic Highway by the California Department of Transportation (Caltrans, 2026); however, the Proposed Project would not involve work within or affect views of or from SR 1. Once the Proposed Project is complete, all Project components would be located at or below ground level.

Regulatory Framework

State

***California Scenic Highways Program*:** The Legislature created the California State Scenic Highway program in 1963. This program's purpose is to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. The program includes a list of highways that are either designated or eligible for designation as a scenic highway. The state laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. In Monterey County, the closest officially designated State Scenic Highway is the portion of SR 1 located immediately east of the Proposed Project (Caltrans, 2026). SR 1 is approximately 0.15 miles from the Carmel Woods Project site and approximately 0.6 miles from the Pescadero Road Project site.

Local

***1982 Monterey County General Plan*:** The 1982 Monterey County General Plan includes goals and policies related to the preservation of visual integrity. The following goal from the 1982 Monterey County General Plan may apply to the Proposed Project:

Goal 1: To retain the character and natural beauty of Monterey County by the preservation, conservation, and maintenance of open space within constitutional constraints.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the preservation of visual integrity. The following policies from the Carmel Area LUP may apply to the Proposed Project:

2.2.3.1: The design and siting of structures, whether residential, commercial, agricultural, or public, and the access roads thereto, shall not detract from the natural beauty of the scenic shoreline and the undeveloped ridgelines and slopes in the public viewshed.

2.2.3.6: Structures shall be subordinate to and blended into the environment, using appropriate materials that that effect. Where necessary, modification of plans shall be required for siting, structural design, color, texture, building materials, access, and screening.

5.3.2.4: Existing visual access from scenic viewing corridors (e.g., Highway 1, Scenic Road, Spindrift Road, Yankee Point Drive) and from major public viewpoints, and future opportunities for visual access from the frontal ridges east of Highway 1 should be permanently protected as an important component of shoreline access and public recreational use.

City's General Plan: The City's General Plan includes goals and policies related to the preservation of visual integrity. The following policy from the City's General Plan may apply to the Proposed Project:

P5-95: Recognize the City's narrow street paving, roadside vegetation and overarching canopy as important elements contributing to the streetscape, pedestrian circulation, traffic calming, community aesthetics and environmental enhancement. Identify character defining features of roadways and retain and enhance these features when planning and implementing street improvements, repairs and reconstructions. (LUP)

Del Monte Forest Area LUP: The Del Monte Forest Area LUP includes policies related to scenic and visual resources. The following policies from the Del Monte Forest Area LUP may apply to the Proposed Project:

47. Views from designated public access areas and vista points, from Highway 68 and 17-Mile Drive corridors, and of ridgelines as seen from the public viewing areas identified on Figure 3, shall be protected as resources of public importance, and development that could adversely impact such views shall only be allowed where it protects, preserves, and if feasible enhances, such scenic resources. Conservation and scenic easements shall be required as one means of protecting such views in perpetuity.

50. Utility lines shall be placed underground, typically within road access footprints, except where 1) such undergrounding would result in removal of native trees and 2) it can be shown that the lines can be hidden from public view using different siting and design approaches (e.g., placing lines behind existing vegetation or structures, etc.).

53. Design and siting of structures in public views of scenic areas should not detract from scenic values of the forest, stream courses, ridgelines, or shoreline. Structures, including fences, shall be subordinate to and blended into the environment, including by using appropriate materials that will achieve that effect. Where necessary, modifications shall be required for siting, structural design, shape, lighting, color, texture, building materials, access, and screening to protect such public views.

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 in a state scenic highway?	☐	☐	■	☐
c)	In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the	☐	☐	■	☐

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
project conflict with applicable zoning and other regulations governing scenic quality?				
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	■	☐

Impact Discussion

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

Portions of the Pescadero Road and Carmel Woods Project sites are both located within parcels designated by the County of Monterey as being visually sensitive (Monterey County, 2026). Additionally, the Carmel Woods Project site also borders a "Highly Sensitive" visual area that follows SR 1. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. Construction of the Proposed Project would result in temporary visual impacts; however, construction equipment visible from views of a scenic vista would be removed following completion of the Proposed Project. Once completed, the Proposed Project components would be located underground and would not be visible from adjacent land uses. Therefore, the Proposed Project would have a less-than-significant impact related to views on or from scenic vistas.

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

The Carmel Woods component of the Proposed Project is located immediately west of SR 1, while the Pescadero Road component is located approximately 2,800 feet west of SR 1 (Google, 2026), which is designated as a State Scenic Highway (Caltrans, 2026). The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. Construction of the Proposed Project would result in temporary visual impacts from a scenic highway; however, construction equipment visible from views of the adjacent scenic highway would be removed following completion of the Proposed Project. In addition, construction of the Proposed Project would not damage any scenic resources. Once completed, the Proposed Project components would be located underground and would not be visible from the adjacent scenic highway. Therefore, the Project would have a less-than-significant impact related to substantially damaging scenic resources visible from a designated state scenic highway.

c. Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Proposed Project is located in a residential area, which is considered an urbanized area (Monterey County, 2026). The portion of the Proposed Project located in unincorporated Monterey County is zoned as Medium Density Residential (Coastal Zone) (MDR-CZ) and Resource Conservation (Coastal Zone) (RC-

CZ). The Project is a conditional allowable use (subject to a Coastal Development Permit) for the MDR-CZ zoning type pursuant to 20.12.050[D] and 20.36.050[B] of the MCC. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. Project construction would not conflict with zoning or other designations since it involves the improvement of a utility within a residential area. Construction of the Proposed Project may result in temporary impacts to the visual character on the site due to the presence of construction equipment and ongoing pipeline installation; however, construction would not conflict with applicable zoning or other regulations governing scenic quality. Therefore, the Proposed Project represents a less-than-significant impact with regard to conflicts with applicable zoning and other regulations governing scenic quality.

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

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project may introduce temporary glare from construction equipment during daytime construction, which could temporarily affect daytime views of the area. Construction equipment would be stored at designated laydown areas that would be sited, in part, to avoid substantial glare from surrounding viewpoints. Furthermore, all construction equipment would be removed from the Project sites following completion of construction, and no permanent new sources of glare would be installed as part of the Project. No nighttime construction is proposed, and therefore, the Proposed Project would not be a source of nighttime lighting. Once operational, the Proposed Project would be located underground and would not be a significant source of light or glare. For these reasons, the Proposed Project would have a less-than-significant impact regarding light and glare.

4.2 Air Quality

Environmental Setting

The Proposed Project is in the North Central Coast Air Basin (NCCAB), which encompasses Santa Cruz, San Benito, and Monterey counties. The NCCAB is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). MBARD is responsible for producing an Air Quality Management Plan (AQMP) that reports air quality and regulates stationary air pollution sources throughout the NCCAB. MBARD is also responsible for measuring the concentration of pollutants and comparing those concentrations against the Ambient Air Quality Standards (AAQS). AAQS establish levels of air quality maintenance required to protect the public from the adverse effects of air pollution and are established for “criteria air pollutants,” which include ozone, carbon monoxide, particulate matter less than 10 microns in diameter, particulate matter less than 2.5 microns in diameter, nitrogen dioxide, sulfur dioxide, and lead. MBARD is responsible for monitoring criteria pollutants to determine whether they are in attainment or not in attainment with the AQMP. **Table 2** illustrates the attainment status for criteria pollutants in the NCCAB.

Table 2
Attainment Status for the NCCAB

Pollutants	State Designation	Federal Designation
Ozone (O_3)	Attainment	Attainment
Inhalable Particulates (PM_{10})	Nonattainment	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Attainment
Carbon Monoxide (CO)	Monterey Co. – Attainment	Attainment
Carbon Monoxide (CO)	San Benito Co. – Unclassified	Attainment
Carbon Monoxide (CO)	Santa Cruz Co. – Unclassified	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Attainment

Source: Monterey Bay Air Resources District, 2017. 2012 – 2015 Air Quality Management Plan

MBARD has set air quality thresholds of significance for the evaluation of projects. **Table 3** illustrates the thresholds of significance used to determine if a project would have a significant air quality effect during implementation. In addition to these thresholds, MBARD has also determined a significant short-term construction generated impact would occur if more than 2.2 acres of major grading or excavation, or 8.1 acres of minimal earthmoving per day was to occur (MBARD, 2008).

Table 3
Thresholds of Significance for Project Emissions

Pollutant	Threshold of Significance (lb./day)
Nitrogen Oxides (NO_x)	173
Reactive Organic Gases (ROG)	137
Respirable Particular Matter (PM_{10})	82
Fine Particulate Matter ($PM_{2.5}$)	55
Carbon Monoxide (CO)	550

Source: MBARD, 2016.

The California Air Resources Board (CARB) defines a sensitive receptor as children, elderly, asthmatic, and others who are at elevated risk of negative health outcomes due to exposure to air pollution (CARB, 2023). Pursuant to California Health and Safety Code Sec. 42705.5, examples of a sensitive receptor include hospitals, schools, and daycare centers. MBARD similarly defines sensitive receptors and requires any explanation of sensitive receptors to draw a relationship to the Proposed Project site and potential air quality impacts (MBARD, 2008). Sensitive receptors are more susceptible to the effects of air pollution than the general population. Land uses that are considered sensitive receptors include residences, schools, and health care facilities. Sensitive receptors in the vicinity of the Proposed Project area consist primarily of residences.

Air quality modeling was conducted by AMBIENT (**Appendix B**) for total mitigated and unmitigated projected emissions of criteria air pollutants for construction work completed during 2026 and 2027. For the purposes of this analysis, unmitigated emissions were used in the impact analysis below to prevent a conservative analysis of construction air quality emissions.

Common sources of odors and odor complaints include wastewater treatment plants, transfer stations, coffee roasters, painting/coating operations, and landfills. Due to potential odor concerns from the sewer main construction, V&A Consulting Engineers completed a Sewer Odor Evaluation for the

Pescadero Road Project component (V&A Consulting Engineers, 2024). A copy of the Sewer Odor Evaluation is provided as **Appendix C** to this document. (V&A Consulting Engineers, 2024)

Climate and Topography

Climatological conditions, an area's topography, and the quantity and type of pollutants released commonly determine ambient air quality. The NCCAB covers an area of 5,159 square miles along the Central Coast. The northwest sector of the NCCAB is dominated by the Santa Cruz Mountains. The Diablo Range marks the northeastern boundary of the basin. The Santa Clara Valley extends into the northeastern tip of the basin. Further south, the Santa Clara Valley becomes the San Benito Valley, which runs northwest-southeast, with the Gabilan Range as its western boundary. To the west of the Gabilan Range is the Salinas Valley, which extends from Salinas at the northwest end to south of King City. The coastal Santa Lucia Range defines the western side of the valley.

Climate, or the average weather condition, affects air quality in several ways. Wind patterns can remove or add air pollutants emitted by either stationary or mobile sources. Inversion, a condition where warm air traps cooler air underneath it, can hold pollutants near the ground by limiting upward mixing (dilution). Communities with cold climates may burn wood or other fuels for residential heating, whereas areas with hot climates may have higher emissions or some pollutants from automobiles. Topography also plays a part, and valleys often trap emissions by limiting lateral dispersal.

Regulatory Framework

Federal

***U.S. Environmental Protection Agency (EPA)*:** At the federal level, the U.S. EPA implements national air quality programs. The Federal Clean Air Act (FCAA), signed in 1970, provides air quality mandates used by the U.S. EPA. Congress amended the FCAA in 1977 and again in 1990.

***Federal Clean Air Act*:** The FCAA required the U.S. EPA to establish National Ambient Air Quality Standards (NAAQS) and set deadlines for their attainment. Two (2) types of NAAQS exist: primary standards, which protect public health, and secondary standards, which protect public welfare from non-health-related adverse effects, such as visibility restrictions. The FCAA allows states to adopt additional or more health-protective standards.

Pursuant to California Clean Air Act (CCAA) and CCAA amendments, a region must participate in the State Implementation Plan if the state designates it as a maintenance region. The most recent Federal Plan prepared by MBARD to maintain the 1-hour ozone NAAQS is the 2007 Federal Maintenance Plan for Maintaining the National Ozone Standard in the Monterey Bay Region and adopted rules and regulations.

State

***California Air Resources Board*:** CARB is the agency responsible for coordinating and overseeing state and local air pollution control programs in California and implementing the CCAA of 1988. Other CARB duties include monitoring air quality (in conjunction with air monitoring networks maintained by air pollution control districts and air quality management districts, establishing California Ambient Air

Quality Standards (CAAQS), which in many cases are more stringent than the NAAQS, and setting emissions standards for new motor vehicles.[1]

***California Clean Air Act*:** The CCAA requires all air districts in the state to endeavor to achieve and maintain CAAQS for Ozone, CO, SO_2, and NO_2 by the earliest practical date. The CCAA specifies that districts focus particular attention on reducing emissions from transportation and area-wide emission sources, and the Act provides districts with authority to regulate indirect sources of emissions. Each district plan is required to either: 1) achieve a five (5) percent annual reduction, averaged over consecutive three (3)-year periods, in district-wide emissions of each nonattainment pollutant or its precursors; or 2) provide for the implementation of all feasible measures to reduce emissions. Any planning effort for air quality attainment would thus need to consider both state and federal planning requirements.

Local

***Monterey Bay Air Resources District*:** MBARD is the agency primarily responsible for ensuring that NAAQS and CAAQS are not exceeded and that air quality conditions are maintained in the NCCAB. Responsibilities of the MBARD include, but are not limited to, preparing plans for the attainment of ambient air quality standards, adopting, and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, inspecting stationary sources of air pollution, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations required by the FCAA and the CCAA. To achieve NAAQS and CAAQS and maintain air quality, the MBARD has most recently completed the 2012-2015 AQMP for achieving the state ozone standards and the 2007 Federal Maintenance Plan for maintaining federal ozone standards (MBARD, 2017).

***1982 Monterey County General Plan*:** None of the policies provided by the 1982 Monterey County General Plan related to air quality are applicable to portions of the Proposed Project.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the regulation of air quality. None of the air quality-related goals from the Carmel Area LUP may apply to the Proposed Project.

City's General Plan: The City's General Plan includes goals and policies related to the regulation of air quality. The following policies from the City's General Plan may apply to the Proposed Project:

G7-3: To reduce release of airborne pollutants and contribution to greenhouse gases.

O7-3: Promote planning and programs that result in the reduction of airborne pollutants.

P7-9: Coordinate air quality planning efforts with local, regional, and State agencies, and evaluate the air quality impacts of proposed plans and development projects.

Del Monte Forest Area LUP: The Del Monte Forest Area LUP does not include policies related to air quality resources.

[1] The emission standards established for motor vehicles differ depending on various factors including the model year, and the type of vehicle, fuel, and engine used.

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

Impact Discussion

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

CEQA Guidelines Section 15125(b) requires that a project be evaluated for consistency with applicable regional plans, including the AQMP. The most recent AQMP update was approved in March 2017. This plan addresses attainment of the State ozone standards and federal air quality standards. The AQMP accommodates growth by projecting growth in emissions based on population forecasts prepared by the Association of Monterey Bay Area Governments (AMBAG). Consistency determinations are issued for commercial, industrial, residential, and infrastructure-related projects that have the potential to induce population growth. A project is considered to be inconsistent with the AQMP if it has not been accommodated in the forecast projections considered in the AQMP.

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. No significant overall changes to the overall operation of CAWD's wastewater collection system are included under the Project. The Proposed Project is an alteration to an existing facility and would not facilitate additional development or growth that could exceed AMBAG population forecasts or result in growth that was unaccounted for in population forecast contained in MBARD's AQMP. The majority of the parcels in the area surrounding the Project site are currently developed. Therefore, the Proposed Project would not result in indirect population increases through expanding CAWD's wastewater service area and would not conflict with and/or otherwise obstruct implementation of the AQMP. For these reasons, the Project would have a less-than-significant impact with regard to conflicting with or otherwise obstructing implementation of the AQMP.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The MBARD 2016 CEQA Air Quality Guidelines contain standards of significance for evaluating potential air quality effects of projects subject to the requirements of CEQA. According to MBARD, a project

would violate an air quality standard and/or contribute to an existing or projected violation if it would emit (from all sources, including exhaust and fugitive dust) more than:

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

AMBIENT performed detailed air quality modeling for the Proposed Project based on information provided by CAWD and their engineering consultant. The Air Quality & Greenhouse Gas modeling results are provided as **Appendix B** and the results of the modeling are discussed below. **Table 4** shows the projected emissions of criteria air pollutants from construction of the Proposed Project compared to the established MBARD thresholds.

Table 4
Construction Emissions of Criteria Air Pollutants (lbs./day)

Category/Condition	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions:	1.0	8.03	11.72	0.02	0.77	0.52
MBARD Significance Threshold:	137	137	550	150	82	55
Exceeds Threshold/Significant Impact?	No	No	No	No	No	No

Source: **Appendix B**

Construction of the Proposed Project would result in temporary emissions of criteria air quality pollutants. However, as shown in **Table 4**, construction emissions of criteria air quality pollutants would be below each of the respective MBARD thresholds for each pollutant. As a result, the Proposed Project would have a less-than-significant impact from the release of air quality pollutants during construction of the Proposed Project.

Operational emissions of the Proposed Project were not analyzed in detail as the Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project does not propose new above ground structures requiring daily operation, and the operational activities associated with the Proposed Project would be identical to existing conditions at the Project site. Furthermore, the maintenance schedule for the replacement sewer is anticipated to be less frequent than under existing conditions. As a result, the Proposed Project would have no impact from the release of air quality pollutants during operation.

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

A "sensitive receptor" is generally defined as: any residence including private homes, condominiums, apartments, or living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. Sensitive receptors near the Project components include residences directly adjacent to the roadways where construction would occur, as well as the parcels identified by the APNs in **Table 1**. The closest school is the Stevenson Lower and Middle School, which is located adjacent to the Pescadero Road site and 0.5 miles from the Carmel Woods site. The next closest school is Carmel High School, which is one (1) mile away from the Proposed Project sites. The Community Hospital of the

Monterey Peninsula is located approximately 0.6 miles from the Carmel Woods site and one (1) mile from the Pescadero Road site. There are no day care centers within or adjacent to the Project site. The Proposed Project would result in limited earth disturbance associated with utility line installation, as well as any segments of utility lines to be removed. The Proposed Project includes approximately 6,800 sf (0.16 acres) of grading and 10,800 sf (0.25 acres) of total soil disturbance, which could generate pollutant concentrations. However, given that the projected air quality emissions from Project construction would be below their respective MBARD thresholds, as well as the distance from the nearest sensitive receptors and the linear nature of the Proposed Project, impacts to these receptors would be less-than-significant. In addition, the Proposed Project would comply with MBARD Rule 402,[2] which would minimize potential nuisance impacts to occupants of nearby land uses. The Proposed Project would have a less-than-significant impact with respect to exposing sensitive receptors to substantial pollutant concentrations.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Odors could be generated during Project implementation. Both components of the Proposed Project may require the use of gasoline or diesel-powered equipment during construction that would emit exhaust fumes, including vehicle trips to and from the Project site. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly within increasing distance from the source. In addition, work tasks would be located along the proposed utility alignment and would not be concentrated in single locations for extended periods of time. As a result, short-term construction activities would not expose a substantial number of people to frequent odorous emissions.

V&A Consulting Engineers completed a Sewer Odor Evaluation for the Pescadero Road site (**Appendix C**). Their analysis concluded that there were non-detectible or negligible concentrations of hydrogen sulfide within the collection system on Pescadero Road. All samples for other potentially odorous compounds were also non-detectible. Since the replaced Pescadero Road sewer main would begin and terminate at the same starting and ending elevations as the current sewer, and there would be no changes to the flow sources or configuration, no significant changes in wastewater characteristics, pressure conditions, or current odor conditions are expected from the Project. The Project does not include any significant overall changes to CAWD's wastewater collection system that could result in new permanent sources of objectionable odor or other emissions. In addition, the Proposed Project would be located underground once operational and would not generate new or increased odors or other emissions.

The replacement sewer lines for the Carmel Woods Project site do not include any significant overall changes to CAWD's wastewater collection system (i.e. changes in location closer to sensitive odor receptors) that could result in new permanent sources of objectionable odor or other emissions. In addition, the Proposed Project would be located underground once operational and would not generate new or increased odors or other emissions. Therefore, the Proposed Project would have a less-than-significant impact related to the generation of odors and other emissions.

[2] MBARD Rule 402 "Nuisance" states, "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals."

4.3 Biological Resources

Denise Duffy & Associates, Inc. (DD&A) was contracted by MNS Engineers, Inc. to prepare a Biological Resources Report for the Proposed Project (February 2026). The Biological Resources Report is included as **Appendix D** of this document.

Terminology

Special-Status Species

Special-status species are those plants and animals that have been formally listed or proposed for listing as endangered or threatened or are candidates for such listing under ESA or CESA. Listed species are afforded legal protection under the ESA and CESA. Species that meet the definition of rare or endangered under the CEQA Guidelines Section 15380 are also considered special-status species. Animals on the CDFW's list of "species of special concern" (most of which are species whose breeding populations in California may face extirpation if current population trends continue) meet this definition and are typically provided management consideration through the CEQA process, although they are not legally protected under the ESA or CESA. CDFW also includes some animal species that are not assigned any of the other status designations in the CNDDB "Special Animals" list; however, these species have no legal or protection status and are not analyzed in this document.

Plants listed as rare under the California Native Plant Protection Act (CNPPA) or included in CNPS California Rare Plant Ranks (CRPR; formerly known as CNPS Lists) 1A, 1B, 2A, and 2B are also treated as special-status species as they meet the definitions of Sections 2062 and 2067 of the CESA and in accordance with CEQA Guidelines Section 15380.2 In general, the CDFW requires that plant species on CRPR 1A (plants presumed extirpated in California and either rare or extinct elsewhere), CRPR 1B (plants rare, threatened, or endangered in California and elsewhere), CRPR 2A (plants presumed extirpated in California, but more common elsewhere); and CRPR 2B (plants rare, threatened, or endangered in California, but more common elsewhere) of the CNPS Inventory of Rare and Endangered Vascular Plants of California (CNPS, 2026) be fully considered during the preparation of environmental documents relating to CEQA. CNPS CRPR 4 species (plants of limited distribution) may, but generally do not, meet the definitions of Sections 2062 and 2067 of CESA, and are not typically considered in environmental documents relating to CEQA. While other species (i.e., CRPR 3 or 4 species) are sometimes found in database searches or within the literature, these do not meet the definitions of Section 2062 and 2067 of CESA and are not analyzed in this document.

Raptors (e.g., eagles, hawks, and owls) and their nests are protected under California Fish and Game Code Section 3503.5. Section 3503.5 states that it is "unlawful to take, possess, or destroy the nest or eggs of any such bird except otherwise provided by this code or any regulation adopted pursuant thereto." In addition, protected species under Fish and Game Code Section 3511 (birds), Section 4700 (mammals), Section 5515 (fish), and Section 5050 (reptiles and amphibians) are also considered special-status animal species. Species with no formal special-status designation but thought by experts to be rare or in serious decline may also be considered special-status animal species in some cases, depending on project-specific analysis and relevant, localized conservation needs or precedence.

Sensitive Habitats

Sensitive habitats include riparian corridors, wetlands, habitats for legally protected species, areas of high biological diversity, areas supporting rare or special-status wildlife habitat, and unusual or regionally restricted vegetation types. Vegetation types considered sensitive include those listed on CDFW's California Natural Communities List (i.e., those habitats that are rare or endangered within the borders of California) (CDFW, 2025), those that are occupied by species listed under the ESA or are critical habitat in accordance with the ESA, and those that are defined as Environmentally Sensitive Habitat Areas (ESHA) under the California Coastal Act. Specific habitats may also be identified as sensitive in city or county general plans or ordinances. Sensitive habitats are regulated under federal regulations (such as the Clean Water Act and Executive Order 11990 – Protection of Wetlands), state regulations (such as CEQA and the CDFW Streambed Alteration Program), or local ordinances or policies (such as city or county tree ordinances and general plan policies).

Environmental Setting

Survey Methodology

DD&A conducted biological surveys of the Project site on January 28 and February 11, 2016. Survey methods included walking the project site using aerial maps to identify general habitat types and potential sensitive habitats, assessing the potential presence of wetlands and other waters, conducting a focused survey for special-status plants or habitat for special-status plants, and conducting a reconnaissance-level habitat survey to identify any suitable special-status wildlife species occurring within the site. Additional surveys were conducted on June 27, 2022, by Josh Harwayne and DD&A Associate Environmental Scientist Liz Camilo, and March 4, 2026, by Assistant Environmental Scientist Jordan Smith, to confirm or update the results of 2016 surveys. Data collected during the surveys was used to assess the environmental conditions of the project site and its surroundings, evaluate environmental constraints within the Project site and the local vicinity, and provide a basis for recommendations to minimize and avoid impacts to biological resources.

Habitat Types

Descriptions of each of the habitat types identified by DD&A within the Project site are provided below.

Developed: The Project site is mostly developed with paved roads. A small section of developed habitat within the Project site is landscaped. However, generally no vegetation is present within developed areas, and they are considered to have little to no biological value. Approximately 1.5 acres of developed areas occur within the Pescadero portion of the Project site. The majority of the Carmel Woods portion of the Proposed Project is located within developed roadways and landscaped residential lots totaling approximately 6.5 acres of developed habitat.

- *A Manual of California Vegetation classification:* None
- *California Natural Communities List:* Not listed

Degraded Monterey Pine Forest: The degraded Monterey pine forest consists of a moderate- to closed-canopy natural community dominated by Monterey pine, but also supports coast live oak and poison oak (*Toxicodendron diversilobum*). Within the Project site, degraded Monterey pine forest occurs throughout interspersed with the residential area. In addition to poison oak, the dominant species in the

understory are horticultural species that likely escaped from adjacent properties and non-native grasses and forbs, including rattlesnake grass (*Briza maxima*), cape ivy (*Delairea odorata*), panic veldtgrass (*Ehrharta erecta*), Bermuda buttercup (*Oxalis per-caprae*), hedgenettle (*Stachys sp.*). Approximately 0.8 acres of degraded Monterey pine forest is present within the Pescadero Road portion of the Project site, and approximately 0.12 acres of degraded Monterey pine forest is located within the Carmel Woods portion. Two Monterey pine trees would be removed from a developed area to facilitate site access.

Due to relatively short life span of closed-cone pines, dead trees and trunks are characteristic of Monterey pine forests. These attract a wide variety of common wildlife, including mule deer (*Odocoileus hemionus*), raccoon (*Procyon lotor*), red-tailed hawk (*Buteo jamaicensis*), scrub jay (*Aphelocoma californica*), chestnut-backed chickadee (*Poecile rufescens*), and American robin (*Turdus migratorius*).

- *A Manual of California Vegetation classification:* Monterey pine forest *(Pinus radiata – Quercus agrifolia/Toxicodendron diversilobum* association)
- *California Natural Communities List:* Sensitive

Special-Status Species

Published occurrence data within the Project site and surrounding quadrangles were evaluated to compile a table of special-status species known to occur in the vicinity of the Project site. Each of these species was evaluated for their likelihood to occur within and immediately adjacent to the Project site. The special-status species that are known to occur within the Project site or that were determined to have a moderate or high potential to occur within the site are discussed below. All other species are assumed unlikely to occur or have a low potential to occur based on the species-specific reasons presented in the Biological Resources Report (**Appendix D**), are therefore unlikely to be impacted by the Project, and are not discussed further. Each of these species was evaluated for their likelihood to occur within and immediately adjacent to the site, as described below.

Monterey Pine: Monterey pine is a CNPS List 1B species in the Pinaceae family. This evergreen tree occurs in closed-cone coniferous forests at elevations from 25 to 185 meters. Only four native stands of this species exist in the world. One stand is found on Guadalupe Island off Baja California. The other three stands are all within California at Ano Nuevo, Cambria, and the Monterey Peninsula. Monterey pines are introduced in many areas, including in New Zealand, where it is used as a plantation crop. Only one-half of the species' historical extent remains undeveloped on the Monterey Peninsula. Monterey pines are threatened by development, genetic contamination, pine pitch canker disease, and forest fragmentation, especially in the Del Monte Forest on the Monterey Peninsula. Monterey pine individuals are present within the Project site, which is located in one of the few remaining native stands of this species.

Monterey Dusky-Footed Woodrat (MDFW): The Monterey dusky-footed woodrat (*Neotoma macrotis luciana*) is a CDFW species of special concern. This is a subspecies of the dusky-footed woodrat (*Neotoma macrotis*), which is common to oak woodlands and other forest types throughout California. Dusky-footed woodrats are frequently found in forest habitats with moderate canopy cover and a moderate to dense understory, including riparian forests; however, they may also be found in chaparral communities. Relatively large nests are constructed of grass, leaves, sticks, and feathers and are built in protected spots, such as rocky outcrops or dense brambles of blackberry and/or poison oak. Typical food sources for this species include leaves, flowers, nuts, berries, and truffles. Dusky-footed woodrats may be a significant food source for small- to medium-sized predators. Populations of this species may be

limited by the availability of nest material. Within suitable habitat, nests are often found in close proximity to each other.

Suitable habitat for MDFW is present within and adjacent to both Project sites in the degraded Monterey pine forest habitat. The CNDDB does not report any occurrences of this species within the quadrangles reviewed; however, this species is known to occur throughout the region wherever suitable habitat occurs. Therefore, this species has a moderate potential to occur within the Proposed Project sites.

Raptors and Other Protected Avian Species: Raptors, their nests, and other nesting birds are protected under California Fish and Game Code and Migratory Bird Treaty Act. In addition, some avian species are protected as special-status species (see Appendix C of **Appendix D**). While the life histories of these species vary, overlapping nesting and foraging similarities allow for their concurrent discussion. Most raptors are breeding residents throughout most of the wooded portions of the state. Stands of live oak, riparian deciduous, or other forest habitats, as well as open grasslands, are used most frequently for nesting. Breeding occurs February through September, with peak activity May through July. Prey for these species include small birds, small mammals, and some reptiles and amphibians. Many raptor species hunt in open woodland and habitat edges.

Various species of raptors, including the white-tailed kite (*Elanus leucurus*), red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), American kestrel (*Falco sparverius*), great horned owl (*Bubo virginianus*), and turkey vulture (*Cathartes aura*), have a potential to nest within the large trees present within and adjacent to both Project sites.

Sensitive Habitats

Sensitive habitats include riparian corridors, wetlands, habitats for legally protected species, areas of high biological diversity, areas supporting rare or special-status wildlife habitat, and unusual or regionally restricted vegetation types. Vegetation types considered sensitive include those listed on CDFW's California Natural Communities List (i.e., those habitats that are rare or endangered within the borders of California) (CDFW, 2025), those that are occupied by species listed under the ESA or are critical habitat in accordance with the ESA, and those that are defined as Environmentally Sensitive Habitat Areas (ESHA) under the California Coastal Act. Specific habitats may also be identified as sensitive in city or county general plans or ordinances. Sensitive habitats are regulated under federal regulations (such as the Clean Water Act and Executive Order 11990 – Protection of Wetlands), state regulations (such as CEQA and the CDFW Streambed Alteration Program), or local ordinances or policies (such as city or county tree ordinances and general plan policies). Sensitive habitat types within the Project site are discussed below.

Potential Wetlands of the U.S. and/or State: Areas supporting hydrophytic vegetation and which may be considered wetlands of the U.S. and/or state were identified within and adjacent to the Pescadero Road Project site during biological surveys in 2016 and 2022. Specifically, potential wetlands were identified within Pescadero Canyon adjacent to and just north of Manhole N607. Another potential wetland was identified within a roadside drainage ditch that was constructed by the County, which directly borders Pescadero Road on its eastern, up-slope side near the Stevenson Lower and Middle School. This drainage ditch does not perform as designed due to lack of maintenance, and the Proposed Project includes grading of this ditch to its original design to reestablish effective roadway drainage following completion of the Proposed Project. Impacts to these resources may be subject to the

jurisdiction of the ACOE and/or the RWQCB under Sections 404 and/or 401 of the CWA. In addition, the wetlands within and adjacent to the Project site may also be considered ESHA and, therefore, may be subject to the City's jurisdiction under the City's General Plan/LUP. Potential wetlands were not observed within the boundaries of the Del Monte Forest LUP.

Protected Trees: The Monterey pine forest vegetation alliance occurring within the Project site is considered sensitive under CDFW's California Natural Communities List (CDFW, 2025). Within the City's General Plan/LUP and Monterey County Carmel Area and Del Monte Forest LUPs, Monterey pine forest is considered ESHA under the CCA. The LUPs prohibit development within this habitat unless the development is coastal dependent and would not have a significant effect on the resource.

Large native trees, including Monterey pine and coast live oak, occur within the Project sites. For trees whose canopies fall over the road rights-of-way, tree trimming may be required to facilitate construction activities. Two Monterey pine trees would be removed at the Pescadero Road Project component to facilitate construction access (see **Appendix A,** Sheets C-2 and C-3). No additional tree removal is proposed as part of the Project. Any required tree replacement or mitigation would be implemented consistent with local ordinances, as applicable.

Regulatory Environment

Federal

***Federal Endangered Species Act*:** Provisions of the ESA of 1973 (16 USC 1532 et seq., as amended) protect federally listed threatened or endangered species and their habitats from unlawful take. Listed species include those for which proposed and final rules are published in the Federal Register. The ESA is administered by the U.S. Fish and Wildlife Service (Service) or National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS). In general, NMFS is responsible for the protection of ESA-listed marine species and anadromous fish, whereas other listed species are under Service's jurisdiction.

Section 9 of ESA prohibits the take of any fish or wildlife species listed under ESA as endangered or threatened. Take, as defined by ESA, is "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." The ESA defines harm as "any act that kills or injures the fish or wildlife…including significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife." Additionally, Section 9 prohibits removing, digging up, and maliciously damaging or destroying federally listed plants on sites under federal jurisdiction. Section 9 does not prohibit the take of federally listed plants on sites not under federal jurisdiction. If there is the potential for incidental take of a federally listed fish or wildlife species, take of listed species can be authorized through either the Section 7 consultation process for federal actions or a Section 10 incidental take permit process for non-federal actions. Federal agency actions include activities on federal land, conducted by a federal agency, funded by a federal agency, or authorized by a federal agency (including issuance of federal permits).

***Migratory Bird Act*.** The Migratory Bird Treaty Act (MBTA) of 1918 prohibits killing, possessing, or trading migratory birds except in accordance with regulation prescribed by the Secretary of the Interior. Most actions that result in permanent or temporary possession of a protected species constitute violations of the MBTA. The Service is responsible for overseeing compliance with the MBTA and implements Conventions (treaties) between the United States and four countries—Canada, Mexico,

Japan, and Russia—for the protection of migratory birds. The Service maintains a list of migratory bird species that are protected under the MBTA.

***Clean Water Act*.** The U.S. Army Corps of Engineers (USACE) and U.S. EPA regulate discharge of dredged and fill material into waters of the U.S. under Section 404 of the Clean Water Act (CWA). Waters of the U.S. are defined broadly as waters susceptible to use in commerce (including waters subject to tides, interstate waters, and interstate wetlands) and other waters (such as interstate lakes, rivers, streams, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds) (33 Code of Federal Regulations [CFR] 328.3). Potential wetland areas are identified as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soils conditions."

Under Section 401 of the CWA, any applicant receiving a Section 404 permit from the USACE must also obtain a Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB). A Section 401 Water Quality Certification is issued when a project is demonstrated to comply with state water quality standards and other aquatic resource protection requirements.

State

***California Endangered Species Act*:** The CESA was enacted in 1984. The CCR (Title 14, §670.5) lists animal species considered endangered or threatened by the State. Section 2090 of CESA requires State agencies to comply with endangered species protection and recovery and to promote conservation of these species. Section 2080 of the Fish and Game Code prohibits "take" of any species the commission determines to be an endangered species or a threatened species. Section 86 of the Fish and Game Code defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Section 2081 of the Fish and Game Code concerns Incidental Take Permits from the CDFW, which may be obtained to authorize "take" of any State listed species.

***California Native Plant Protection Act*:** The CNPPA of 1977 directed CDFW to conduct the legislature's intent to "preserve, protect and enhance rare and Endangered plants in the State." The CNPPA prohibits importing rare and Endangered plants into California, taking rare and Endangered plants, and selling rare and Endangered plants. The CESA and CNPPA authorized the Fish and Game Commission to designate endangered, threatened, and rare species and to regulate the taking of these species (Section 2050-2098, Fish and Game Code). Plants listed as rare under the CNPPA are not protected under CESA; however, these plants may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research.

***California Fish and Game Code*:** Section 3503 of the Fish and Game Code states that it is "unlawful to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Section 3503.5 prohibits the killing, possession, or destruction of any birds in the orders Falconiformes or Strigiformes (birds-of-prey). Section 3511 prohibits the take or possession of fully protected birds. Section 3513 prohibits the take or possession of any migratory nongame birds designated under the federal MBTA. Section 3800 prohibits the take of nongame birds.

The classification of Fully Protected was the state's initial effort in the 1960s to identify and provide additional protection to those animals that were rare or faced extinction. Lists were created for fish

(Section 5515), mammals (Section 4700), amphibians and reptiles (Section 5050), and birds (Section 3511). Most Fully Protected species have also been listed as threatened or endangered species under the more recent endangered species laws and regulations. Fully Protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

The CDFW also maintains a list of wildlife "species of special concern." Although these species have no legal status, the CDFW recommends considering these species during analysis of Project impacts to protect declining populations and avoid the need to list them as endangered in the future.

***Porter-Cologne Water Quality Control Act*:** The Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne) is California's statutory authority for the protection of water quality and applies to surface waters, wetlands, and groundwater, and to both point and nonpoint sources. Under the Porter-Cologne, the State Water Resources Control Board (State Board) has the ultimate authority over State water rights and water quality policy. However, Porter-Cologne also establishes nine RWQCBs to oversee water quality on a day-to-day basis at the local/regional level. The API is located within Region 3 – Central Coast RWQCB. Porter-Cologne incorporates many provisions of the federal CWA, such as delegation to the State Board and RWQCBs of the National Pollutant Discharge Elimination System (NPDES) permitting program.

Under Porter-Cologne, the state must adopt water quality policies, plans, and objectives that protect the state's waters for the use and enjoyment of the people. Regional authority for planning, permitting, and enforcement is delegate to the nine RWQCBs. The regional boards are required to formulate and adopt water quality control plans for all areas in the region and establish water quality objectives in the plans. The Porter-Cologne sets forth the obligations of the State Board and RWQCBs to adopt and periodically update water quality control plans (basin plans). The act also requires waste dischargers to notify the RWQCBs of such activities through filing of Reports of Waste Discharge (RWD) and authorizes the State Board and RWQCBs to issue and enforce waste discharge requirements (WDRs), NPDES permits, Section 401 water quality certifications, or other approvals. The RWQCBs also have authority to issue waivers to RWD requirements and WDRs for broad categories of "low threat" discharge activities that have minimal potential for adverse water quality effects, when implemented according to prescribed terms and conditions.

The term "Waters of the State" is defined by Porter-Cologne as "any surface water or groundwater, including saline waters, within the boundaries of the state." The RWQCB protects all waters in its regulatory scope but has special responsibility for wetlands, riparian areas, and headwaters, including isolated wetlands, and waters that may not be regulated by the ACOE under Section 404 of the CWA. Waters of the State are regulated by the RWQCB under the State Water Quality Certification Program, which regulates discharges of fill and dredged material under Section 401 of the CWA and the Porter-Cologne.

***California Coastal Act*:** The California Coastal Commission (CCC) was established by voter initiative in 1972 (Proposition 20) and later made permanent by the California State Legislature through adoption of the CCA of 1976. The CCC, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. California's coastal zone generally extends 1,000 yards inland from the mean high tide line. In significant coastal estuarine habitat and recreational areas, it extends inland to the first major ridgeline or five miles from the mean high tide line, whichever is less. In developed urban areas, the boundary is generally less than 1,000 yards. Development activities, which are broadly

defined by the CCA to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a Coastal Development Permit (CDP) from either the CCC or the local government if a Local Coastal Program (LCP) has been certified. After certification of a LCP, coastal development permit authority is delegated to the appropriate local government, but the CCC retains original permit jurisdiction over certain specified lands (such as tidelands and public trust lands). The Commission also has appellate authority over development approved by local governments in specified geographic areas as well as certain other developments. A CDP is required in addition to any other permit required from resource agencies, unless the project is exempt.

The CCC or the local government may designate areas of rare or unique biological value, such as wetland and riparian habitat and habitats for special-status species, as ESHA. Section 30107.5 of the CCA defines an "environmentally sensitive area" as any area in which plant or animal life or their habitat are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments. Development is restricted within the coastal zone and prohibited within designated ESHA, unless the development is coastal dependent and does not have a significant effect on the resources. Section 30240 of the CCA states that "environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas." This section also states that "development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas and shall be compatible with the continuance of those habitat and recreation areas."

The Proposed Project is located primarily in unincorporated Monterey County between the City and Del Monte Forest. A small portion of the Pescadero Road site is located within the City. The entirety of the Project site is located within the coastal zone. The Project site falls within the boundaries of three certified LCPs: the City's LUP, Carmel Area LUP, and the Del Monte Forest Area LUP.

However, according to Title 20, Zoning Ordinance for the County of Monterey, Chapter 20.70.120(G), Exemptions from Coastal Development Permits, the Proposed Project would be considered exempt from County coastal permit requirements. As stated in the ordinance: The installation, testing, and placement in service or the replacement of any necessary utility connection between an existing service facility and any development provided that the County may, where necessary, require reasonable conditions to mitigate any adverse impacts on coastal resources, including scenic resources (see the CCC's September 5, 1978 "Repair, Maintenance and Utility Hook-Up Exclusions from Permit Requirements" document for further detail on which public utility projects are exempt). Under this guidance from the CCC, for excluded activities related to transmission, distribution, and communication facilities, a coastal permit is not required to install, test, place in service, maintain, replace, modify, or relocate underground facilities provided that the work is limited to public road or railroad rights-of-way or public utility easements and provided that there is no removal of major vegetation and the site is restored as close as reasonably possible to its original condition.

A portion of the Proposed Project site is located within the City's General Plan, which serves as the certified LCP for that area. This area does not contain any ESHA as defined by the General Plan. Under Title 17 Chapter 52, Permit Procedures, the Proposed Project would be considered exempt from the City's coastal permit requirements. The installation, testing, and placement in service or the replacement of any necessary utility connection between an existing service facility and any development which has been granted a valid coastal development permit; provided; however, that the

City may, where necessary, require reasonable conditions to mitigate any adverse impacts on coastal resources, including scenic resources.

Local

***1982 Monterey County General Plan*:** The following goals, objectives, and policies of the 1982 Monterey County General Plan could apply to the Proposed Project:

Goal 7: To preserve the diversity and conserve the extent of the County's native vegetation.

Policy 7.1.1: Development shall be carefully planned in, or adjacent to, areas containing limited or threatened plant communities, and shall provide for the conservation and maintenance of the plant communities.

Policy 7.1.2: The County shall encourage the protection of limited or threatened plant communities through dedications of permanent conservation easements and other appropriate means.

Policy 7.2.1: Landowners and developers shall be encouraged to preserve the integrity of existing terrain and natural vegetation in visually sensitive areas such as hillsides and ridges.

Goal 9: To conserve the abundance and diversity of the County's wildlife.

Policy 9.2.1: Land use practices which could result in siltation and pollution of inland and marine waters shall be carefully managed in order to assure a clean and productive habitat.

Objective 10.1: Promote protection of the native plant and animal communities of the Pacific Ocean along the coast of Monterey County.

Goal 11: To conserve natural habitats for native plant and animal species and to promote preservation of rare and endangered plant and animal species.

Objective 11.2: Maintain and regularly update information regarding areas of particular environmental sensitivity or concern, and coordinate these efforts with the appropriate resource agencies.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the preservation of biological resources. The following policies from the Carmel Area LUP may apply to the Proposed Project:

GP 2.2-7: Structures shall be located and designed to minimize tree removal and grading for the building site and access road. Where earth movement would result in extensive slope disturbance or scarring visible from public viewing points and corridors, such activity will not be allowed. Extensive landform alteration shall not be permitted.

2.3.3.1: Development, including vegetation removal, excavation, grading, filling, and the construction of roads and structures, shall be avoided in critical and sensitive habitat areas, riparian corridors, wetlands, sites of known rare and endangered species of plants and animals, rookeries and major roosting and haul-out sites, and other wildlife breeding or nursery areas identified as critical. Resource-dependent uses, including nature education and research, hunting, fishing, and aquaculture, shall be allowed within environmentally sensitive habitats and only if such uses will not cause significant disruption of habitat values. Only small-scale development necessary to support the

resource-dependent uses may be located in sensitive habitat areas if they can not feasibly be located elsewhere.

Wetlands are defined as lands which may be covered periodically or permanently with shallow water and include saltwater marshes, fresh water marshes, open or closed brackish water marshes, swamps, mudflats and fens.

2.3.3.2: Land uses adjacent to locations of environmentally sensitive habitats shall be compatible with the long-term maintenance of the resource. New land uses shall be considered compatible only where they incorporate all site planning and design features needed to prevent habitat impacts and where they do not establish a precedent for continued land development which, on a cumulative basis, could degrade the resource.

2.3.3.5: Where private or public development is proposed in documented or expected locations of environmentally sensitive habitats - particularly those habitats identified in General Policy No. I - field surveys by qualified individuals or agency shall be required to determine precise locations of the habitat and to recommend mitigating measures to ensure its protection. This policy applies to the entire segment except the internal portions of Carmel Woods, Hatton Fields, Carmel Point (Night heron site excluded), Odello, Carmel Meadows, and Carmel Riviera. If any habitats are found on the site or within 100 feet from the site, the required survey shall document how the proposed development complies with all the applicable habitat policies.

2.3.3.6: The County shall require deed restrictions or dedications of permanent conservation easements in environmentally sensitive habitat areas where development is proposed on parcels containing such habitats. Where development has already occurred in areas supporting sensitive habitat, property owners should be encouraged to voluntarily establish conservation easements or deed restrictions.

2.3.3.7: Where development is permitted in or adjacent to environmentally sensitive habitat areas, the County, through the development review process, shall restrict the removal of indigenous vegetation and land disturbance (grading, excavation, paving, etc.) to that needed for the structural improvements themselves.

2.3.3.8: The County shall require the use of appropriate native species in proposed landscaping.

2.3.4.1: Riparian plant communities shall be protected by establishing setbacks consisting of a 150-foot open space buffer zone on each side of the bank of perennial streams and 50 feet on each side of the bank of intermittent streams, or the extent of riparian vegetation, whichever is greater. No new development, including structural flood control projects, shall be allowed within the riparian corridor. However, improvements to existing dikes and levees shall be allowed if riparian vegetation damage can be minimized and at least an equivalent amount and quality of replacement vegetation is planted. In addition, exceptions may be made for carefully sited recreational trails. The setback requirement may be modified if it can be demonstrated that a narrower corridor is sufficient to protect existing riparian vegetation. Riparian vegetation is an association of plant species which typically grows adjacent to freshwater courses and needs or tolerates a higher level of soil moisture than dryer upland vegetation.

2.3.4.2: The County shall assist the maintenance and protection of the Carmel River lagoon and marsh by encouraging the retention of sufficient instream flows and controlling erosion and sedimentation from surrounding and upstream areas.

4.4.3.A.1: Only the minimum level of facilities essential to the support of recreational, educational, or scientific use of Resource Conservation areas shall be permitted. Facilities shall be sited so as to avoid adverse impacts to environmentally sensitive habitats and wildlife.

4.4.3.B.2: Development that would threaten rare and endangered plant and animal species in the Resource Conservation areas shall not be allowed.

City's General Plan: The City's General Plan includes goals and policies related to the preservation of biological resources. The following goals from the City's General Plan may apply to the Proposed Project:

G5-3: Protect, conserve and enhance the unique natural beauty and irreplaceable natural resources of Carmel and its Sphere of Influence, including its biological resources, water resources, and scenic routes and corridors. (LUP)

G5-4: Preserve and enhance the City's legacy of an urbanized forest of predominantly Monterey pine, coast live oak and Monterey Cypress. (LUP)

G5-12: Identify, protect and manage Environmentally Sensitive Habitat Areas (ESHAs) to ensure their long-term integrity and the biological productivity of these habitats. (LUP)

P5-103: Identify and protect environmentally sensitive habitat areas against any significant disruption of habitat values. Only uses dependent upon those resources shall be allowed. For private lots of record within ESHA, establish a transfer of development rights program using credits of water, floor area, density or some other development parameter to relocate development to less sensitive areas. (LUP)

P5-104: Preserve and protect wetlands. (LUP)

P5-161: Avoid disturbance or degradation of resources when maintenance vehicles and equipment enter sensitive habitat areas. (LUP)

P5-182: Continue to ensure that development, whether commercial or residential, does not diminish the village character by excessively blocking important public views, private views or disturbing natural topography, significant trees, or native growth. (LUP)

P5-183: Promote the placement of utilities underground where feasible and with minimum detriment to the root system of trees. (LUP)

P5-209: New development shall be sited and designed on the most suitable portion of the site while ensuring protection and preservation of natural and sensitive site resources by providing for the following:

- Protecting areas that provide important water quality benefits, areas necessary to maintain riparian and aquatic biota and/or that are susceptible to erosion and sediment loss;
- Analyzing the natural resources and hazardous constraints of planning areas and individual development site to determine locations most suitable for development;

- Promoting clustering of development on the most suitable portions of a site taking into account geologic constraints, sensitive resources, and natural drainage features;
- Preserving and protecting riparian corridors, wetlands, and buffer zones;
- Minimizing disturbance of natural areas, including significant trees, native vegetation, and root structures;
- Using natural drainage as a design element, maximizing the preservation of natural contours and native vegetation;
- Limiting land disturbance activities such as clearing and grading, limiting cut and fill to reduce erosion and sediment loss, and avoiding steep slopes, unstable areas, and erosive soils. (LUP)

***Del Monte Forest Area LUP*:** The Del Monte Forest Area LUP includes goals and policies related to the preservation of biological resources. The following policies from the Del Monte Forest Area LUP may apply to the Proposed Project:

8: Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values. Within environmentally sensitive habitat areas, new land uses shall be limited to those that are dependent on the resources therein. Land uses and development adjacent to environmentally sensitive habitat areas shall be compatible with long-term maintenance of the habitat area, and such land use and development shall be sited and designed to prevent impacts that would significantly degrade the habitat areas.

11: Contiguous areas of land in open space uses shall be maintained wherever possible to protect environmentally sensitive habitat areas and associated wildlife values. To this end, development of parcels immediately adjacent to environmentally sensitive habitat areas shall be planned to keep development intensity immediately adjacent to the sensitive habitats as low as possible, consistent with other planning criteria (e.g., drainage design, roadway design, and public safety).

14: Near environmentally sensitive habitat areas, native vegetation removal and land disturbance (grading, excavation, paving, etc.) shall be restricted to the minimum amount necessary to accommodate reasonable development. Development shall be sited and designed to prevent impacts that would significantly degrade those nearby areas, and shall be compatible with the continuance of those habitat areas.

16: Prior to approval of development on existing legal lots of record, a biological report shall be prepared by a qualified biologist for the purpose of determining the presence of rare, endangered, and/or sensitive native plant and animal species and habitats and developing appropriate siting and design standards.

Monterey County Code (MCC): Title 20 of the MCC regulates land uses within the Coastal Zone of unincorporated Monterey County. The Proposed Project occurs on parcels zoned as MDR-CZ and RC-CZ. Chapter 20.12 of Title 20 regulates land uses in the MDR-CZ zoning district. Section 20.12.030 of Title 20 states that a Coastal Development Permit is required for any project within MDR-CZ involving development within one hundred (100) feet of mapped or field identified environmentally sensitive habitats. Section 20.36.030 likewise requires a Coastal Development Permit for any project within RC-CZ

involving development within one hundred (100) feet of mapped or field identified environmentally sensitive habitats. However, as discussed above, according to Title 20, Zoning Ordinance for the County of Monterey, Chapter 20.70.120(G), Exemptions from Coastal Development Permits, the Proposed Project would be considered exempt from County coastal permit requirements as it is a relocation of existing utilities within existing roadways and easements.

***City Municipal Code**:* Chapter 17.48.050 of the City's Municipal Code requires a permit for trees on private property for any alteration that would remove roots greater than two inches in diameter, and any tree on public property where pruning or root removal is proposed. Permit application requirements include the number, size, and species of tree roots to be removed. Section 17.48.110 also requires protection of trees during construction, including protection of tree roots from drying out during excavation, and any trimming cuts are required to conform to arboricultural standards.

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	■	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	■	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	■
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

Impact Discussion

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

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Project area is considered to be sensitive for candidate, sensitive, and special-status species, including but not limited to, Monterey Pine, MDFW, and various raptors and other protected avian species. Vegetation removal and ground-disturbing activities, including trench excavation and backfilling, would be required in some areas for the installation of the new sewer mains and manholes. These activities are primarily limited to developed roadways and residential properties within both Proposed Project sites. However, ground-disturbing activities may be required within the degraded Monterey pine forest habitat, which provides suitable habitat for MDFW. If present, construction activities may result in direct mortality and/or loss of habitat for these species, which would represent a potentially significant impact. However, impacts to this species would be reduced to a less-than-significant level with incorporation of **Mitigation Measure BIO-1** identified below.

Construction noise has the potential to result in potentially significant impacts to nesting birds in adjacent trees and vegetation as a result of nest abandonment and failure, which can result in injury, harm, or mortality. However, noise reduction measures will be implemented during construction activities in accordance with **Mitigation Measure NOI-1** identified in **Section 4.10, Noise**. Therefore, with implementation of **Mitigation Measure NOI-1**, construction noise would be reduced to below 85 dBA Leq, which is below levels anticipated to result in injury, harm, or mortality to nesting birds. However, the Proposed Project would require the removal of two Monterey pine trees (see **Appendix A**, sheets C-2 and C-3) and trimming of other trees, which provide suitable habitat for nesting birds and, therefore, the removal and trimming of trees may result in potentially significant impacts to nesting birds, if present. Implementation of **Mitigation Measure BIO-1** and **Mitigation Measure BIO-2** would reduce potentially significant impacts to any species identified as a candidate, sensitive, or special-status species to a less-than-significant level.

> **Mitigation Measure BIO-1**: The following best management practices shall be implemented during all identified phases of construction (i.e., pre-, during, and post-) to reduce impacts to sensitive biological resources:
>
> - CAWD shall retain a qualified biologist to conduct an Employee Education Program for the construction crew prior to any construction activities (staging and mobilization) to aid workers in recognizing special-status species and sensitive habitats that may occur in the construction area. The qualified biologist shall meet with the construction crew at the onset of construction at the Project site to educate the construction crew on the following: 1) the appropriate access route(s) in and out of the construction area and review project boundaries; 2) the special-status species and sensitive habitats that may be present; 3) the specific mitigation measures that will be incorporated into the construction effort; 4) the general provisions and protections afforded by the Service and CDFW; and 6) the proper procedures if a special-status species is encountered within the project site. A fact sheet conveying this information shall be provided to all

personnel involved with construction. The qualified biologist shall perform additional trainings for any employees that are added to the construction crew after the onset of construction, prior to these employees being authorized to engage in construction activities. All employees shall sign a form provided by the qualified biologist indicating that they have attended the training and understand the information presented. The form shall be submitted to CAWD by the qualified biologist to document compliance.

- Protective fencing shall be placed prior to and during construction to keep construction equipment and personnel from impacting vegetation outside of work limits.
- Trees and vegetation not planned for removal or trimming shall be protected prior to and during construction to the maximum extent possible through the use of exclusionary fencing, such as hay bales for herbaceous and shrubby vegetation, and protective wood barriers for trees.
- Grading, excavating, and other activities that involve substantial soil disturbance shall be planned and implemented in consultation with a qualified hydrologist, engineer, or erosion control specialist, and shall utilize standard erosion control techniques to minimize erosion and sedimentation to native vegetation adjacent to the Project site (pre-, during, and post-construction).
- Following construction, disturbed areas shall be restored to pre-Project contours by the construction contractor to the maximum extent possible and revegetated using locally-occurring native species and native erosion control seed mix, per the recommendations of a qualified biologist.
- To protect against spills and fluids leaking from equipment, CAWD shall require that the construction contractor maintains an on-site spill plan and on-site spill containment measures that can be easily accessed.
- No firearms shall be allowed on the Project site at any time.
- All food-related and other trash will be disposed of in closed containers and removed from the Project area at least once a week during the construction period, or more often if trash is attracting avian or mammalian predators. Construction personnel shall not feed or otherwise attract wildlife to the area.

Mitigation Measure BIO-2: Tree removal and trimming activities that may affect nesting raptors and other protected avian species can be timed to avoid the avian nesting season (February 1 through September 15). Specifically, tree removal and trimming activities can be scheduled between September 16 and January 31. If this is not possible, pre-construction surveys for protected avian species shall be conducted by a qualified biologist within 15 days prior to the commencement of construction activities in all trees planned for removal or trimming. If nesting birds are identified during pre-construction surveys, an appropriate buffer shall be imposed within which no construction activities or disturbance will take place (generally 300 feet in all directions). A qualified biologist shall be on-site during work re-initiation in the vicinity of the nest offset to ensure that the buffer is adequate and that the nest is not stressed and/or abandoned. No work shall proceed in the vicinity of an active nest until such time as all young are fledged, as determined by the qualified biologist, or until after September 1 (when young are assumed fledged).

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

The Proposed Project is primarily limited to existing paved roadways. However, sensitive habitats, including degraded Monterey pine forest and potential wetland areas, are known to occur within and adjacent to the Proposed Project sites. Degraded Monterey pine forest is located within both Proposed Project sites. The Proposed Project would require the removal of two Monterey pine trees (see **Appendix A**, Sheets C-2 and C-3) and trimming of other trees, which provide suitable habitat for nesting birds and, therefore, the removal and trimming of trees may result in potentially significant impacts to nesting birds, if present. No additional tree removal is proposed as part of the Proposed Project. Removal of these trees is anticipated to require a tree removal permit from the County. Adherence to the conditions of the tree removal permit, as well as implementation of **Mitigation Measures BIO-1**, **BIO-3**, and **BIO-4**, would reduce potentially significant impacts to Monterey pine forest habitat to a less-than-significant level. Potential wetland areas are located within the Pescadero Road Project site. However, no vehicles or heavy equipment would enter these areas. Construction equipment in these areas would be restricted to hoses and hand tools, which would be carried into the canyon by foot. Another potential wetland is located directly adjacent to Pescadero Road near Stevenson School where drainage ditch maintenance is planned. Project plans include a 10-foot-wide buffer between the grading limits for the ditch maintenance and the potential wetland to avoid impacts to this potentially sensitive habitat. Therefore, maintenance of the drainage ditch along Pescadero Road would not result in any direct impacts to sensitive habitat.

While no Project activities would directly impact these sensitive resources, indirect impacts could occur if construction equipment, staging activities, or personnel inadvertently encroach into adjacent sensitive habitat areas. Implementation of **Mitigation Measures BIO-1**, **BIO-3**, and **BIO-4** would reduce potentially significant impacts to sensitive habitats to a less-than-significant level.

> **Mitigation Measure BIO-3:** Disturbance of Monterey pine forest and other sensitive habitats (such as wetlands and riparian corridors), including the removal of native trees within these habitats, shall be avoided to the maximum extent possible. Prior to commencement of construction, high visibility fencing and/or flagging shall be installed, with the assistance of a qualified biologist, to indicate the limits of work and the boundaries of sensitive habitat areas to be avoided.
>
> a) The limits of work shall be designated to avoid impacts to the surrounding Monterey pine forest and other sensitive habitats to the maximum extent possible and to maximize native tree and shrub retention.
> b) No work-related activity including equipment staging, vehicular access, grading and/or vegetation removal shall be allowed outside the designated limits of work.
>
> **Mitigation Measure BIO-4:** Tree pruning shall be minimal but, when necessary, shall be performed in accordance with American National Safety Institute (ANSI) A300 Pruning Standards. Pruning may include the larger canopied trees that are obstructing access to the Project site. Should the health and vigor of any tree decline, it shall be treated as appropriately recommended by a certified arborist or qualified forester. In general, trees shall be assessed then pruned only for safety (e.g., broken and cracked limbs shall be removed in high-traffic

areas of concern). No more than 25 percent of the overall tree crown shall be pruned in one season.

Where alternative routes are not available, any subsurface construction related activities for the Project shall avoid cutting major roots with a diameter of greater than or equal to two inches, unless necessary. All approved construction within the root zone shall conform to the following construction practices:

a) Hand trenching at point or line of grade cuts closest to the trunk to expose major roots two inches or more in diameter.
b) In cases where rock or unusually dense soil prevents hand trenching, mechanical trenching may be permitted provided that work inside the dripline is closely supervised to prevent tearing or other damage to major roots (greater than or equal to two inches).
c) Exposed major roots shall be cut with a saw to form a smooth surface and avoid tearing or jagged edges.
d) Absorbent tarp or heavy cloth fabric shall be placed over grade cuts where roots are exposed and secured with stakes and two to four inches of compost or wood chips spread over the tarp to prevent moisture loss. Care shall be taken that moisture levels beneath tarped areas remain comparable to surrounding areas until backfilling occurs. Some watering of these areas may be necessary to maintain moisture levels, and such measures shall remain in effect through all phases of construction, including all delays and other periods of inactivity.

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

The Proposed Project is located in unincorporated Monterey County between the City and Del Monte Forest. The Proposed Project is located adjacent to two potential wetland areas, as discussed above, which could be under the jurisdiction of the ACOE. While no Project activities would directly impact these wetlands, indirect impacts could occur if construction equipment, staging activities, or personnel inadvertently encroach into adjacent sensitive habitat areas. Implementation of **Mitigation Measure BIO-1** and **Mitigation Measure BIO-3** would reduce potentially significant impacts to wetlands to a less-than-significant level.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The Proposed Project is located in unincorporated Monterey County between the City and Del Monte Forest. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project sites are not located within any wildlife corridors and do not provide opportunities for local movement due to the Project's location in a developed, urban area. Therefore, the Proposed Project would result in no impact regarding potential interference with wildlife movement.

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

Development, including tree removal, within the site is regulated by the City's General Plan and LUP, the County's Carmel Area LUP, Del Monte Forest Area LUP, the County's General Plan, and City and County Municipal Codes. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. Proposed Project construction would occur primarily within paved and previously developed areas. The Proposed Project has been designed to avoid impacts to the extent feasible; however, constraints associated with surrounding residential development and the location of the existing failing sewer infrastructure make complete avoidance of tree removal or trimming unlikely. The removal of two Monterey pine trees would be required to facilitate access to the new sewer main within the degraded Monterey pine forest habitat. Removal of these trees is anticipated to require a tree removal permit from the County. Adherence to the conditions of the tree removal permit would be required, and, therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources. The Proposed Project would have a less-than-significant impact with regard to conflicting with local policies or ordinances protecting biological resources.

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

The Proposed Project is not located within an area included in an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

4.4 Cultural Resources

Albion Environmental, Inc. (Albion) prepared a Phase I Cultural Resource Inventory and AB 52 Consultation for the Project sites in March 2026.[3] The Phase I Cultural Resource Inventory includes the results of background research and field reconnaissance of the Proposed Project area. Background research consisted of a records search from the California Historical Resources Information System (CHRIS), the Northwest Information Center at Sonoma State University (NWIC), and a Sacred Land Files (SLF) search, followed by a pedestrian archaeological field survey of the Project area. CAWD separately conducted Native American outreach to facilitate Tribal consultation under Assembly Bill (AB) 52 (see **Section 4.13, Tribal Cultural Resources** for additional details on tribal consultation). The field reconnaissance consisted of a pedestrian survey of the Project area between January 19 and 21, 2026, which investigated the Project area for cultural and Tribal Cultural Resources (TCRs).

Environmental Setting

The Proposed Project is located in unincorporated Monterey County between the City and Del Monte Forest. A search of records at the NWIC indicated that 28 previous cultural resource studies have been conducted within the Project area and that 157 previous cultural resource studies have been conducted within a 0.25-mile radius of the Project area. According to the record search, there is one (1) previously identified cultural resource within the Project area, and 17 cultural resources within a 0.25-mile radius

[3] Due to the potentially confidential nature of items in this report, this study is not included in the IS/MND. Qualified personnel may request a copy of this report from CAWD.

of the Project area. The archival research illustrates that historic-era land use within the Project Area dates to the 1940s and 1950s. Albion's SLF search indicated that Sacred Land Files were known to be located within the Project area. However, Albion's pedestrian survey of the Proposed Project area yielded negative results and did not identify any cultural resources, precolonial or historic resources, or anthropogenic soils. It is important to note that Albion stated that given the presence of known precolonial archaeological sites within 0.25 miles, and the poor visibility of the ground surface during our pedestrian survey, it is possible that precolonial archaeological resources may be present within the Proposed Project area (Albion, 2026).

Regulatory Environment

State

California Environmental Quality Act: CEQA requires regulatory compliance for projects involving historic resources throughout the State. Under CEQA, public agencies must consider the effects of their actions on historic resources (Public Resources Code, Section 21084.1). The CEQA Guidelines define a significant resource as any resource listed in or determined to be eligible for listing in the California Register of Historical Resources (California Register) [see Public Resources Code, Section 21084.1 and CEQA Guidelines Section 15064.5 (a) and (b)].

California Public Resources Code: Several sections of the California PRC protect cultural resources located on public land. Under PRC Section 5097.5, no person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site (including fossilized footprints), inscriptions made by human agency, rock art, or any other archaeological, paleontological, or historical feature situated on public lands, except with the express permission of the public agency that has jurisdiction over the lands. Violation of this section is a misdemeanor.

PRC Section 5097.98 states that if Native American human remains are identified within a project area, the landowner must work with the Native American Most Likely Descendant as identified by the Native American Heritage Commission (NAHC) to develop a plan for the treatment or disposition of the human remains and any items associated with Native American burials with appropriate dignity. These procedures are also addressed in Section 15064.5 of the State CEQA Guidelines. California Health and Safety Code Section 7050.5 prohibits disinterring, disturbing, or removing human remains from a location other than a dedicated cemetery. Section 30244 of the PRC requires reasonable mitigation for impacts on paleontological and archaeological resources that occur because of development on public lands.

California Health and Safety Code: California Health and Safety Code Section 7050.5 regulates the treatment of human remains. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to his or her authority. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours.

Local

***1982 Monterey County General Plan*:** The following goals and policies of the 1982 Monterey County General Plan could be applicable to the Proposed Project.

Goal 12: To encourage the conservation and identification of the County's archaeological resources.

Policy 12.1.3: All proposed development, including land divisions, within high sensitivity zones shall require an archaeological field inspection prior to project approval.

Policy 12.1.6: Where development could adversely affect archaeological resources, reasonable mitigation procedures shall be required prior to project approval.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the preservation of cultural resources. The following goals from the Carmel Area LUP may apply to the Proposed Project:

2.8.3.5: Archaeological surveys shall be required for all new subdivisions and for all other development within close proximity of known sites. Such surveys shall be performed by qualified individuals.

2.8.4.5: No development proposals in archaeologically sensitive areas shall be categorically exempt from environmental review.

2.8.4.6: When other site planning constraints do not permit avoidance of construction on archaeological or other types of cultural sites, adequate preservation measures shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.

City's General Plan: The City's General Plan includes goals and policies related to the preservation of cultural resources. The following goals from the City's General Plan may apply to the Proposed Project:

O1-18: Identify and protect archaeological resources within Carmel. (LUP)

P1-110: All available measures, including redesign and obtaining archaeological easements, shall be pursued to avoid development on sensitive archaeological sites. Site preservation shall be preferred over excavation of the resource. (LUP)

P1-111: If archaeological resources are discovered during construction, work shall cease immediately and the resource shall be preserved or the impact mitigated according to these policies. This policy shall apply Citywide. (LUP)

P1-112: Require monitoring and either safe retrieval, collection and archiving or preservation in-situ of all identified archaeological resources. Conduct all testing, monitoring and mitigation of impacts in accordance with the recommendations of a Registered Professional Archaeologist and consistent with the requirements in the State CEQA Guidelines section 15064.5. (LUP)

P1-113: Transmit all archaeological resource reports and attachments to the Northwest Information Center as designated by the State Office of Historic Preservation. (LUP)

***Del Monte Forest Area LUP*:** The Del Monte Forest Area LUP includes goals and policies related to the preservation of cultural resources. The following goals from the Del Monte Forest Area LUP may apply to the Proposed Project:

57: The timely identification and evaluation of archaeological, historical, and paleontological resources, and coordination with applicable Native American representatives, is encouraged, so that these resources are given full consideration during the conceptual design phase of land use planning for project development.

58: Whenever development is proposed, it shall be determined whether the affected property has received an archaeological survey. If not, such a survey shall be conducted to determine if archaeological resources exist. The survey should describe the sensitivity of the site and make appropriate recommendations concerning needed protection of the resource. If the development activity is subject to environmental review, this policy may be satisfied in conjunction with environmental review.

59: Where significant archaeological resources are identified, all available measures including dedication of open space conservation or scenic easements and purchase of development rights shall be considered to avoid development on significant archaeological sites.

60: When developments are permitted on parcels where archaeological or other cultural resource sites are located, project design shall be required which avoids or mitigates impacts to such sites. Where the site has religious significance, emphasis should be placed on preserving the entire site; likewise, where the site is of known regional significance, consideration shall be given to nominating the site to the National Register and preserving it.

61: When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate preservation and mitigation measures shall be required. Preservation and mitigation measures shall be designed by a qualified archaeologist in accordance with current accepted guidelines.

Monterey County Code: Title 20 of the MCC regulates land uses within the Coastal Zone of unincorporated Monterey County. The Proposed Project occurs on parcels zoned as MDR-CZ and Resource Conservation RC-CZ. Chapter 20.12 of Title 20 regulates land uses in the MDR-CZ zoning district. Section 20.12.030 of Title 20 states that a Coastal Development Permit is required for any project within MDR-CZ involving development within a parcel with positive findings from an archaeological report. Section 20.36.030 likewise requires a Coastal Development Permit for any project within RC-CZ involving development within a parcel with positive findings from an archaeological report. However, according to Title 20, Zoning Ordinance for the County of Monterey, Chapter 20.70.120(G), Exemptions from Coastal Development Permits, the Proposed Project would be considered exempt from County coastal permit requirements as it is a relocation of existing utilities within existing roadways and easements.

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	■
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	■	☐	☐

Impact Discussion

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

CEQA Guidelines Section 15064.5 defines a historical resource as one being listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register. PRC Section 21084.1 states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Albion identified one built environmental resource within the Project area, the Stevenson Lower and Middle School, which is a potentially historic school building complex built in 1952 (Albion, 2026). Although the boundaries of this historic-era resource slightly overlap the Project area, the Proposed Project would not directly or indirectly impact this resource. All construction work involving ground disturbance would be limited to the outlined roadways and would not result in any above ground features that could affect the potential historical significance of the site. Therefore, the Proposed Project would result in no impact related to a substantial adverse change in the significance of a historical resource.

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

Section 21083.2 of the PRC requires lead agencies to assess potential impacts to archaeological resources and determine whether a project may cause a substantial adverse change in the significance of an archaeological resource. Albion conducted a records search at the NWIC and completed a pedestrian survey of the Proposed Project area. The results of the pedestrian survey were negative for sensitive resources, although ground visibility was considered poor. According to the record search, there is one (1) previously identified cultural resource within the Project Area, the Stevenson Lower and Middle School, and 17 cultural resources within a 0.25-mile radius of the Project area. In addition, the SLF request to the NAHC was returned with positive results (Albion, 2026). As a result, given the presence of known precolonial archaeological sites within 0.25 miles and the poor visibility of the ground surface during the pedestrian survey, it is possible that precolonial archaeological resources may be present within the Project area. Implementation of **Mitigation Measure CUL-1**, **CUL-2**, and **CUL-3** would reduce potentially significant impacts to archaeological resources to a less-than-significant level.

> **Mitigation Measure CUL-1**: Prior to the start of ground disturbing activities, CAWD shall retain a qualified Archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for archaeology in either prehistoric or historic archaeology, to prepare a Cultural Resources Monitoring and Discovery Plan (CRMDP) in consultation with the Esselen Tribe of

Monterey County, the Ohlone Costanoan Esselen Nation, and the Costanoan Rumsen Carmel Tribe (see **Mitigation Measure TCR-2**). The CRMDP shall include requirements for pre-construction cultural resources sensitivity training, monitoring protocols, monitoring schedules, communication protocol and procedures in the event of a potential discovery, consultation requirements, and documentation requirements. The qualified Archaeologist shall also oversee an archaeological monitor who shall be present during initial ground disturbing activities associated with the Proposed Project. The archaeological monitoring program shall follow protocols outlined in the CRMDP, which shall contain an allowance that the qualified Archaeologist may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering intact archaeological deposits in the area is low, based on observations during initial ground disturbance, and in coordination with the Native American monitor(s) and CAWD. The reduction or elimination of Native American monitoring may be undertaken based on the stipulations outlined in **Mitigation Measure TCR-2**. The qualified Archaeologist shall prepare daily monitoring logs, along with a monitoring report at the conclusion of archaeological monitoring. The CRMDP shall be submitted to CAWD for review and approval, as well as to the Esselen Tribe of Monterey County, the Ohlone Costanoan Esselen Nation, and the Costanoan Rumsen Carmel Tribe, for review and comment before finalized. The requirements outlined in the final CRMDP shall be implemented during project construction.

Mitigation Measure CUL-2: Prior to the start of ground disturbing activities, CAWD shall retain a qualified Archaeologist, as well as tribal representatives (see **Mitigation Measure TCR-1**), to perform a Cultural Resources Sensitivity Training for construction personnel. Cultural resources sensitivity training shall be pre-recorded for presentation to all construction personnel. The training shall focus on how to identify archaeological resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event. This pre-recorded training shall be provided for any new personnel joining the construction team. The Professional Archaeologist shall keep a record (i.e., sign-in sheet) of all personnel who attended the training and provide copies of the attendance records and presentation materials to CAWD for their records.

Mitigation Measure CUL-3: In the event that Precontact (e.g., hearths, stone tools, shell and faunal bone remains, etc.) or historic-era (e.g., bottles, foundations, refuse dumps/privies, etc.) archaeological resources are unearthed, ground-disturbing activities within a 100-ft radius of the discovery should be halted or diverted away from the find. An appropriate buffer area should be established by the qualified Archaeologist, in consultation with the Native American tribal representatives, around the find where construction activities should not be allowed to continue. Work should be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities should be evaluated by a qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the qualified Archaeologist, in consultation with Native American tribal representatives, should develop and implement a Cultural Resources Treatment Plan (CRTP) which would outline methods to be used to mitigate project impacts. The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the Esselen Tribe of Monterey County, the Ohlone Costanoan Esselen Nation, and the Costanoan Rumsen Carmel Tribe.

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

No known human remains, including those interred outside of dedicated or formal cemeteries, are known to occur on the Proposed Project sites. Additionally, Native American Tribes were consulted during the preparation of the Phase I Cultural Resource Inventory (see **Section 4.13, Tribal Cultural Resources**). As described above, the results of an SLF for the Proposed Project sites were positive. As a result, the Project sites could potentially contain previously unknown Native American or other human remains. To minimize potentially significant impacts to a less-than-significant level, mitigation is necessary. Implementation of **Mitigation Measure CUL-4** would reduce potentially significant impacts to human remains to a less-than-significant level.

> **Mitigation Measure CUL-4*:*** Throughout the duration of ground disturbing activities, the treatment of human remains, and any associated or unassociated funerary objects discovered during any soil-disturbing activity within the Project site shall comply with applicable State laws. This shall include immediate notification of the Monterey County Sheriff's Office and CAWD.
>
> If human remains are encountered unexpectedly during implementation of the Proposed Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) through to be the Most Likely Descendent (MLD).
>
> The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.
>
> Whenever the NAHC is unable to identify the MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representatives rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with the Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

4.5 Energy

Environmental Setting

Pacific Gas and Electric Company (PG&E) provides electricity and natural gas throughout Monterey County, including the Proposed Project site. Beginning in 2018, all PG&E customers in Monterey, San Benito, and Santa Cruz Counties were automatically enrolled in Central Coast Community Energy (3CE). 3CE is a community choice energy agency that has committed to providing its customers with 100 percent carbon-free energy by the year 2030 (3CE, 2026). Community choice energy agencies allow local governments to procure power on behalf of their residents, businesses, and municipal accounts from an alternative supplier while still receiving transmission and distribution service from their existing utility provider (in this case, PG&E). This is typically an attractive option for communities that want more local control over their electricity sources, more clean energy than their default utility offers, and/or lower electricity prices. Per Public Utilities Code Section 366.2, customers have the right to opt out of the community choice energy program and continue to receive service from the incumbent utility (i.e., PG&E).

Regulatory Environment

Local

1982 Monterey County General Plan: There are no policies or goals from the 1982 Monterey County General Plan related to energy use that would be applicable to the Proposed Project.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the regulation of energy consumption. None of the energy-related goals from the Carmel Area LUP may apply to the Proposed Project.

City's General Plan: The City's General Plan includes goals and policies related to the regulation of energy consumption. The following goal from the City's General Plan may apply to the Proposed Project:

O7-5: Minimize contributions to Greenhouse Gases.

Del Monte Forest Area LUP: There are no policies or goals from the Del Monte Forest Area LUP related to energy use that would be applicable to the Proposed Project.

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

Impact Discussion

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The Proposed Project would require energy for the installation of new pipelines, as well as any segments of existing utility lines to be removed (rather than abandoned in place), and the transport of material for construction and waste generated by construction activities. In addition, energy would be consumed due to vehicle trips to and from the Project site during construction. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for vehicle trips and other activities. The Proposed Project would not result in inefficient, wasteful, or unnecessary consumption of energy because: 1) the Project schedule is designed to be efficient to avoid excess monetary costs, and 2) energy demand associated with construction activities would be temporary in nature. As a result, the Proposed Project would have a less-than-significant impact related to wasteful, inefficient, or unnecessary consumption of energy resources.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

See *Response a.* above. Implementation of the Proposed Project would be subject to existing state energy standards and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The Proposed Project would have a less-than-significant impact related to energy usage and efficiency.

4.6 Geology and Soils

Environmental Setting

Pacific Crest Engineering Inc. prepared a Geotechnical Investigation (**Appendix E**) for the Pescadero Road Project site in March 2022. The findings of the Geotechnical Investigation are used to inform the discussion of the geological characteristics of the Pescadero Road Project site, while the Carmel Woods Project site findings are based on publicly available geological information such as the Monterey County Geologic Hazards Map, Monterey County GIS, and EQ Zapp (DOC, 2026).

The Pescadero Road Project site is not located in an Alquist-Priolo Act zone and is not mapped within a fault hazard zone. The Pescadero Road Project site is located within a seismically active area. The nearest active fault to the Pescadero Road area is the Monterey Bay-Tularcitos fault zone, located approximately 0.5 miles from the Pescadero Road area (**Appendix E**). Because of this, the potential for ground surface fault rupture to occur at the site is considered low. The Pescadero Road site has been deemed to have low landslide susceptibility, low liquefaction potential, a moderate to high erosion hazard rating (Monterey County, 2026), and is underlain by soils of low to high expansion potential.

The Carmel Woods Project site is not in an Alquist-Priolo Act zone and passes through the Monterey Bay-Tularcitos fault zone. The Carmel Woods Project site is also located within a seismically active area. The Carmel Woods Project site has been deemed to have moderate landslide susceptibility, low liquefaction susceptibility, and a moderate to high erosion hazard rating (Monterey County, 2026).

Regulatory Environment

State

***Alquist-Priolo Earthquake Fault Zoning Act*:** The Alquist-Priolo Earthquake Fault Zoning Act, passed in 1972, seeks to mitigate surface faulting's hazard to structures for human occupancy. In accordance with this act, the State Geologist established regulatory zones, called “earthquake fault zones,” around the surface traces of active faults and published maps showing these zones. In these zones, buildings for human occupancy cannot be constructed across the surface traces of active faults. Because many active faults are complex and consist of more than one branch, each earthquake fault zone extends approximately 200 to 500 feet on either side of the mapped fault trace.

Title 14 of the CCR, Section 3601(e), defines buildings intended for human occupancy as those that would be inhabited for more than 2,000 hours per year. The Proposed Project does not include any habitable structures and none of the Project sites cross an Alquist-Priolo Earthquake Fault Zone. Therefore, these provisions of the Act do not apply to the Proposed Project.

Seismic Hazards Mapping Act: The purpose of the Seismic Hazards Mapping Act of 1990 (PRC Sections 2690–2699.6) is to reduce damage resulting from earthquakes. The Seismic Hazards Mapping Act addresses earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. The State is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards. Cities and counties are required to regulate development in mapped Seismic Hazard Zones. Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Specifically, cities and counties are prohibited from issuing development permits for sites in Seismic Hazard Zones until appropriate site-specific geologic and/or geotechnical investigations have been conducted and measures to reduce potential damage have been incorporated into the development plans.

Local

***1982 Monterey County General Plan*:** The following goals, objectives, and policies from the 1982 Monterey County General Plan could be applicable to the Proposed Project.

Objective 3.1: Establish procedures for the prevention of soil erosion and the repairing of erosion damage in critical areas on both public and private lands.

Policy 3.1.1: Erosion control procedures shall be established and enforced for all private and public construction and grading projects.

Policy 3.1.3: In the absence of more detailed site specific studies, determinations of soil suitability for particular land uses shall be made according to the Soil Conservation Service's Soil Survey of Monterey County.

Goal 15: To minimize loss of life, injury, damage to property, and economic and social dislocations resulting from seismic and other geologic hazards.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the regulation of regional geology. The following policies from the Carmel Area LUP may apply to the Proposed Project:

2.4.4.C.4: The native vegetation cover, temporary vegetation, seeding, mulching, or other suitable stabilization methods shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as soon as possible with planting of native annual grasses and shrubs, appropriate non-native plants, or with approved landscaping practices.

2.4.4.C.5: Provisions shall be made to conduct, surface water to storm drains or suitable watercourses to prevent erosion. Onsite drainage devices shall be designed to accommodate increased run-off resulting from site modification. Where appropriate, on-site retention of stormwater should be required.

2.7.4.1: All development shall be sited and designed to conform to site topography and to minimize grading and other site preparation activities. Applications for grading and building permits and applications for subdivisions shall be reviewed for potential impacts to onsite and offsite development arising from geologic and seismic hazards and erosion. Mitigation measures shall be required as necessary.

City's General Plan: The City's General Plan includes goals and policies related to the regulation of regional geology. The following goals from the City's General Plan may apply to the Proposed Project:

G5-1: New development shall minimize risks to life and property, assure stability and structural integrity over the life of the development, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area. (LUP)

***Del Monte Forest Area LUP*:** There are no policies or goals from the Del Monte Forest Area LUP related to the regulation of regional geology that would be applicable to the Proposed Project.

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	■	☐
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 off-site 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?	☐	☐	☐	■
f) Directly or indirectly destroy a paleontological resource or site or unique geologic feature?	☐	☐	☐	■

Impact Discussion

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

a.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?

Pacific Crest Engineering Inc. prepared a Geotechnical Investigation (**Appendix E**) for the Pescadero Road Project component. The Pescadero Road Project site is not located in an Alquist-Priolo Act zone and is not mapped within a fault hazard zone. The nearest active fault to the Pescadero Road Project site is the Monterey Bay-Tularcitos fault zone, located approximately 0.5 miles from the Pescadero Road Project site (**Appendix E**). The Carmel Woods Project site is not in an Alquist-Priolo Act zone. The Monterey Bay-Tularcitos fault zone passes through the Carmel Woods Project site (Monterey County, 2026). However, the Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and does not propose any new habitable structures that would result in risk of loss, injury, or death due to the proximity of a known earthquake fault. Therefore, the Proposed Project would have a less-than-significant impact related to rupture of a known earthquake fault.

a.ii) Strong seismic ground shaking?

The Proposed Project is located in a seismically active region. The nearest fault zone is the Monterey Bay-Tularcitos fault zone, which passes through the Carmel Woods Project site and which is located approximately 0.5 miles from the Pescadero Road Project site. As a result, the Proposed Project sites could be subject to seismically induced hazards from ground shaking during implementation of the Project. However, the Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and does not propose any new habitable structures that would result in an increased risk of loss, injury, or death due to strong seismic ground shaking compared to existing conditions. Therefore, the Project would have a less-than-significant impact related to strong seismic ground shaking.

a.iii) Seismic-related ground failure, including liquefaction?

Surface ground rupture occurs at sites that are traversed by or lie very near an active fault. The Monterey Bay-Tularcitos fault zone passes directly under the Carmel Woods Project site and is located

0.5 miles away from the Pescadero Road Project site. According to the Geotechnical Investigation, the potential for ground surface fault rupture to occur at the Pescadero Road Project site is considered low. However, there is potential for ground surface rupture at the Carmel Woods Project site. Parcels within the Project site are designated by the County as having low liquefaction potential. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites and does not propose any new habitable structures that would result in an increased risk of loss, injury, or death due to seismic related ground failure, including liquefaction. For these reasons, the Proposed Project would have a less-than-significant impact regarding seismic-related ground failure.

a.iv) Landslides?

Landslides are common in Monterey County due to the combination of uplifting mountains, fractured and weak rocks, and periodic intense rainfall along the coast. The level of susceptibility of an area is dependent on the local geologic conditions. Both Project components are located in residential areas with moderately sloping terrain. The Pescadero Road Project site is considered to have low landslide susceptibility, while the Carmel Woods Project site is deemed to have moderate landslide susceptibility (Monterey County, 2026). The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and does not propose any new habitable structures that would result in an increased risk of loss, injury, or death due to landslides compared to existing conditions. Therefore, the Proposed Project would have a less-than-significant impact regarding landslides.

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

The County's GIS database identifies the parcels comprising the Pescadero Road Project component and the Carmel Woods Project component as having a moderate to high erosion potential (Monterey County, 2026). The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. Ground disturbing activities associated with the Project could result in accelerated soil erosion and the loss of topsoil. However, the Project is limited to the proposed utility alignment as depicted in **Figures 4** and **5.** The Proposed Project would disturb approximately 10,800 sf of soil. All disturbed areas would be backfilled and/or paved following construction to restore the site to pre-Project conditions. In addition, the Proposed Project would implement standard BMPs during construction to reduce erosion and the loss of topsoil consistent with Section 16.08.340 of the County's Municipal Code. These BMPs are anticipated to include, but not be limited to, the following:

- Prepare and maintain all disturbed surfaces via re-planting as soon as practicable following soil disturbance.
- Conduct regular watering of planted areas to assure growth.
- Control dust emissions from disturbed surfaces by regularly watering disturbed surfaces.

As a result, the Proposed Project would have a less-than-significant impact related to causing substantial soil erosion and the loss of topsoil.

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

The Pescadero Road Project component is identified as having low potential for landslides and low potential for liquefaction. The Carmel Woods Project component is identified as having moderate potential for landslides and low potential for liquefaction. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project does not include the construction of any new habitable structures that would require significant earthmoving that would increase the risk of landslide, lateral spreading, liquefaction, or collapse. As a result, the Proposed Project would have a less-than-significant impact related to being located on a geologic unit or soil that is unstable.

d. Would the project 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?

Soils within the Pescadero Road Project site are considered to have high plasticity and low to high expansion potential (**Appendix E**). Detailed soil information was not available for the Carmel Woods Project component, so the U.S. Geological Service (USGS) soil mapper was used to determine regional soil characteristics for this Project component. Soils in the area of this Project component include Narlon loamy fine sand, 2-9 percent slopes (NcC), Santa Lucia channery clay loam, 30-50 percent slopes (SfF), Santa Lucia channery clay loan, 15-30 percent slopes (SfE), and Gazos slit loam, 30-50 percent slopes (GfF) (USGS, 2026). NcC soil has low plasticity and low expansion potential and SfF and SfE soil types have slight plasticity and low to moderate expansion potential. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and does not propose any new habitable structures that would result in risks to life or property due to expansive soils. Overall, grading for both Project components would be balanced, resulting in zero net cut or fill. All imported fill used for backfill would consist of non-expansive materials. As a result, the Proposed Project would have a less-than-significant impact and would not create risks to life or property as a result of expansive soil.

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

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and does not include the use of septic tanks or alternative wastewater disposal system; therefore, no impact would occur.

f. Would the project directly or indirectly destroy a paleontological resource or site or unique geologic feature?

Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, and diagnostically or stratigraphically important, as well as those that add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally. They include fossil remains of large to very small aquatic and terrestrial vertebrates, remains of plants and animals previously not represented in certain portions of the stratigraphy and assemblages of fossils that might aid stratigraphic correlations – particularly those offering data for the interpretation of tectonic events,

geomorphologic evolution, paleoclimatology, and the relationships of aquatic and terrestrial species. Most of the fossils found in Monterey County are of marine life forms and create a record of the region's geologic history of advancing and retreating sea levels. A review of nearly 700 known fossils localities in the County was conducted in 2001; 12 fossil sites were identified as having outstanding scientific value (Rosenberg, 2001). None of these sites are located within or adjacent to either of the Proposed Project sites. The Proposed Project would not directly or indirectly destroy a paleontological resource or site or a unique geologic feature, as none exist within the Proposed Project area. Therefore, no impact would occur.

4.7 Greenhouse Gas Emissions

Environmental Setting

Global temperatures are affected by naturally occurring and anthropogenic-generated atmospheric gases, such as water vapor, carbon dioxide, methane, and nitrous oxide. Greenhouse gases (GHGs) are gases that absorb and re-emit infrared radiation in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Emissions of GHGs from human activities, such as electricity production, motor vehicle use, and agriculture, are elevating the concentration of GHGs in the atmosphere. GHG emissions from anthropogenic sources are causing a trend of unnatural warming of the earth's climate, known as global warming or global climate change.

MBARD has not yet adopted a threshold for construction-related GHG emissions but recommends utilizing thresholds set by neighboring districts (e.g., Sacramento Metropolitan Air Quality Management District [SMAQMD]). The SMAQMD GHG threshold is defined in terms of carbon dioxide equivalent (CO_2e), a metric that accounts for emissions from various GHGs based on their global warming potential. According to SMAQMD, a Project would result in a significant GHG-related impact if it would emit more than 1,100 metric tons of CO_2e per year ($MTCO_2e$/year). Operation of a stationary source project would not have a significant GHG impact if the project emits less than 10,000 $MTCO_2e$/year. Climate change has a cumulative impact; a project contributes to this impact through its incremental contribution of GHG emissions combined with the cumulative increase of all other sources of GHGs. If annual emissions of GHGs exceed these threshold levels, the Proposed Project would result in a cumulatively considerable contribution of GHG emissions and must implement mitigation measures (MBARD, 2016).

Regulatory Environment

Federal

***Federal Regulation and the Clean Air Act - Executive Order 13514*:** Executive Order 13514 is focused on reducing GHGs internally in federal agency missions, programs, and operations. Additionally, the executive order directs federal agencies to participate in the Interagency Climate Change Adaptation Task Force, which is engaged in developing a national strategy for adaptation to climate change.

On April 2, 2007, in Massachusetts v. U.S. EPA, 549 U.S. 497 (2007), the Supreme Court found that GHGs are air pollutants covered by the FCAA and that the U.S. EPA has the authority to regulate GHGs. The Court held that the U.S. EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution that may be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision.

On December 7, 2009, the U.S. EPA Administrator signed two (2) distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- Endangerment Finding: The Administrator found that the current and projected concentrations of the six (6) key well-mixed GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator found the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare.

Although these findings did not impose any requirements on industry or other entities, this action was a prerequisite to finalizing the U.S. EPA's *Proposed Greenhouse Gas Emission Standards for Light-Duty Vehicles* published on September 15, 2009. On May 7, 2010, the final *Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards* was published in the Federal Register.

U.S. EPA and the National Highway Traffic Safety Administration (NHTSA) are taking coordinated steps to enable the production of a new generation of clean vehicles with reduced GHG emissions and improved fuel efficiency from on-road vehicles and engines. These next steps include developing the first-ever GHG regulations for heavy-duty engines and vehicles and additional light-duty vehicle GHG regulations. President Obama outlined these steps in a Presidential Memorandum on May 21, 2010.

The final combined U.S. EPA and NHTSA standards making up the first phase of this national program apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. The standards require these vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide (CO_2) per mile (the equivalent to 35.5 miles per gallon if the automobile industry were to meet this CO_2 level solely through fuel economy improvements). Together, these standards will cut GHG emissions by an estimated 960 million metric tons (MMT) and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012-2016). On August 28, 2012, U.S. EPA and NHTSA issued their joint rule to extend this national program of coordinated GHG and fuel economy standards to model years 2017 through 2025 passenger vehicles.

State

***Assembly Bill 32 – California Global Warming Solutions Act*:** AB 32, the Global Warming Solutions Act of 2006, codifies the State of California's GHG emissions target by directing CARB to reduce the state's global warming emissions to 1990 levels by 2020. Governor Schwarzenegger signed and passed into law AB 32 on September 27, 2006. Since that time, the CARB, the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), and the Building Standards Commission (BSC) have all been developing regulations that will help meet the goals of AB 32 and Executive Order S-3-05.[4]

[4] Note that AB 197 was adopted in September 2016 to provide more legislative oversight of CARB.

A Scoping Plan for AB 32 was adopted by CARB in December 2008. It contains the State of California's main strategies to reduce GHGs from business as usual (BAU) emissions projected in 2020 back down to 1990 levels. BAU is the projected emissions in 2020, including increases in emissions caused by growth, without any GHG reduction measures. The Scoping Plan has a range of GHG reduction actions, including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. This plan required CARB and other state agencies to develop and adopt regulations and other initiatives to reduce GHGs by 2012.

As directed by AB 32, CARB has also approved a statewide GHG emissions limit. On December 6, 2007, CARB staff resolved an amount of 427 MMT of CO_2e as the total statewide GHG 1990 emissions level and 2020 emissions limit. The limit is a cumulative statewide limit, not a sector-or facility-specific limit. CARB updated the future 2020 BAU annual emissions forecast because of economic downturn, to 545 MMT of CO_2e. Two (2) GHG emissions reduction measures currently enacted that were not previously included in the 2008 Scoping Plan baseline inventory were included, further reducing the baseline inventory to 507 MMT of CO_2e. Thus, an estimated reduction of 80 MMT of CO_2e is necessary to reduce statewide emissions to meet the AB 32 target by 2020.

CARB prepared an updated Scoping Plan which was released in 2017. The 2017 Scoping Plan identifies ways for California to reach the statewide 2030 climate target and next steps for reaching the 2050 target goal.

***Senate Bill 1368*:** SB 1368 is the companion bill of AB 32 and was signed by Governor Schwarzenegger in September 2006. SB 1368 required the CPUC to establish a greenhouse gas emission performance standard. Therefore, on January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard to help mitigate climate change. The Emissions Performance Standard is a facility-based emissions standard requiring all new long-term commitments for baseload generation to serve California consumers be with power plants that have emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO_2 per megawatt-hour. "New long-term commitment" refers to new plant investments (new construction), new or renewal contracts with a term of five (5) years or more, or major investments by the utility in its existing baseload power plants. Additionally, the CEC established a similar standard for local publicly owned utilities that cannot exceed the greenhouse gas emission rate from a baseload combined-cycle natural gas fired plant. On July 29, 2007, the Office of Administrative Law disapproved the CEC's proposed Greenhouse Gases Emission Performance Standard rulemaking action and subsequently, the CEC revised the proposed regulations. SB 1368 further requires that all electricity provided to California, including imported electricity, must be generated from plants that meet the standards set by the CPUC and CEC.

***Senate Bill 350 – Clean Energy and Pollution Reduction Act*:** In September 2015, the California Legislature passed SB 350, which increases the State's Renewables Portfolio Standard Program for content of electrical generation from the 33 percent target for 2020 to a 50 percent renewables target by 2030 (CPUC, 2025).

***Executive Order S-03-05*:** On June 1, 2005, Governor Schwarzenegger signed Executive Order S-03-05, the purpose of which was to implement requirements for the California Environmental Protection Agency (CalEPA) to provide ongoing reporting on a biennial basis to the State Legislature and Governor's Office on how global warming is affecting the state. Required areas of impact reporting include public

health, water supply, agriculture, coastline, and forestry. The CalEPA secretary is required to prepare and report on ongoing and upcoming mitigation designed to counteract these impacts.

***Executive Order B-30-15*:** On April 15, 2015, Governor Brown signed Executive Order B-30-15, the purpose of which is to establish a GHG reduction of 40 percent below 1990 levels by 2030. The Executive Order intended to help the state work towards a further emissions reduction target of 80 percent below 1990 levels by the year 2050. The order directed state agencies to prepare for climate change impacts through prioritization of adaptation actions to reduce GHG emissions, preparation for uncertain climate impacts through implementation of flexible approaches, protection of vulnerable populations, and prioritization of natural infrastructure approaches.

***Executive Order B-55-18 and SB 100 – 100 Percent Clean Energy Act of 2018*:** On September 10, 2018, Governor Brown signed both SB 100 – 100 Percent Clean Energy Act of 2018 and Executive Order B-55-18 To Achieve Carbon Neutrality. SB 100 sets California on course to achieving carbon-free emissions from the electric power production sector by 2045. SB 100 also increases the required emissions reduction generated by retail sales to 60 percent by 2030, an increase of 10 percent compared to previous goals. B-55-18 establishes a new goal of achieving statewide "carbon neutrality as early as possible and no later than 2045, and to achieve and maintain net negative emissions thereafter" (Governor Brown, 2018).

Local

Monterey Bay Air Resources District: To date, MBARD has not adopted regulations or CEQA guidance for analysis of GHG effects of land use projects; nor has it prepared a qualified GHG reduction plan for use or reference by local agencies. MBARD recommends utilizing thresholds set by neighboring districts, such as the SMAQMD. Therefore, the Proposed Project would be considered to result in a significant construction GHG related impact if the Proposed Project would emit more than 1,100 metric tons of CO_2e ($MTCO_2e$) per year (SMAQMD, 2020).

1982 Monterey County General Plan: There are no policies or goals from the 1982 Monterey County General Plan that would be applicable to the Proposed Project.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the regulation of greenhouse gas emissions. None of the greenhouse gas-related goals from the Carmel Area LUP may apply to the Proposed Project.

City's General Plan: The City's General Plan includes goals and policies related to the reduction of greenhouse gas emissions. The following policies from the City's General Plan may apply to the Proposed Project:

G7-3: To reduce release of airborne pollutants and contribution to green house gases.

O7-3: Promote planning and programs that result in the reduction of airborne pollutants.

P7-15: Continue to implement the City's Green Building Program requiring green building construction practices for both residential and nonresidential construction.

P7-18: Adopt and encourage sustainable practices that promote energy efficiency, improve air quality and preserve natural resources when consistent with the City's diverse design traditions.

Del Monte Forest Area LUP: There are no policies or goals from the Del Monte Forest Area LUP that would be applicable to the Proposed Project.

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 gases?	☐	☐	■	☐

Impact Discussion

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

The Proposed Project is in the NCCAB, where MBARD regulates air quality. For the purposes of this analysis, the SMAQMD's threshold of 1,100 $MTCO_2e$ is being utilized given the fact that MBARD has not yet adopted construction thresholds for GHG emissions. If a project emits less than 1,100 $MTCO_2e$ per year, its GHG emissions impact would be less-than-significant. The Proposed Project would generate temporary GHG emissions during construction activities. Detailed air quality modeling for construction of the Proposed Project was performed, as shown in **Appendix B**. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, which would require the use of mechanized equipment during construction that would emit GHGs. **Table 5** shows the Project's projected emissions of GHGs during construction.

Table 5
Construction Emissions of GHGs

Construction Phase	Annual Emissions ($MTCO_2e$/Year)
Site Preparation (2026)	39.80
Paving (2027)	38.43
Trenching (2026)	70.44
Trenching (2027)	172.1
Total Annual Construction Emissions:	320.77
Amortized Construction Emissions:[1]	10.69

Source: **Appendix B**
1. Amortized emissions are quantified based on an estimated 30-year project life.

As shown in **Table 5**, construction-period GHG emissions would be well below MBARD's threshold of 1,100 $MTCO_2e$ per year. As a result, the Proposed Project would have a less-than-significant impact from emissions of GHGs during construction.

The Proposed Project is a replacement of existing utilities and would not generate additional GHG emissions during operation compared to existing conditions. However, when accounting for the amortized construction GHG emissions over the lifetime of the proposed utility infrastructure, the

Proposed Project would generate an increase of 10.69 $MTCO_2e$/year of GHG of annual emissions. These amortized annual emissions would be well below MBARD's threshold of 1,100 $MTCO_2e$/year. As a result, the Proposed Project would have a less-than-significant impact from emissions of GHGs during construction.

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

As described above, the Proposed Project is not expected to generate GHG emissions that would exceed applicable thresholds. In addition, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, as the Proposed Project would not generate long-term emissions of GHGs. The Proposed Project would have a less-than-significant impact with regard to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

4.8 Hazards and Hazardous Materials

Environmental Setting

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

Review of the California Department of Toxic Substances Control's (DTSC) EnviroStor database and the State Water Resources Control Board's (SWRCB) GeoTracker database confirmed that the Proposed Project site is not a hazardous materials site and is not adjacent to any site considered an active hazardous materials site. According to the GeoTracker database, there is an open site assessment for potential contaminants of concern located at the Carmel Cleaners facility in the City, approximately 0.5 miles from the Pescadero Road site and 0.7 miles from the Carmel Woods site. The Proposed Project sites are located within 4.5 miles of the Monterey Regional Airport.

The Stevenson Lower and Middle School is located adjacent to the Pescadero Road site, and 0.5 miles from the Carmel Woods site. The next closest school is Carmel High School, which is one (1) mile away from the Proposed Project sites.

The Project does not include the use of significant quantities of hazardous materials. All fueling of construction equipment would occur at the WWTP's on-site refueling station or other construction staging areas. All refueling of construction equipment would occur at least 100 feet from riparian habitat, bodies of surface water, and any other areas that could potentially flow into bodies of surface water in the event of an accidental spill.

Government Code Section 65962.5 requires CalEPA to develop a Cortese List that is updated at least annually. While CalEPA no longer maintains a single Cortese List, CalEPA uses the following database and list to meet the requirements of Government Code Section 65962.5.

- List of Hazardous Waste and Substances sites from DTSC database.
- List of Leaking Underground Storage Tank (LUST) Sites from the SWRCB GeoTracker database.
- List of solid waste disposal sites identified by the SWRCB or a RWQCB with waste constituents above hazardous waste levels outside the waste management unit.
- List of "active" Cease and Desist Orders (CDO) and Clean-up and Abatement Orders (CAO) from the SWRCB.
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

Both Project sites are located in a local responsibility area (LRA) with a very high fire hazard and near a state responsibility area (SRA) with a very high fire hazard.

Regulatory Environment

Federal

Environmental Protection Agency: The EPA is responsible for enforcing regulations at the federal level pertaining to hazardous materials and waste. The primary federal hazardous materials and wastes laws are contained in the Resources Conservation and Recovery Act (RCRA) of 1976 and in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980.

Comprehensive Environmental Response, Compensation and Liability Act: CERCLA, more commonly known as Superfund, established the National Priorities List for identifying and obtaining funding for remediation of severely contaminated sites. Federal regulations pertaining to hazardous materials and wastes are contained in 40 CFR. The regulations contain specific guidelines for determining whether a waste is hazardous, based on either the source of generation or the characteristics of the waste.

U.S. Department of Transportation: The U.S. Department of Transportation (DOT) regulates transportation of hazardous materials by truck and rail. DOT regulations establish criteria for safe handling procedures. The California Administrative Code also includes federal safety standards.

Solid Waste Disposal Act/Federal Resource Conservation and Recovery Act**:** RCRA manages solid waste, landfills, and medical wastes. Under this act, solid wastes include hazardous materials. The act provides provisions for the generation, storage, treatment, and disposal of hazardous waste.

Toxic Substances Control Act: The Toxic Substances Control Act (TSCA), passed in 1976, requires the EPA to report, test, place restrictions on, and keep record of chemical substances and mixtures. The EPA has authority over the use, production, importation, and disposal of specific chemicals. Some chemicals include polychlorinated biphenyls (PCBs), asbestos, radon, and lead paint.

State

***California Environmental Protection* Agency:** The EPA has delegated much of its regulatory authority to individual states whenever adequate state regulatory programs exist. The DTSC Division of CALEPA is the

agency empowered to enforce federal hazardous materials and waste regulations in California, in conjunction with the EPA.

California hazardous materials and waste laws incorporate federal standards, but in many respects, are stricter. For example, the California Hazardous Waste Control Law, the State equivalent of RCRA, contains a much broader definition of hazardous materials and waste. The CCR, Titles 22 and 26, contain State hazardous materials waste laws. Regulations implementing the California Hazardous Waste Control Law list hazardous chemicals; establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe management of hazardous wastes; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in landfills.

Local

***1982 Monterey County General Plan Policies*:** The 1982 Monterey County General Plan includes goals and policies related to hazards and hazardous materials that could apply to the Proposed Project:

Objective 17.4: Reduce fire hazard risks to an acceptable level by regulating the type, density, location, and/or design and construction of development.

Objective 18.1: Reduce the level of risk from hazardous chemicals to an acceptable level by regulating the storage of hazardous chemicals.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to hazards and hazardous materials. The following goal from the Carmel Area LUP may apply to the Proposed Project:

2.7.4.6: The County shall require all new development to have adequate water available for fire suppression. The Fire Districts and the Planning and Building Inspection Department shall determine the adequacy and location of individual water storage to be provided.

City's General Plan: The City's General Plan includes goals and policies related to hazards and hazardous materials. The following policies from the City's General Plan may apply to the Proposed Project:

P5-188: Cooperate with regional and state agencies in the detection and elimination of illegal discharges of pollutants into Carmel Bay. Promote the proper disposal of pollutants to the sanitary sewer or hazardous waste facilities rather than the storm drainage system. Establish appropriate inspection criteria for new development and respond to complaints of illegal discharges. (LUP)

P8-19: Encourage new development located in or adjacent to fire hazard areas to incorporate fire preventative site design, access, landscaping and building materials, and other fire suppression techniques.

G8-3: Reduce potential impacts from hazardous materials.

O8-7: Minimize the generation of hazardous waste within the City and ensure that hazardous waste is transported and disposed of in a proper manner.

O8-8: Ensure that resources are available to effectively respond to hazardous-waste emergencies.

Del Monte Forest Area LUP: The Del Monte Forest Area LUP includes goals and policies related to hazards and hazardous materials. The following policies from the Del Monte Forest Area LUP may apply to the Proposed Project:

38: New development shall be sited and designed to minimize risk from geologic, flood, or fire hazards; to assure stability and structural integrity; and to not threaten the stability of a site, contribute significantly to erosion, geologic instability, or destruction of the site or surrounding areas. Areas that are subject to the highest category of fire hazard in the California Department of Forestry and Fire Protection Fire Hazard Rating System shall be considered unsuitable for development, unless it can be clearly demonstrated that design measures can adequately mitigate the fire hazard. Mitigation of hazards shall be demonstrated by detailed technical reports specific to the hazard type in question (e.g., soils, geologic, geotechnical, erosion control, fire hazard, etc.) that are prepared by persons who are appropriately qualified in the hazard field in question (e.g., civil engineers and engineering geologists familiar with coastal processes, geotechnical engineers, etc.) and that are submitted as part of any permit application. All technical reports shall be prepared consistent with County criteria for such reports (e.g., criteria for detail on seismic hazards are contained in the General Plan Safety Element; criteria for detail on fire hazards are based on the fire hazard rating system of the California Department of Forestry and Fire Protection; criteria for detail on shoreline hazards are based on Coastal Commission guidelines). All technical reports and analyses shall accompany development applications and/or be part of any required environmental documentation (e.g., that is associated with CEQA).

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 § 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 or excessive noise for people residing or working in the project area?	☐	☐	☐	■

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	■	☐

Impact Discussion

a/b. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The Proposed Project does not include the use of significant quantities of hazardous materials. However, construction equipment utilized for installation of new underground sewer main lines in both Project sites may require the use of or generate limited quantities of acutely hazardous materials, substances, or waste (such as fuels, solvents, etc.). The construction contractor would be required to implement BMPs for the use, storage, and transport of hazardous materials for fueling equipment and disposing of construction waste. All fueling of construction equipment would occur at the WWTP's on-site refueling station or other construction staging areas. All refueling of construction equipment would occur at least 100 feet from riparian habitat, bodies of surface water, and any other areas that could potentially flow into bodies of surface water in the event of an accidental spill. In addition, the Proposed Project would utilize fuel containment equipment (i.e., absorbent sheets and waddles) at the refueling site as a construction BMPs. The Proposed Project would not introduce new hazards or require the use, transport, or disposal of hazardous materials beyond those previously associated with the existing sewer main lines. Operation of the Proposed Project would include regular maintenance to minimize the potential for sewage leaks. However, this is consistent with CAWD's existing maintenance schedule. Furthermore, the anticipated maintenance schedule under Proposed Project conditions is anticipated to be less than existing conditions as the new sewer alignments would be more reliable and easier to access. As a result, the Proposed Project would have no impact with respect to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and/or reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction.

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

The Stevenson Lower and Middle School is located adjacent to the Pescadero Road site, and 0.5 miles from the Carmel Woods site. The next closest school is Carmel High School, which is located approximately one (1) mile away from the Proposed Project sites. While construction of the Proposed Project could require handling small quantities of hazardous or acutely hazardous materials, substances, or waste (such as fuels, solvents, etc.), the construction contractor would handle and store all such materials in accordance with applicable manufacturers' recommendations. Operation of the Proposed

Project would not require the handling of significant quantities of hazardous materials or result in the emission of hazardous materials. Therefore, the Proposed Project would have a less-than-significant impact regarding the emission or handling of hazardous materials within one-quarter mile of an existing school.

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

The SWRCB and the DTSC maintain databases of other hazardous material release sites with documented environmental contamination (DTSC, 2026). No hazardous materials release records are known to occur within the Proposed Project area based on a search of SWRCB and DTSC regulatory databases. No active hazardous materials sites are known to occur within the vicinity of the Proposed Project site. Therefore, the Proposed Project would have no impact related to being located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

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

The Proposed Project is located within 4.5 miles of the Monterey Regional Airport and is therefore not in the Monterey Regional Airport's Airport Influence Area. Since the Proposed Project is not located within an airport LUP area, the Proposed Project would have no impact related to this hazard.

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

The County of Monterey Multi-Jurisdictional Hazard Mitigation Plan does not identify specific designated evacuation routes, since evacuation routes are considered dynamic and would change based on the nature and location of an emergency. As a result, all local roadways within the Proposed Project area could potentially be utilized as evacuation routes during an emergency. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. A maximum of eight construction personnel may be present with an estimated eight trips per day, which would generate minimal additional traffic on local roadways in case of an emergency.

During construction in the Pescadero Road area, portions of Pescadero Road, Lincoln Street, and Monte Verde Streets in the vicinity of the work would be closed to all vehicle and pedestrian through traffic during working hours. Traffic would be routed around the work area through 1st Avenue, Dolores Street, and Castro Lane. Detours and road closures in the Carmel Woods Project site would be temporary and would vary as construction occurs. Although various impacts to vehicle and pedestrian access would occur, including lane closures and complete road closures, a Traffic Control Plan (TCP) would be developed to maintain access for local traffic in accordance with County requirements for encroachment permits. This would reduce potential interference with emergency response vehicles or emergency area evacuation resulting from proposed road or lane closures. In addition, lane or road closures from the Proposed Project would be short-term overall and would not be located in a single place for long periods of time due to the linear nature of the Proposed Project. The Proposed Project would not generate additional traffic once operational that could interfere with emergency response or evacuation.

Therefore, the Proposed Project would have a less-than-significant impact related to impairing implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Both Proposed Project components are located in an LRA mapped as a very high fire hazard and near a SRA mapped as a very high fire hazard (Monterey County, 2026). The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. Construction of the Proposed Project could result in sparks or other sources of ignition, constituting a temporary construction-related fire hazard. However, construction would comply with all applicable fire safety provisions, thereby reducing the risk of damage from fire to the maximum extent practicable. All mechanized construction equipment would be fitted with spark arrestors in compliance with all applicable State and local regulations, which would substantially reduce the risk of wildland fire as a result of construction. Although the Proposed Project borders the Del Monte Forest Area, all construction work involving mechanized equipment would be limited to the outlined existing paved roadways and would not exacerbate fire risk in the forest. Once operational, the Proposed Project would be located underground and would not expose people or structures to wildland fires. Therefore, the Proposed Project would have a less-than-significant impact related to a significant risk of loss, injury, or death involving wildland fires.

4.9 Hydrology and Water Quality

Environmental Setting

The Project is not located in any groundwater basin, although it is in the Carmel River Watershed. The nearest groundwater basin is the Carmel River Groundwater Basin, which is located about two (2) miles from the Proposed Project site and is managed by the Monterey Peninsula Water Management District (MPWMD). The Carmel Valley Groundwater Basin is designated by the California Department of Water Resources (DWR) as a medium priority basin (SWRCB, 2026). The Proposed Project is designated by the Federal Emergency Management Agency (FEMA) as Flood Zone X (Unshaded), located in an area with minimal flood hazards.

Regulatory Environment

Federal

***National Flood Insurance Program*:** FEMA established the National Flood Insurance Program (NFIP) to reduce flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRM) that identify Special Flood Hazard Areas (SFHA). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

***Porter-Cologne Water Quality Act*:** The Porter-Cologne Act delegates authority to the SWRCB to establish regional water quality control boards. The Central Coast RWQCB has authority to use planning, permitting, and enforcement to protect beneficial uses of water resources in the Project region. Under

the Porter-Cologne Water Quality Control Act (California Water Code Sections 13000 - 14290), the RWQCB is authorized to regulate the discharge of waste that could affect the quality of the State's waters, including projects that do not require a federal permit through the USACE. To meet RWQCB 401 Certification standards, all hydrologic issues related to a project must be addressed, including the following:

- Wetlands
- Watershed hydrograph modification
- Proposed creek or riverine related modifications
- Long-term post-construction water quality

Any construction or demolition activity that results in land disturbance equal to or greater than one (1) acre must comply with the Construction General Permit (CGP), administered by the SWRCB. The CGP requires the installation and maintenance of best management practices to protect water quality until the site is stabilized.

State

***Statewide Construction General Permit*:** The SWRCB has implemented an NPDES CGP for the State of California. For projects disturbing one (1) acre or more, a Notice of Intent (NOI) and SWPPP must be prepared by a qualified professional prior to commencement of construction. The CGP includes requirements for training, inspection, record keeping, and for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Local

***1982 Monterey County General Plan Policies*:** The 1982 Monterey County General Plan includes goals and policies related to hydrology and water quality that could apply to the Proposed Project:

Objective 5.1: Protect and preserve watersheds and recharge areas, particularly those critical for the replenishment of reservoirs and aquifers.

Policy 5.1.1: Vegetation and soil shall be managed to protect critical watershed areas.

Policy 5.1.2: Land use and development shall be accomplished in a manner to minimize runoff and maintain groundwater recharge in vital water resource areas.

Objective 5.2: Preserve vegetation where necessary to protect water ways from bank erosion and siltation.

Policy 5.2.1: Owners of property adjacent to waterways or responsible agencies shall be encouraged to maintain healthy vegetation along the drainage course, or provide other suitable means of preventing bank erosion or siltation.

Goal 16: To minimize the risk from the damaging effects of flooding and erosion.

Policy 16.2.4: All new development, including filling, grading, and construction, within designated 100-year floodplain areas shall conform to the guidelines of the National Flood Insurance

Program and policies established by the County Board of Supervisors, with the advice of the Monterey County Flood Control and Water Conservation District.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the regulation of hydrology and water quality. The following goals from the Carmel Area LUP may apply to the Proposed Project:

2.7.4.1: The County's primary means of minimizing risk from flood hazards shall be through land use planning. Open space uses such as agriculture, passive to low intensity recreation, and wildlife habitat are considered acceptable land uses in the 100-year floodplain.

2.7.4.5: Where development is allowed or structural flood control measures are required, restoration of waterway banks and disturbed areas to a natural vegetated appearance shall be required. Landscaping themes shall emphasize the use of native plants which are appropriate to riparian corridors. Revegetation of disturbed riparian corridors by planting of native trees shall be encouraged due to their role in absorbing and channeling the force of floods away from adjacent banks.

City's General Plan: The City's General Plan includes goals and policies related to the regulation of hydrology and water quality. The following policies from the City's General Plan may apply to the Proposed Project:

G1-6: Protect, conserve, and increase Carmel's available water resources and water quality. (LUP)

P1-115: Monitor the capacity of the Carmel Area Wastewater District for wastewater treatment. Ensure sufficient capacity is available for all projected development with priority given to uses consistent with the Coastal Act, including residential uses, and that this capacity is considered in all land use decisions.

P5-188: Cooperate with regional and state agencies in the detection and elimination of illegal discharges of pollutants into Carmel Bay. Promote the proper disposal of pollutants to the sanitary sewer or hazardous waste facilities rather than the storm drainage system. Establish appropriate inspection criteria for new development and respond to complaints of illegal discharges. (LUP)

Del Monte Forest Area LUP: The Del Monte Forest Area LUP includes goals and policies related to the regulation of hydrology and water quality. The following policy from the Del Monte Forest Area LUP may apply to the Proposed Project:

4: All development shall employ adequate erosion/sediment control and water quality construction best management practices (BMPs) during construction, and all such BMPs shall be in place prior to the commencement of construction and shall be maintained in good operating condition through the construction period.

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	■	☐

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site?	☐	☐	■	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	■	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	■	☐
iv) impede or redirect flood flows?	☐	☐	■	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	■	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	■

Impact Discussion

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Implementation of the Proposed Project would require approximately 3,400 cy of cut and 3,400 cy of fill, a total of 10,800 sf of trenching and ground disturbance, and newly paved impervious surfaces that could result in temporary water quality impacts. Replacement impervious surfaces would be installed such that drainage conditions are the same or better than pre-Project conditions. However, soil disturbance and newly paved areas could potentially generate minor additional runoff compared to existing conditions that could potentially degrade regional surface water and/or groundwater quality. However, the overall amount of newly paved surfaces represents a minor increase in impervious surface coverage compared to existing conditions and would not generate runoff in substantial quantities such that impacts to the quality of regional surface water or groundwater would occur.

In addition, water quality impacts could occur as a result of runoff from the use of hazardous materials (e.g., diesel fuel, gasoline, etc.) during Project implementation. The existing sewer main runs upslope from, and parallel to, Pescadero Creek and associated riparian corridor. The construction contractor would be required to implement BMPs for the use, storage, and transport of hazardous materials for fueling equipment and disposing of construction waste. To minimize water quality impacts, the contractor would be required to use the on-site refueling stations at the WWTP or other construction

staging areas. These refueling areas, as discussed previously, would be located at least 100 feet from surface waterways and/or riparian habitats to reduce impacts from potential spills, including impacts related to violation of water quality standards. All waste generated by the Project, including exported soil materials, would be disposed of in accordance with all waste discharge requirements. Therefore, the Project would have a less-than-significant impact related to violating applicable water quality standards or waste discharge requirements, or otherwise degrading the quality of surface water or groundwater.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project includes new/repaved impervious surfaces that could interfere with groundwater recharge. However, this paved area would largely encompass previously disturbed and developed roadways. The Proposed Project site is not located in a designated groundwater basin and therefore would not impact groundwater recharge. Given the relatively small area of disturbance and minor increase of new/repaved impervious surfaces compared to existing conditions, the Proposed Project would not substantially interfere with groundwater recharge. The Project would not introduce any new water uses that could substantially decrease groundwater supplies. The Proposed Project would have a less-than-significant impact from interfering with groundwater recharge or decreasing groundwater supplies.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) Result in substantial erosion or siltation on-or-off site, ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off site, iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or iv) impede or redirect flood flows?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project would not result in new impervious surfaces that would result in a substantial increase in additional runoff that would exceed the capacity of existing or planned stormwater systems or substantially alter the existing drainage pattern of the Project sites. The Proposed Project would not substantially increase the rate or amount of service runoff or impede or redirect flood flows. The Proposed Project includes installation of new utility lines that that could result in increased erosion or siltation on-or-offsite during construction. However, the Proposed Project would implement BMPs, as discussed in **Section 4.6, Geology and Soils,** during construction to reduce erosion and the loss of topsoil. In addition, these impacts would be limited to the construction period, and no operational impacts would occur as the utility lines would be installed underground. Therefore, the Proposed Project would have a less-than-significant impact with regard to substantial alteration of existing drainage pattern of the Project site.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The Proposed Project site is located outside of the tsunami hazard zone as delineated by the California DOC (DOC, 2026). Therefore, the Proposed Project would not result in the risk of pollutants due to

inundation from a tsunami. There are no stationary bodies of water located in the vicinity of the Proposed Project. As a result, the Proposed Project would not result in the risk or release of pollutants due to inundation from a seiche.

The Proposed Project sites are located within FEMA Flood Zone X (Unshaded) and is therefore considered to be in a low flood hazard area (Monterey County, 2026). Therefore, it is unlikely that flooding of the Proposed Project sites during construction would risk pollutant release. In addition, all Project materials that could release pollutants in the event of flooding would be stored and maintained in accordance with all manufacturer specifications to prevent the risk of pollutant release. All potential sources of pollutants associated with construction of the Proposed Project would be removed from staging areas following completion of Project activities. Once operational, the Proposed Project components would be located underground and the risk of pollutant release due to flooding would be minimal. For these reasons, the Proposed Project would have a less-than-significant impact related to the risk of pollutant release due to site inundation by flooding.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Proposed Project is not located in a designated groundwater basin and therefore would not impact groundwater recharge. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and does not include any new development or new impervious surfaces that could potentially conflict or obstruct with implementation of a water quality control plan. Therefore, no impact would occur.

4.10 Noise

Environmental Setting

Noise is generally defined as sound that is loud, disagreeable, or unexpected. Sound is mechanical energy transmitted in the form of a wave because of a disturbance or vibration. Sound levels are described in terms of both amplitude and frequency. Airborne sound is a rapid fluctuation of air pressure above and below atmospheric pressure. Sound levels are usually measured and expressed in decibels (dB) using the A-weighted sound pressure level (dBA) with 0 dB corresponding to the threshold of hearing. The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by three dB; dividing the energy in half would result in a three dB decrease (Caltrans, 2013). **Table 6** provides typical noise levels for construction equipment at distances of 50, 100, 200, and 400 ft.

Table 6
Construction Equipment Noise Emission Levels

Equipment	Typical Noise Level (dBA) 50 feet from Source	Typical Noise Level (dBA) 100 feet from Source[1]	Typical Noise Level (dBA) 200 feet from Source[1]	Typical Noise Level (dBA) 400 feet from Source[1]
Air Compressor	81	75	69	63

Equipment	Typical Noise Level (dBA) 50 feet from Source	Typical Noise Level (dBA) 100 feet from Source[1]	Typical Noise Level (dBA) 200 feet from Source[1]	Typical Noise Level (dBA) 400 feet from Source[1]
Backhoe	80	74	68	62
Ballast Equalizer	82	76	70	64
Ballast Tamper	83	77	71	65
Compactor	82	76	70	64
Concrete Mixer	85	79	73	67
Concrete Pump	82	76	70	64
Concrete Vibrator	76	70	64	58
Dozer	85	79	73	67
Generator	81	75	69	63
Grader	85	79	73	67
Impact Wrench	85	79	73	67
Jack Hammer	88	82	76	70
Loader	85	79	73	67
Paver	89	83	77	71
Pneumatic Tool	85	79	73	67
Pump	76	70	64	58
Roller	74	68	62	56

Source: DOT, Transit Noise and Vibration Impact Assessment, 2006
Note: Construction generated noise levels drop off at a rate of about six (6) dBA per doubling of distance between the source and receptor.

The County General Plan provides land use compatibility guidelines for community noise levels. Normally acceptable noise levels range between 50 and 60 dBA for single-family residential land uses and between 50 and 70 dBA for neighborhood parks, schools, and commercial uses (Monterey County, 2010). Additional guidance for noise is provided by the Caltrans 2018 *Standard Specifications* document (Section 14-8.02A), which suggests that construction equipment should not exceed 86 dBA L_{max} at a distance of 50 feet from job site activities between 9:00 PM to 6:00 AM. Furthermore, the MCC prohibits the operation of machinery that exceeds 85 dBA at 50 feet at any time of day.

Ground-borne vibration consists of the oscillatory waves that move from a source through the ground to adjacent buildings or structures and vibration energy may propagate through the buildings or structures. Vibration may be felt, may manifest as an audible low-frequency rumbling noise (referred to as ground-borne noise), and may cause windows, items on shelves, and pictures on walls to rattle. The primary concern from vibration under CEQA is that it can be intrusive and annoying to building occupants at vibration-sensitive land uses and may cause structural damage.

Ground-borne vibration generated by manmade activities typically attenuates rapidly as distance from the source of the vibration increases. Vibration amplitudes are usually expressed in peak particle velocity (PPV). The PPV is normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal and is often used to measure potential damage to structures as a result of ground-borne vibration. High levels of ground-borne vibration may cause damage to nearby buildings or structures; at lower levels, ground-borne vibration may cause minor cosmetic (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction,

demolition, drilling, or excavation. **Table 7** summarizes the vibration damage criteria recommended by the FTA for evaluating the potential for architectural damage to buildings. Vibration criteria related to human annoyance potential is provided in **Table 8**.

Table 7
Guideline Vibration Damage Potential Threshold Criteria (PPV)

Structure and Condition	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: AMBIENT, 2026

Table 8
Guideline Vibration Annoyance Potential Criteria (PPV)

Human Response	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

Source: AMBIENT, 2026

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and would result in temporary noise and ground-borne vibration during construction activities. The Proposed Project site is located in unincorporated Monterey County between the City and Del Monte Forest. Sensitive noise receptors within 25 feet of the vicinity of the Proposed Project include private residences.

Regulatory Environment

State

The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria.

***California General Plan Guidelines*:** The State of California General Plan Guidelines, published by the Governor's Office of Land Use and Climate Innovation (LCI) (formerly the Office of Planning and Research), also provides guidance for the acceptability of projects in specific CNEL/Ldn contours. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. For multi-family land uses, the State of California General Plan Guidelines identify a "normally acceptable" exterior noise level of up to

65 dBA CNEL/Ldn. Multi-family land uses are considered "conditionally acceptable" in noise environments of 60 to 70 dBA CNEL/Ldn, "normally unacceptable" in exterior noise environments of 70 to 75 CNEL/Ldn, and "clearly unacceptable" in exterior noise environments exceeding 75 dBA CNEL/Ldn. Assuming a minimum exterior-to-interior noise reduction of 25 dB, an exterior noise environment of 70 dBA CNEL/Ldn would allow for a normally acceptable interior noise level of 45 dBA CNEL/Ldn.

***California Code of Regulations*:** The California Commission of Housing and Community Development officially adopted noise insulation standards in 1974. In November 1988, the BSC approved revisions to these standards (Title 24, Part 2, CCR). Title 24 requires interior noise levels attributable to exterior sources must not exceed 45 dB in any habitable room. Additionally, the code specifies that multi-family residential buildings or structures that will be located in exterior CNEL (or Ldn) contours of 60 dBA, or greater, of sources such as a freeway, expressway, parkway, major street, thoroughfare, airport, rail line, rapid transit line or industrial noise source shall require an acoustical analysis showing that the building has been designed to limit intruding noise to an interior CNEL (or Ldn) of 45 dBA. Predictions must also be made for future noise levels for a period of at least 10 years from the time of building permit application.

Local

1982 Monterey County General Plan: The 1982 Monterey County General Plan includes goals and policies related to noise that could apply to the Proposed Project:

Objective 22.2: Ensure, through land use planning, a quiet acoustic environment in portions of the County to be developed.

Policy 22.2.1: The County shall require new development to conform to the noise parameters established by Table 6, Land Use Compatibility for Exterior Community Noise Environments.

Policy 22.3.1: The County shall develop cooperative working relationships between those uses that produce noise and those that are sensitive to noise to mitigate existing noise problems.

***Carmel Area LUP*:** None of the goals and policies related to noise standards from the Carmel Area LUP will apply to the Proposed Project.

City's General Plan: The City's General Plan includes the following goals and policies related to noise that could apply to the Proposed Project:

G9-1: Preserve Carmel's overall quiet environment; reduce noise in Carmel to levels compatible with the existing and future land uses and prevent the increase of noise levels in areas where noise sensitive uses are located.

O9-3: Control unnecessary, excessive and annoying noises within the City where not preempted by Federal or State control.

Del Monte Forest Area LUP: There are no policies or goals from the Del Monte Forest Area LUP that would be applicable to the Proposed Project.

Monterey County Code: Chapter 10.60 of the MCC enforces construction and operational noise regulations. MCC Section 10.60.030 prohibits the operation of machinery that exceeds 85 dBA at 50 feet at any time of day. MCC Section 10.60.040 limits nighttime noise levels to 45 dBA L_{eq} and 65 dBA L_{max} at 50 feet between 9:00 p.m. and 7:00 a.m. MCC Section 10.60.040(C) provides exemptions to compliance

with the exterior nighttime noise level standards, including for equipment used in an emergency, which is defined as a situation arising from fire, explosion, act of God, or act of public enemy which, if not corrected immediately, will potentially result in the loss of life, property or substantial environmental resources. However, there is no exemption provided for nighttime construction noise. The MCC does not include quantitative standards for ground-borne vibration.

City's Municipal Code: Section 8.56 of the City's Municipal Code specifies that "Class B" noise (including but not limited to noise created by power equipment and tools, appliances, workshops, vehicle repairs and testing, and construction projects) shall not be created or emitted between the hours of 6:30 P.M. of one day and 8:00 A.M. of the following day. The City does not have a quantitative threshold for construction noise.

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

Impact Discussion

a. Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Proposed Project construction activities would generate temporary noise, exposing sensitive receptors located directly adjacent to the Proposed Project sites to increased noise levels. The Proposed Project would involve the limited use of mechanized equipment, including excavators, dump trucks, backhoes, delivery trucks, pipe fusing equipment, asphalt pavers, a winch/pulling unit and cable with bursting head, and a water truck, which may result in increased noise levels at sensitive receptors during implementation of the Proposed Project. Typical noise levels for these equipment types are provided in **Table 6**, above. Due to the linear nature of the Proposed Project, noise generated from construction would not be located in a single location for extended period of time.

MCC Section 10.60.030 prohibits the operation of machinery that exceeds 85 dBA at 50 feet at any time of day. These thresholds are relied upon for the entire Project, including work taking place within City limits, since the City does not have an adopted quantitative noise threshold for construction noise. The nearest sensitive receptors are single-family residences that are located within approximately 25 feet of

the Proposed Project sites, as well as the Stevenson Lower and Middle School, located approximately 50 feet from the Pescadero Road Project site. These sensitive residential receptors would be exposed to noise from construction activities during the course of Project construction. Given the proximity of sensitive receptors to the Proposed Project sites, this analysis assumes a threshold of 85 dBA at 25 feet rather than the established threshold of 85 dBA at 50 feet. This represents a conservative analysis because 85 dBA would attenuate to approximately 79 dBA at 25 feet.

Construction noise was estimated using the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (FHWA, 2006). The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites and would have a lower long-term noise average than a development project located at a single location due to the linear nature of the Project, as work would not remain concentrated in single locations for extended periods of time. As discussed above, Project construction could occur within approximately 25 feet of sensitive residential receptors, and approximately 50 feet from educational receptors. For the purposes of this analysis, the loudest piece of construction equipment (paver) was evaluated at a distance of 25 feet from the nearest sensitive receptor. Under this scenario, the hourly noise level at 50 feet from the construction area is calculated to be 83 dBA L_{eq}. Therefore, at the nearest noise-sensitive receivers to the Project area (approximately 25 feet), pipeline construction activities would generate maximum hourly noise levels up to 88 dBA L_{eq}. This would exceed the threshold of 85 dBA at 25 feet, which could result in a potentially significant temporary noise impact from construction. Implementation of **Mitigation Measure NOI-1** would minimize construction noise levels to below the MCC construction threshold and would reduce potentially significant impacts from temporary construction noise to sensitive receptors to a less-than-significant level.

> **Mitigation Measure NOI-1**: During Project construction, the Project contractor shall ensure that construction noise levels at the adjacent single-family residential uses are reduced to a noise level not to exceed the MCC's construction noise threshold of 85 dBA L_{eq} and shall implement the following measures:
>
> - At the construction area, provide a sign that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager respond to and investigate noise complaints and take corrective action, if necessary, in a timely manner.
> - If a noise complaint(s) is registered, the contractor and CAWD shall conduct noise measurements at the use(s) that registered the complaint and modify the means and methods of construction to maintain noise levels below the 85 dBA at 25 feet threshold.
> - The following measures may also be used to reduce noise levels:
>   - The use of bells, whistles, alarms, and horns shall be restricted to safety warning purposes only.
>   - Noise-reducing enclosures shall be used around stationary noise-generating equipment (e.g., compressors and generators) or located as far from sensitive receptors, as feasible.

No increase in ambient noise levels is expected during operation of the Proposed Project since all Project components would be located underground and would not generate any noise. No impact from an increase in operational noise levels would occur as a result of the Proposed Project.

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

The Proposed Project would involve the limited use of mechanized equipment, including excavators, dump trucks, backhoes, delivery trucks, pipe fusing equipment, asphalt pavers, a winch/pulling unit and cable with bursting head, and a water truck, which may result in increased noise and ground-borne vibration levels at sensitive receptors during implementation of the Proposed Project. The Proposed Project is located within approximately 25 feet adjacent to residences throughout most of the roadways within the Proposed Project sites, therefore potentially impacting sensitive receptors during construction. The use of mechanized equipment during Project construction would generate increased temporary ground-borne vibration. The Proposed Project would include the use of loaded trucks, which could generate vibration levels at or exceeding 0.076 PPV at nearby buildings. This would be below the 0.12 PPV that could potentially result in structural damage to buildings adjacent to the Proposed Project sites (**Table 6**) and below the "distinctly perceptible" range of 0.25 PPV for transient sources of vibration and the "strongly perceptible" range of 0.10 PPV for continuous sources of vibration (**Table 7**). Use of equipment producing greater ground-borne vibration (i.e. roller compactor, bulldozers, etc.) is not proposed. In addition, due to the linear nature of the Proposed Project, noise and ground-borne vibration generated from construction would not be located in a single location for extended period of time. As a result, ground-borne vibration from Project construction would be below applicable Caltrans thresholds for ground-borne vibration.

Once operational, the Proposed Project would be located underground and would not generate a substantial permanent increase in noise levels or produce substantial groundborne vibration compared to existing conditions. Therefore, the Proposed Project would have a less-than-significant impact with regards to the generation of excessive groundborne vibration or groundborne noise levels.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

There are no active airports within two miles of the Project site. The Monterey Regional Airport is located approximately 4.5 miles from the Carmel Woods Project site. As result, the Proposed Project would have no impact from exposing people residing or working in the Project area to excessive noise levels from airport operation.

4.11 Public Services

Environmental Setting

The majority of the Proposed Project is located in unincorporated Monterey County and is served by the Monterey County Sheriff's Office for police protection and the Cypress Fire Protection District for fire protection services. Although the Carmel Police Department is the nearest police department and serves the City, the Carmel Police Department could reasonably be expected to respond to an emergency taking place at the Proposed Project sites.

The Proposed Project is not located on any State Parks property. There are no County parks surrounding the Proposed Project sites. Forest Hill Park, operated by the City, is located about 0.2 miles south of the Pescadero Road Project site and 0.5 miles south of the Carmel Woods Project site. There are no other

recreational facilities located on the Project site or surrounding area. The Carmel Unified School District (CUSD) serves the schools within the Project area. The closest school is the Stevenson Lower and Middle School, which is located adjacent to the Pescadero Road site and 0.5 miles from the Carmel Woods site. The next closest school is Carmel High School, which is one mile away from the Proposed Project sites. Additionally, the Community Hospital of the Monterey Peninsula is located about 0.6 miles from the Carmel Woods Project site and one mile from the Pescadero Road Project site. No other public facilities are located on the Proposed Project sites.

Regulatory Environment

Local

***1982 Monterey County General Plan*:** None of the policies provided in the 1982 County General Plan related to public services are applicable to the Proposed Project.

***Carmel Area LUP*:** None of the policies provided in the Carmel Area LUP related to public services are applicable to the Proposed Project.

City's General Plan: The following policy from the City's General Plan could apply to the Proposed Project:

O6-2: Support adequate levels of public services and facilities to serve the needs of the community, including police and fire protection, refuse and sanitary disposal services, building safety and public utility services.

Del Monte Forest Area LUP: There are no policies or goals from the Del Monte Forest Area LUP related to public services that would be applicable to the Proposed Project.

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	☐	☐	■	☐
a) Fire Protection?	☐	☐	■	☐
b) Police Protection?	☐	☐	■	☐
c) Schools?	☐	☐	☐	■
d) Parks?	☐	☐	☐	■
e) Other public facilities?	☐	☐	☐	■

Impact Discussion

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

a. Fire Protection?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project would not require the provision or the need for new or altered fire protection facilities since it consists of modifications to existing sewer infrastructure. Although most of the Project construction work would take place underground, temporary road closures and/or detours would be required due to the limited width of affected roadways.

During construction in the Pescadero Road area, portions of Pescadero Road, Lincoln Street, and Monte Verde Streets in the vicinity of the work would be closed to all vehicle and pedestrian through traffic during working hours. Traffic would be routed around the work area through 1st Avenue, Dolores Street, and Castro Lane. Detours and road closures in the Carmel Woods Project site would be temporary and would vary as construction occurs due to the linear nature of Project construction. The Proposed Project would require temporary lane closures due to the work within existing local roadways. This may have an impact on fire protection facilities due to accessibility and response times. However, although various impacts to vehicle and pedestrian access would occur, including lane closures and complete road closures, a TCP would be developed to maintain access for traffic in accordance with County requirements for encroachment permits. This would reduce potential interference with emergency response vehicles or emergency area evacuation resulting from proposed road or lane closures. In addition, lane or road closures from the Proposed Project would be short-term overall and would not be located in a single place for long periods of time due to the linear nature of the Proposed Project. Once operational, there would be no impact to fire protection services. Therefore, the Proposed Project would have a less-than-significant impact on acceptable service ratios, response times, or other performance objectives for fire protection services.

b. Police Protection?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project would not require the provision or the need for new or altered fire protection facilities since it consists of modifications to existing sewer infrastructure. Although most of the Project construction work would take place underground, temporary road closures and/or detours would be required due to the limited width of affected roadways.

During construction in the Pescadero Road area, portions of Pescadero Road, Lincoln Street, and Monte Verde Streets in the vicinity of the work would be closed to all vehicle and pedestrian through traffic during working hours. Traffic would be routed around the work area through 1st Avenue, Dolores Street, and Castro Lane. Detours and road closures in the Carmel Woods Project site would be temporary and would vary as construction occurs due to the linear nature of Project construction. The Proposed Project would require temporary lane closures due to the work within existing local roadways. This may have an impact on police protection facilities due to accessibility and response times. However, although various impacts to vehicle and pedestrian access would occur, including lane closures and complete road closures, a TCP would be developed to maintain access for traffic in accordance with County requirements for encroachment permits. In addition, lane or road closures from the Proposed Project

would be short-term overall and would not be located in a single place for long periods of time due to the linear nature of the Proposed Project. Once operational, there would be no impact to police protection services. Therefore, the Proposed Project would have a less-than-significant impact on acceptable service ratios, response times, or other performance objectives for police protection services.

c. Schools?

The nearest schools to the Proposed Project sites is the Stevenson Lower and Middle School, which is located adjacent (within approximately 50 feet) to the Pescadero Road Project site and approximately 0.5 miles from the Carmel Woods Project site. The next closest school is Carmel High School, which is one mile away from the Proposed Project sites. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. New utility installation would be limited to the outlined residential roadways and would not impact the operation of the Stevenson Lower and Middle School or any other educational facilities. The Proposed Project is a replacement of existing wastewater utility lines and would not facilitate population growth that would indirectly increase demand for educational services and result in impacts to schools. No impact would occur on existing school facilities as a result of the Proposed Project.

d. Parks?

The Mission Trail Nature Preserve, located in and operated by the City, is located approximately 1.5 miles south of the Proposed Project sites. Forest Hill Park, also operated by the City, is located about 0.2 miles south of the Pescadero Road Project site and 0.5 miles south of the Carmel Woods Project site. The Proposed Project is not located on any State Parks property (Monterey County, 2026). The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. In addition, once operational, the Proposed Project would be located underground and would not impact any current or future parks facilities in the surrounding area. Therefore, there would be no impact on existing park facilities as a result of the Proposed Project.

e. Other public facilities?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and would have no impact on public facilities. The Community Hospital of the Monterey Peninsula is located about 0.6 miles from the Carmel Woods Project component and one mile from the Pescadero Road Project component; however, the Proposed Project sites would be limited to the outlined roadways and would not impact the hospital. There are no other public facilities located around the Proposed Project site. In addition, once operational, the Proposed Project would be located underground and would not impact any current or future public facilities in the surrounding area. Therefore, there would be no impact to other public facilities.

4.12 Transportation

Environmental Setting

The Proposed Project is located in unincorporated Monterey County between the City and Del Monte Forest. The Pescadero Road site is located along Pescadero Road, Lincoln Street, 2nd Avenue, and Monte Verde Street. The Carmel Woods site is located along Camino Del Monte, San Juan Road, San Marcos Road, San Lucas Road, Portola Avenue, San Luis Road, South San Luis Road, San Pedro Lane, San Mateo Avenue, Carpenter Street, and along Highway 1 in the Carmel Woods residential area, directly northwest of the Pescadero Road area, between Highway 1 and 17 Mile Drive, bounded by Camino Del Monte in the south. The Proposed Project would be constructed within a paved and previously disturbed area that contains existing sewer infrastructure. The roadways are primarily used as local access routes for the nearby residential neighborhoods. Regional access to both Proposed Project sites is provided from SR 1. Local access to the Project sites is provided by Camino Del Monte, Carpenter Street, Pescadero Road, and Monte Verde Street. Monterey-Salinas Transit (MST) provides public transit services in the Project area. Bus routes serving the Project area include Lines 91 and 94 (limited-service routes), as well as Line 5, which operates in the broader vicinity of the Proposed Project and connects the City to downtown Monterey and Carmel Valley.

Regulatory Environment

State

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

Local

***1982 Monterey County General Plan*:** None of the policies provided in the 1982 County General Plan related to transportation are applicable to the Proposed Project.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the regulation of transportation. None of the transportation-related goals from the Carmel Area LUP may apply to the Proposed Project.

City's General Plan: The City's General Plan includes the following goals and policies related to the regulation of transportation that could apply to the Proposed Project:

O2-3: Preserve and enhance the qualities that contribute to the residential character of the community, including quiet neighborhoods, low levels of illumination, lack of nighttime activity, safe environment, pedestrian use of streets, and maintenance of property values by mitigating the adverse impacts of high volume through-traffic. (LUP)

P2-15: Recognize that the impact of a large number of non-resident vehicles including tourist buses is not consistent with the residential character of Carmel. Mitigate impacts on visual quality, circulation, and ambience to the extent possible. (LUP)

Del Monte Forest Area LUP: There are no policies or goals from the Del Monte Forest Area LUP related to the regulation of transportation that would be applicable to the Proposed Project.

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

Impact Discussion

a. Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Both Proposed Project components are located in residential areas. Proposed Project construction would occur within the existing roadways and public ROWs. During construction in the Pescadero Road area, portions of Pescadero Road, Lincoln Street, and Monte Verde Streets in the vicinity of the work would be closed to all vehicle and pedestrian through traffic during working hours. Traffic would be routed around the work area through 1st Avenue, Dolores Street, and Castro Lane. Detours and road closures in the Carmel Woods Project site would be temporary and would vary as construction occurs. As discussed previously, the road closures as part of the Proposed Project would be conducted in accordance with the requirements of a County encroachment permit, including but not limited to preparation of a TCP. The TCP would address the construction schedule, street closures and/or detours, construction staging areas and parking, and planned truck routes. Construction is a short-term, temporary activity and construction trips would account for a relatively small portion of existing traffic on area roadways. Therefore, the Proposed Project would have a less-than-significant impact related to conflicting with programs, plans, ordinances, or policies related to circulation on area roadways.

The Proposed Project sites do not contain any dedicated bicycle lanes; instead, bicycle riders in the area would utilize public roadways. Bicycle travel on area roadways would be temporarily impacted by work in public roadways as described above. The TCP would identify any closures or detours specific to bicycle traffic. Once operational, the Proposed Project would be located underground and would not interfere with bicycle travel in the Project area. Therefore, the Proposed Project would have a less-than-

significant impact related to conflicting with programs, plans, ordinances, or policies related to circulation on bicycle facilities.

Limited pedestrian facilities are located throughout the Proposed Project sites. Work within the roadway could potentially also require the closure of pedestrian facilities such as sidewalks. The TCP would identify any closures or detours specific to pedestrian traffic. Once operational, the Proposed Project would be located underground and would not interfere with pedestrian foot-travel in the Proposed Project area. Therefore, the Proposed Project would have a less-than-significant impact related to conflicting with programs, plans, ordinances, or policies related to circulation on pedestrian facilities.

MST provides public transit services within the Project area as discussed previously. Work within the roadway could potentially also require the temporary rerouting of public transit services within the Project area. The TCP would identify any closures or detours specific to public transit. Once operational, the Proposed Project would be located underground and would not interfere with public transit in the Project area. Therefore, the Proposed Project would have a less-than-significant impact related to conflicting with programs, plans, ordinances, or policies related to circulation on public transit facilities.

Based on the discussion above, implementation of the TCP in compliance with the terms of a County encroachment permit would reduce potential impacts from the Proposed Project to a less-than-significant impact related to potential conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The Proposed Project would result in a nominal increase in traffic associated with construction activities. CEQA Guidelines Section 15064.2 subdivision (b)(1) calls for the evaluation of transportation impacts of projects based on VMT. CEQA uses the VMT metric to evaluate a project's transportation impacts. The County has not yet adopted VMT thresholds. In the absence of County VMT standard metrics, this IS/MND relies on the LCI's recommended small project screening threshold to determine whether the Proposed Project's VMT effects would be significant. The Proposed Project would result in a significant traffic-related effect if the Proposed Project would generate more than 110 daily trips.

The Proposed Project would result in temporary increases in traffic during construction. A maximum of eight construction personnel may be present with an estimated 16 trips per day (assuming two one-way vehicle trips per worker per workday, with no carpooling).

Vehicles would bring mechanized equipment, including excavators, dump trucks, backhoes, delivery trucks, pipe fusing equipment, asphalt pavers, a winch/pulling unit and cable with bursting head, and a water truck, to the Project site. Equipment may be delivered all at once or deliveries could take place on an as-needed basis over the course of Project construction. Equipment would be stored on site throughout construction until no longer required. Based on the construction schedule of 16 months and the temporary nature of Project construction, construction traffic would not exceed the threshold of 110 daily trips. Therefore, this impact would be less-than-significant.

Following completion of the Project, operational maintenance is projected to be less than existing conditions due to the increased reliability of the new sewer lines. Any regular maintenance would be included in CAWD's existing maintenance schedule for their collection system, and no new trips would

be required. Therefore, anticipated operational traffic trips would be well below the threshold of 110 daily trips. This would be a less-than-significant impact.

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

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project would occur along existing roadways at both of the Proposed Project sites and does not include any new roadway features that would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersection) or incompatible uses. Temporary road closures as part of the Proposed Project could result in the temporary introduction of incompatible uses (construction equipment) on public roadways or hazards from detour routes. However, the Proposed Project would be required to remedy any potential hazards and/or introduction of incompatible uses as part of the TCP preparation process to meet County requirements for an encroachment permit. Disturbed roadways would be restored to previous conditions following construction. Furthermore, the Proposed Project would be located underground during operation and would not create a permanent geometric design feature. Therefore, the Proposed Project would have a less-than-significant impact from creating a geometric design feature or introducing incompatible uses to public roadways.

d. Would the project result in inadequate emergency access?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project could temporarily limit emergency access due to temporary road closures. Public roadways at the Pescadero Road Project site (Pescadero Road, Lincoln Street, Monte Verde Street, etc.) would be temporarily closed at various times and locations throughout construction to vehicle and pedestrian traffic during working hours. Detours and road closures would also occur in the Carmel Woods Project site and would vary as construction occurs. Traffic would be routed around the work area through 1st Avenue, Dolores Street, and Castro Lane in accordance with the Project's TCP developed as part of the County's encroachment permit process. Adherence to the TCP would reduce impacts related to inadequate emergency access during construction of the Proposed Project. Furthermore, all impacts to emergency access would be temporary and all Project area roadways would be restored to existing or better conditions following completion of construction. Therefore, the Proposed Project would have a less-than-significant impact in regard to emergency access.

4.13 Tribal Cultural Resources

Albion Environmental, Inc. (Albion) prepared a Phase I Cultural Resource Inventory and AB 52 Consultation for the Project sites in January 2026. The Phase I Cultural Resource Inventory includes the results of background research and field reconnaissance of the Proposed Project area. Background research consisted of a records search from CHRIS, the NWIC, and a SLF search, followed by a pedestrian archaeological field survey of the Project area. The field reconnaissance consisted of a pedestrian survey of the Project area between January 19 and 21, 2026, which investigated the Project area for cultural and TCRs. See **Section 4.4, Cultural Resources** for additional discussion.

CAWD sent out tribal consultation letters pursuant to AB 52 based on NAHC's tribal stakeholder consultation list on October 1, 2025. A sample outreach letter is provided in **Appendix F**. In addition,

CAWD conducted additional outreach via email on November 3, 2025. CAWD received a request to consult on the Proposed Project from the Costanoan Rumsen Carmel Tribe on February 11, 2026. CAWD also received a request to consult on the Proposed Project from the Esselen Tribe of Monterey County on October 22, 2025. The representatives of the Esselen Tribe of Monterey County expressed their concerns related to potential inadvertent discovery of tribal resources, especially along Pescadero Canyon, during the Proposed Project. The KaKoon Ta Ruk Band of Ohlone-Costanoan Indians of the Big Sur Rancheria expressed concerns about potential cultural resources on the Project site, but stated that they did not have the resources to send a monitor. The KaKoon Ta Ruk Band of Ohlone-Costanoan Indians of Big Sur Rancheria requested that a Treatment Protocol be included in the Project's mitigation measures, and requested updates regarding the Proposed Project. The Ohlone/Costanoan-Esselen Nation also requested consultation on February 11, 2026.

CAWD conducted initial consultation meetings with the Costanoan Rumsen Carmel Tribe, the Esselen Tribe of Monterey County, and the Ohlone/Costanoan-Esselen Nation on April 2, April 8, and April 16, 2026, respectively. All of the tribes indicated their interest in the Project area and referenced that TCRs were located in the Project area. Specific resources and locations of resources were not identified during the initial consultation meetings.

Environmental Setting

Regional History

Prior to Euro-American contact, the area now known as Monterey County was inhabited by native speakers of the Costanoan, Esselen, and Salinan languages. The traditional way of life for the native inhabitants was largely destroyed in the 1760s with the arrival of Euro-Americans.

The Ohlone inhabited a large range along the coast of California that extended from the San Francisco Peninsula south to the Monterey Peninsula and included inland areas from the Santa Clara Valley through San Juan Batista. While first contact between Indigenous communities and Europeans took place in 1542, European settlement began in the 1760's when the Spanish established colonies. The establishment of Misión San Carlos de Borromeo de Carmelo marked the beginning of a period of intense Native American conversion to Catholicism. After Mexico gained its independence from Spain in 1820, the government granted most land around Monterey to wealthy Mexican families as large tracts of lands known as ranchos. Following the 1846 capture of California by the United States, industry in the Salinas Valley shifted away from grazing lands and towards agriculture. As the competition for land increased with the arrival of Anglo settlers, Native American communities continued to disappear.

Regulatory Environment

State

California Public Resources Code: Several sections of the California PRC protect cultural resources located on public land. Under PRC Section 5097.5, no person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site (including fossilized footprints), inscriptions made by human agency, rock art, or any other archaeological, paleontological, or historical feature situated on public lands, except with the express permission of the public agency that has jurisdiction over the lands. Violation of this section is a misdemeanor.

PRC Section 5097.98 states that if Native American human remains are identified within a project area, the landowner must work with the Native American Most Likely Descendant as identified by the NAHC to develop a plan for the treatment or disposition of the human remains and any items associated with Native American burials with appropriate dignity. Section 15064.5 of the State CEQA Guidelines also addresses these procedures. California Health and Safety Code Section 7050.5 prohibits disinterring, disturbing, or removing human remains from a location other than a dedicated cemetery. Section 30244 of the PRC requires reasonable mitigation for impacts on paleontological and archaeological resources that occur because of development on public lands.

California Health and Safety Code: California Health and Safety Code Section 7050.5 regulates the treatment of human remains. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to his or her authority. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours.

***Native American Heritage Commission*:** The NAHC was created by statute in 1976, is a nine-member body appointed by the Governor to identify and catalog cultural resources (i.e., places of special religious or social significance to Native Americans and known graves and cemeteries of Native Americans on private lands) in California. The Commission is responsible for preserving and ensuring accessibility of sacred sites and burials, the disposition of Native American human remains and burial items, maintaining an inventory of Native American sacred sites located on public lands, and reviewing current administrative and statutory protections related to these sacred sites.

State Assembly Bill 52: Prior to the enactment of Assembly Bill 52, the State of California found current laws provided limited protection for sites, features, places, objects, and landscapes with cultural value to California Native American Tribes. These items and locations included the protection of Native American sacred places such as places of worship, religious or ceremonial sites, and sacred shrines. California Native Americans have used, and continue to use, natural settings in the conduct of religious observances, ceremonies, and cultural practices and beliefs. These resources reflect the Tribes' continuing cultural ties to the land and their traditional heritage. Many of these archaeological, historical, cultural, and sacred sites are not located in the current boundaries of California Native American reservations and rancherias and therefore are not covered by the protectionist policies of Tribal governments. To recognize California Native American Tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American Tribal governments, and respecting the interests and roles of project proponents, the Legislature enacted AB 52 Native Americans: California Environmental Quality Act.

AB 52 formally recognizes that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in Tribal cultural traditions, heritages, and identities. California Native American Tribes are experts regarding their Tribal history and practices for which they are traditionally and culturally affiliated. Due to this unique history, and to uphold existing rights of all California Native American Tribes to participate in, and contribute their knowledge to, environmental analysis, projects should include Tribal knowledge about the land and TCRs at issue. Projects should also consider a potential significant impact on those resources. Therefore, a meaningful consultation

between California Native American Tribal governments and lead agencies, respecting the interests and roles of all California Native American Tribes and project proponents, and the level of required confidentiality concerning TCRs shall occur. Doing so will allow identification of potential TCRs onsite and incorporation of culturally appropriate mitigation measures considered by the decision-making body of the lead agency. Doing so also enables California Native American Tribes to manage and accept conveyances of, and act as caretakers of, TCRs and ultimately establishes that a substantial adverse change to a TCR has a significant effect on the environment.

Local

***1982 Monterey County General Plan*:** The 1982 Monterey County General Plan includes policies related to the preservation of tribal cultural resources; please see **Section 4.4, Cultural Resources**.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the preservation of tribal cultural resources. Applicable goals from the Carmel Area LUP are summarized in **Section 4.4, Cultural Resources**.

City's General Plan: The City's General Plan includes goals and policies related to the preservation of cultural resources; please see **Section 4.4, Cultural Resources**.

Del Monte Forest Area LUP: The Del Monte Forest Area LUP includes policies related to the preservation of tribal cultural resources; please see **Section 4.4, Cultural Resources**.

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	■	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐

Impact Discussion

a.i. and a.ii, Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The Proposed Project is located in unincorporated Monterey County between the City and Del Monte Forest. According to the NWIC record search conducted by Albion, there is one (1) previously identified cultural resource within the Project area, the Stevenson Lower and Middle School, and 17 cultural resources within a 0.25-mile radius of the Project area (see **Section 4.4, Cultural Resources**). The Project site does not include any sites associated with TCRs that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). CAWD sent out tribal consultation letters pursuant to AB 52 based on their internal consultation list on October 1, 2025. In addition, CAWD conducted additional outreach via email on November 3, 2025. CAWD received a request to consult on the Proposed Project from the Costanoan Rumsen Carmel Tribe on February 11, 2026, and requested that they be involved in monitoring since the Project site is located in a sacred area. CAWD also received a request to consult on the Proposed Project from the Esselen Tribe of Monterey County on October 22, 2025. The representatives of the Esselen Tribe of Monterey County expressed their concerns related to potential inadvertent discovery of tribal resources, especially along Pescadero Canyon, during the Proposed Project.

The KaKoon Ta Ruk Band of Ohlone-Costanoan Indians of the Big Sur Rancheria expressed concerns about potential cultural resources on the Project site, but stated that they did not have the resources to send a monitor, requested a Treatment Protocol be included in Project mitigation measures, and requested updates regarding the Proposed Project. The Ohlone/Costanoan-Esselen Nation also requested consultation on February 11, 2026.

CAWD conducted initial consultation meetings with the Costanoan Rumsen Carmel Tribe, the Esselen Tribe of Monterey County, and the Ohlone/Costanoan-Esselen as stated above. The tribes indicated that they have significant history in the area and that the Project site was sensitive for TCRs. Locations of specific resources were not provided during consultation. CAWD would implement the following mitigation measures based on the results of tribal consultation.

> **Mitigation Measure TCR-1**: CAWD shall notify tribal representatives from the Esselen Tribe of Monterey County, the Ohlone Costanoan Esselen Nation, and the Costanoan Rumsen Carmel Tribe at least 30 days prior to the start of ground disturbing activities. In the event that one or multiple of the notified tribes choose to perform a Cultural Resources Sensitivity Training for construction personnel, this training would be provided prior to start of ground disturbing activities. Cultural resources sensitivity training shall be presented to all construction personnel. The training shall focus on how to identify Tribal Cultural Resources that may be encountered

during earthmoving activities, and the procedures to be followed in such an event. This training shall be provided for any new personnel joining the construction team.

Mitigation Measure TCR-2: CAWD shall notify Native American monitors associated with the Esselen Tribe of Monterey County, the Ohlone Costanoan Esselen Nation, and the Costanoan Rumsen Carmel Tribe at least 30 days prior to start of ground disturbing activities. In the event that one or multiple tribes choose to monitor project-related ground disturbance, tribal monitoring shall be distributed equitably, based on budgeted costs, among each of these tribal groups. A Native American monitoring rotation schedule shall be incorporated into the CRMDP (see **Mitigation Measure CUL-1**). The monitors shall have the authority to halt and redirect work should any Tribal Cultural Resources be identified during monitoring (See **Mitigation Measures CUL-3** and **TCR-3**). The tribal monitoring program shall follow protocols outlined in the CRMDP, which shall contain an allowance that the tribal monitor may reduce or discontinue monitoring as warranted, at the discretion of the tribal monitor, in consultation with CAWD.

Mitigation Measure TCR-3: In the event that potential TCRs are identified by the tribal monitor, ground-disturbing activities within a 100-foot radius of the discovery shall be halted or diverted (See **Mitigation Measure CUL-3** for a discussion of Cultural Resources Inadvertent Discoveries Protocols). Work shall be allowed to continue outside of the 100-foot buffer area. If the tribal monitor determines that any cultural resources exposed during construction constitute a Tribal Cultural Resource (TCR) under CEQA, he/she shall notify CAWD and other appropriate parties of the evaluation. Tribal monitors shall consult with the qualified Archaeologist to develop and implement a Cultural Resources Treatment Plan (CRTP), which shall consider the resources' tribal value, and would outline methods to be used to mitigate project impacts to TCRs (see **Mitigation Measure CUL-3**). The plan shall include avoidance of the resource, or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the Esselen Tribe of Monterey County, the Ohlone Costanoan Esselen Nation, and the Costanoan Rumsen Carmel Tribe. The plan shall include measures to ensure the find is treated in a manner that respectfully retains, to the degree feasible, the qualities that render the resource significant to the participating Native American groups. Examples of appropriate mitigation for TCRs include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery.

With implementation of the mitigation measures listed above, the Proposed Project would have a less-than-significant impact on Tribal Cultural Resources.

4.14 Utilities and Service Systems

Environmental Setting

Water Supply and Wastewater

California American Water (CalAm) provides water service to the Project area. The Project site is located primarily in unincorporated Monterey County, between Del Monte Forest and the City. The Carmel Area Wastewater District provides wastewater collection service to the Proposed Project area.

Solid Waste

Waste Management, Inc. provides solid waste and recycling collection services for the unincorporated portions of Monterey County. Solid waste generated during construction and demolition activities would be disposed of at the nearest regulated landfill, which is the Monterey Peninsula Landfill and Materials Recovery Facility located north of the City of Marina and operated by ReGen Monterey.

Regulatory Environment

State

***Assembly Bill 939*:** California AB 939 established the California Integrated Waste Management Board (CalRecycle), which required all California counties to prepare Integrated Waste Management Plans. Additionally, AB 939 required all municipalities to divert 50 percent of their waste stream by the year 2000.

Local

***1982 Monterey County General Plan*:** None of the policies provided in the 1982 County General Plan related to utilities and service systems are applicable to the Proposed Project.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to the regulation of utilities and service systems. The following policy from the Carmel Area LUP may apply to the Proposed Project:

3.3.3.1: The County should support the wastewater reclamation project proposed by the Carmel Sanitary District. The development of new facilities shall avoid damage of riparian habitat and conversion of prime agricultural land.

City's General Plan: The City's General Plan includes the following policy related to the regulation of utilities and service systems that could apply to the Proposed Project:

P5-188: Cooperate with regional and state agencies in the detection and elimination of illegal discharges of pollutants into Carmel Bay. Promote the proper disposal of pollutants to the sanitary sewer or hazardous waste facilities rather than the storm drainage system. Establish appropriate inspection criteria for new development and respond to complaints of illegal discharges. (LUP)

Del Monte Forest Area LUP: The Del Monte Forest Area LUP includes the following policy related to the regulation of utilities and service systems that could apply to the Proposed Project:

118: Development shall only be approved if it is first clearly demonstrated that the additional wastewater discharge associated with such development will not significantly adversely impact coastal resources, including primarily in terms of Carmel Bay.

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or	☐	☐	■	☐

Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	■
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	■
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	■	☐
e) Comply with federal, state, and local management and reduction statuses and regulations related to solid waste?	☐	☐	■	☐

Impact Discussion

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?

The Proposed Project would not expand the potable water system or increase potable water pipeline capacity to serve additional customers. The Proposed Project consists of the replacement, abandonment, and rehabilitation of the existing sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project would not induce an increase in population that would increase in demands for water service. Construction may temporarily increase water use at the Project sites for dust suppression; however, these impacts would be short-term. Pipe bursting activities would have the potential to damage existing water mains in close proximity to the project alignment due to their age (over 100 years old). To avoid impacts to these existing water mains, the location of water mains would be determined prior to construction by submitting a request to the Underground Service Alert. Where water mains are located within three feet of pipe bursting of the existing sewer main, the construction contractor would be required to excavate and expose the water main, which would allow the soils around the water main to shift without damaging the water main. Therefore, impacts related to water facilities as a result of Proposed Project construction would be less than significant.

Replacing and rehabilitating the damaged sewer mains at the Pescadero Road and Carmel Woods Project sites is necessary to continue to provide reliable service to the District's customers and minimize the potential for sewer spills in the future. The Pescadero Road Project component involves the replacement of a damaged section of sewer main located in and parallel to Pescadero Road on the

northwest side of the City to continue to provide reliable service to the District's customers and minimize the potential for future sewer spills. The existing sewer main on the forested hillside of Pescadero Canyon has been damaged by tree falls and is in poor condition. Localized high points and other condition issues have caused several sewer spills, and maintenance crews have had difficulty accessing the sewer main for maintenance. The Carmel Woods Project component involves the replacement and rehabilitation of existing gravity sewer mains and manholes. Damaged VCP mains would be replaced with new PVC or HDPE pipes in accordance with CAWD standards. The Proposed Project would replace all manholes determined to be in poor condition with new pre-cast concrete manholes or rehabilitate existing manholes with a lining system. The Proposed Project itself would not generate wastewater, and no new or expanded wastewater facilities would be required. Because the Proposed Project is a replacement and rehabilitation of an existing facility and would not generate new wastewater nor increase capacity, impacts to wastewater treatment and demand would be less than significant.

As discussed in **Section 4.9, Hydrology and Water Quality**, construction activities would not increase the amount of impervious surface along the project alignment because a majority of the Proposed Project involves replacement and rehabilitation activities that would be installed under existing impervious roadways. Additionally, the Proposed Project includes pipe bursting, a trenchless method of replacing buried pipelines, which reduces ground disturbance and the need for additional impervious surfaces. Therefore, the Proposed Project would not alter the drainage pattern of the Proposed Project sites and would not increase stormwater flow such that new or expanded stormwater drainage systems would be necessary. Therefore, this impact is less than significant.

As discussed in **Section 4.5, Energy**, operational energy demand would be similar to existing conditions. The Proposed Project would require energy for the installation of new pipelines, as well as any segments of existing utility lines to be removed (rather than abandoned in place), and the transport of material for construction and waste generated by construction activities. In addition, energy would be consumed due to vehicle trips to and from the Project site during construction. The Proposed Project would not generate a new demand for electricity or natural gas. Project operation would include routine inspections and maintenance. Maintenance needs are expected to be reduced in comparison to existing conditions due to the improved conditions of the system after the proposed project. No new electric or gas infrastructure would be required that would cause significant environmental effects due to the proximity of existing connections. The Proposed Project would not involve any components requiring telecommunications infrastructure and is not anticipated to involve the relocation of any existing telecommunications facilities. Therefore, the Proposed Project would have a less-than-significant impact with regard to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects.

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

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project would not include the construction of any new water utilities and therefore would not introduce new potable water connections from reasonably foreseeable future development. As a result, the Proposed Project would have no impact related to increasing demand on existing or proposed water systems and would not impact water supplies during normal, dry, and multiple dry years compared to existing conditions.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites, and would not introduce new wastewater connections that would increase demand on existing or proposed wastewater systems. Therefore, no impact would occur.

d. and e. Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Would the project comply with federal, state, and local management and reduction statuses and regulations related to solid waste?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. The Proposed Project would generate solid waste as a byproduct of the installation of new utility lines. Waste generated by the Proposed Project during construction would be disposed of at local waste processing facilities. Solid waste generated during construction would be minimal and would be disposed of in compliance all applicable federal, State, and local regulations related to solid waste reduction. The Proposed Project would not generate solid waste once operational. This would be a less-than-significant impact.

4.15 Wildfire

Environmental Setting

The State Fire Marshal is mandated to classify lands within SRAs into Fire Hazard Severity Zones (FHSZs). FHSZs are defined by the California Department of Forestry and Fire Protection (CALFIRE) and are designated as “Very High,” “High,” or “Moderate,” based on the presence of fire-prone vegetation, climate, topography, assets at risk (e.g., high population centers), and a fire protection agency’s ability to provide service to the area (CALFIRE, 2025). Areas outside of designated SRAs, including the Proposed Project sites, are considered LRAs, where fire response is the primary responsibility of local fire agencies.

The County of Monterey is characterized by moderate to very high fire hazards. California Building Code Chapter 7a includes provisions for the construction of new buildings within very high fire hazard severity zones (VHFHSZ) to improve the ignition resistance of buildings. CALFIRE identifies the land within the jurisdiction of the City as an LRA. The Proposed Project sites also border an SRA, which encompasses Del Monte Forest (CALFIRE, 2024). Fire protection for the Proposed Project site falls under the jurisdiction of the Cypress Fire Protection District. The Proposed Project site is located in a high fire hazard severity zone (Monterey County, 2026).

Regulatory Environment

State

Public Resources Code Section 4201 – 4204: Sections 4201 through 4204 of the California Public Resources Code direct the CALFIRE to map Fire Hazard Safety Zones (FHSZs) within SRAs, based on

relevant factors such as fuel, terrain, and weather. Mitigation strategies and building code requirements to reduce wildland fire risks to buildings within SRAs are based on these zone designations.

Government Code Section 51175-51189: Sections 51175 through 51189 of the California Government Code directs CalFire to recommend FHSZs within LRAs. Local agencies are required to designate Very High Fire Hazard Safety Zones (VHFHSZs) in their jurisdiction within 120 days of receiving recommendations from CALFIRE and may include additional areas not identified by CalFire as VHFHSZs.

Local

***1982 Monterey County General Plan Policies*:** The 1982 Monterey County General Plan includes the following objective related to wildfire that could apply to the Proposed Project (see also **Section 4.8**. **Hazards and Hazardous Materials**):

Objective 17.4: Reduce fire hazard risks to an acceptable level by regulating the type, density, location, and/or design and construction of development.

***Carmel Area LUP*:** The Carmel Area LUP includes goals and policies related to wildfire. The following goals from the Carmel Area LUP may apply to the Proposed Project:

2.7.4.6: The County shall require all new development to have adequate water available for fire suppression. The Fire Districts and the Planning and Building Inspection Department shall determine the adequacy and location of individual water storage to be provided.

City's General Plan: The City's General Plan includes goals and policies related to wildfire. The following policies from the City's General Plan may apply to the Proposed Project:

O8-4: Prevent or reduce the potential for life loss, injury, and property damage from fire hazards.

P8-18: Ensure adequate water supply for fire emergencies.

P8-19: Encourage new development located in or adjacent to fire hazard areas to incorporate fire preventative site design, access, landscaping and building materials, and other fire suppression techniques.

Del Monte Forest Area LUP: The Del Monte Forest Area LUP includes goals and policies related to hazards and hazardous materials. The following policy from the Del Monte Forest Area LUP may apply to the Proposed Project (see also **Section 4.8**. **Hazards and Hazardous Materials**):

38: New development shall be sited and designed to minimize risk from geologic, flood, or fire hazards; to assure stability and structural integrity; and to not threaten the stability of a site, contribute significantly to erosion, geologic instability, or destruction of the site or surrounding areas. Areas that are subject to the highest category of fire hazard in the California Department of Forestry and Fire Protection Fire Hazard Rating System shall be considered unsuitable for development, unless it can be clearly demonstrated that design measures can adequately mitigate the fire hazard. Mitigation of hazards shall be demonstrated by detailed technical reports specific to the hazard type in question (e.g., soils, geologic, geotechnical, erosion control, fire hazard, etc.) that are prepared by persons who are appropriately qualified in the hazard field in question (e.g., civil engineers and engineering geologists familiar with coastal processes, geotechnical engineers, etc.) and that are submitted as part of any permit application. All technical

reports shall be prepared consistent with County criteria for such reports (e.g., criteria for detail on seismic hazards are contained in the General Plan Safety Element; criteria for detail on fire hazards are based on the fire hazard rating system of the California Department of Forestry and Fire Protection; criteria for detail on shoreline hazards are based on Coastal Commission guidelines). All technical reports and analyses shall accompany development applications and/or be part of any required environmental documentation (e.g., that associated with CEQA).

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	■	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	■	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	■	☐

Impact Discussion

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Both Proposed Project sites are located in an LRA with a very high fire hazard and near an SRA with a very high fire hazard. The Proposed Project sites are located in a high fire hazard severity zone (Monterey County, 2026). The Proposed Project sites are primarily located within previously developed roadways, and all components would be located underground after construction is completed.

During construction for the Pescadero Road Project component, portions of Pescadero Road, Lincoln Street, and Monte Verde Street in the vicinity of the work would be closed to all vehicle and pedestrian through traffic during working hours. However, as discussed in **Section 4.12, Transportation**, a TCP would be developed to maintain access for local traffic in accordance with County requirements for encroachment permits. Traffic would be routed around the work area through 1st Avenue, Dolores Street, and Castro Lane. Detours and road closures in the Carmel Woods Project site would be temporary and would vary as construction occurs due to the linear nature of the Project. Although various impacts to vehicle and pedestrian access would occur, including lane closures and complete road closures, detour plans would be developed as part of the TCP to maintain access for local traffic. This would reduce potential interference with emergency response vehicles or wildfire-related emergency area evacuations resulting from proposed road or lane closures. In addition, lane or road closures from

the Proposed Project would be short-term overall and would not be located in a single place for long periods of time due to the linear nature of the Proposed Project. Although various impacts to vehicle and pedestrian access would occur, including lane closures and complete road closures, detour plans would be developed to maintain access for traffic. Therefore, impacts with regard to the impairment of an adopted emergency response plan or emergency evacuation plan would be less-than-significant.

b. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. Although construction of the Proposed Project could result in sparks or other sources of ignition, constituting a temporary construction-related fire hazard, construction would comply with all applicable fire safety provisions thereby reducing fire risk to the maximum extent practicable. Additionally, although the Proposed Project borders the Del Monte Forest Area, all construction work requiring the use of mechanical equipment would be limited to the outlined residential roadways and would not exacerbate fire risk in the forest. All construction work requiring mechanized equipment would take place in paved areas devoid of vegetation, and the risk for wildfire as a result of Project construction would be low. Furthermore, once operational, all components of the Proposed Project would be located underground and would not increase the risk of wildfire. As a result, the Proposed Project would have a less-than-significant impact related to exacerbating fire risk due to slope, prevailing winds, and other factors.

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The Proposed Project would not require the installation or maintenance of associated infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities that could exacerbate fire risk or cause additional environmental impacts. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. Although construction of the Proposed Project could result in sparks or other sources of ignition, constituting a temporary construction-related fire hazard, construction would comply with all applicable fire safety provisions thereby reducing fire risk to the maximum extent practicable. Additionally, although the Proposed Project borders the Del Monte Forest Area, all construction work would be limited to the outlined residential roadways and would not exacerbate fire risk in the forest. Once operational, the Proposed Project would be located underground and would not exacerbate fire risk. Therefore, impacts associated with exacerbated fire risk due to installation or maintenance of associated infrastructure would be less-than-significant.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. All construction work would be limited to the outlined residential roadways and therefore would not expose people or structures to

significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less-than-significant.

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

Impact Discussion

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

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. As described below, the Proposed Project would not 1) degrade the quality of environment, 2) substantially reduce the habitat of a fish or wildlife species, 3) cause a fish or wildlife population to drop below self-sustaining levels, 4) threaten or eliminate a plant or animal community, 5) reduce the number or restrict the range of a rare or endangered plant or animal, or 6) eliminate important examples of major periods of California history or prehistory.

The Proposed Project would result in temporary, construction-related impacts to biological resources, undiscovered cultural or TCRs, and undiscovered human remains interred outside of a formal cemetery. These impacts would be mitigated to less-than-significant through the implementation of the mitigation measures identified in this IS/MND. No operational impacts associated with the Proposed Project have

been identified as a result of the Proposed Project. No additional mitigation is necessary beyond the mitigation identified in each of the respective topical CEQA sections contained in this IS/MND.

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.)

The Proposed Project would not result in a cumulatively considerable adverse environmental effect. This IS/MND contains mitigation to reduce all potentially significant impacts to a less-than-significant level. CEQA allows a lead agency to determine that a project's contribution to a potential cumulative impact is not considerable and, thus, not significant when mitigation measures identified in the Initial Study would render those potential impacts less than considerable (CEQA Guidelines 15064(h)(2)).

The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. Where potentially significant effects are identified, mitigation measures are presented in this IS/MND to reduce these impacts to a less-than-significant level. The Proposed Project is contained entirely to the Pescadero Road Project site and the Carmel Woods Project site. No other projects are proposed at the Pescadero Road Project site or the Carmel Woods Project site that could result in a cumulatively considerable impact. No operational changes would result in increased sewer treatment capacity that could indirectly result in cumulative impacts.

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

The Proposed Project would not have a substantial adverse effect on human beings, either directly or indirectly. The Proposed Project consists of the replacement, abandonment, and rehabilitation of sewer main utility lines at the Pescadero Road and Carmel Woods Project sites. This IS/MND contains mitigation measures to reduce all potentially significant direct and indirect impacts to human beings to a less-than-significant level.

Chapter 5. List of Preparers and References

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Appendix A
Draft 60 Percent Project Design Plans

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Appendix B
Air Quality Modeling Results

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Appendix C
Sewer Odor Evaluation

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Appendix D
Biological Resources Report

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Appendix E
Geotechnical Investigation

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