COUNTY OF MONTEREY
HOUSING & COMMUNITY DEVELOPMENT
1441 SCHILLING PL SOUTH 2nd FLOOR, SALINAS, CA 93901
PHONE: (831) 755-5025/FAX: (831) 757-9516

INITIAL STUDY

BACKGROUND INFORMATION

Project Title:	Big Sur CG Owner LLC
File No.:	PLN220106
Project Location:	47000 Highway 1, Big Sur
Name of Property Owner:	Big Sur CG Owner LLC
Name of Applicant:	Big Sur CG Owner LLC
Assessor's Parcel Number(s):	419-201-023-000
Acreage of Property:	12.51 acres
General Plan Designation:	Rural Community Center and Watershed & Scenic Conservation
Zoning District:	Visitor Serving Commercial – Design Control District – Coastal Zone or "VSC-D(CZ)"
Lead Agency:	Monterey County Housing and Community Development
Prepared By:	Denise Duffy and Associates, Inc.
Date Prepared:	October 2023
Contact Person:	Fionna Jensen, Senior Planner, Monterey County Housing and Community Development
Phone Number:	831-769-6407

II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. Background

The Big Sur Campground and Cabins property was originally established in 1955 by Don McQueen and was licensed as a mobile home and recreational vehicle park under the California Department of Housing and Community Development (Park ID No. 270075-MP). Today, the property consists of 106 recreational vehicle or mobile home sites – including four existing mobile homes, 17 park model RVs, and three A-frame cabins, and an onsite wastewater treatment system (i.e., septic system). The property is improved with common areas for food and beverage, retail, recreation, and guest services. On November 2, 2022, the Applicant submitted a General Development Plan ("GDP") pursuant to Section 20.22.030 of the County of Monterey's Coastal Zoning Ordinance (Title 21) to guide future development of the property, on-going restoration measures, and address aging infrastructure. The GDP identifies allowable uses, operational standards, design requirements, and regulatory compliance for the existing and future development of the property. The property owner is proposing a project to modernize facilities, consistent with the GDP. The modernization of the existing campground would address aging infrastructure to ensure consistency with current design and development standards.

B. Description of Project:

The Big Sur Campground Project, herein referred to as the "Proposed Project" or "Project," consists of campground improvements at the existing Big Sur Campground, located at 47000 Highway, Big Sur, California 93920, Accessor Parcel Number ("APN") 419-201-023-000, see **Figure 1a** and **Figure 1b**. The Proposed Project consists of the demolition of existing campground common spaces (e.g., food and beverage, retail, recreation, and guest services), and the construction of new and renovated facilities. More specifically, the Proposed Project consists of the demolition of approximately 14,824 square feet of existing campground common spaces, detailed in **Table 1**.

Table 1 – Existing Buildings to be Demolished

Structure #	Description	Square Footage
E1	Retail – Firewood	69
E2	Retail – Ice	53
E3	Retail/Deck – Food and Beverage	231
E4	Retail	950
E5	Gatehouse and Market	313
E6	Dump Station	420
E6.1	Dump Station	50
E7	Retail – Firewood	110
E8	Storage	340
E9	Storage	160
E10	Bathroom/Laundry	1230
E11	Sports/Recreational Space	2500
E12	Lodge	1557

Table 1 – Existing Buildings to be Demolished

Structure #	Description	Square Footage
E12.1	Lodge Deck	810
E13	Workshop	551
E14	Lodge – Back of House	163
E15	Lodge – Back of House	244
E16	Shed	49
E18	Playground	4600
E19	Storage	150
E20	Storage	108
E21	Storage	53
E22	Storage	113
TOTAL:		**14,824**

Demolition of existing common spaces would allow for the construction of new campground common spaces which would include a new gate house, check-in office, café and bathhouse, workshop/game room, bathroom, and outfitter. The proposed development would consolidate common spaces (23 to 6) and result in a 4,398 square foot reduction in total site coverage. The proposed Café would replace the existing Market, which currently has limited sales of snacks, prepared foods, produce, eggs, milk. The proposed Café would expand current food and beverage services into a camp market/deli with a commercial kitchen that would only serve onsite guests and would not be open to the general public. The proposed Café would also include the sale of beer and wine, subject to the granting of license from the California Department of Alcoholic Beverage Control. On-site sale of beer and wine would also not be open to the general public. The size of each new building is detailed in **Table 2**.

Table 2 – Proposed Buildings

Structure #	Description	Square Footage
P1	Gate House	70
P2	Outfitter	1020
P3	Check-in Office	2131
P4	Café and Bathhouse	4987
P5	Workshop/Game Room	1578
P6	Bathroom	703
TOTAL		**10,489**

Improvements to the existing Project site are illustrated in **Figure 2.** The Proposed Project would not increase the capacity of the property; the existing number of visitor accommodations would remain the same (82 RV campground sites, 17 park model RVs, 4 mobile homes, and 3 A-frame cabins). However, in addition to the new common spaces identified above, the Proposed Project would also relocate/rearrange existing RV campsites, 17 existing park model RVs, and 4 mobile homes to 1) and create space for the site improvements (i.e., the new wastewater system); and 2) update infrastructure to meet current local, state, and federal requirements (e.g., setbacks from riverbanks). Additional improvements include replacing the existing park model RVs and mobile homes, which are beyond their usable life, with new units that conform the latest codes adopted by the California Department of Housing and Community, including Title 25 and American

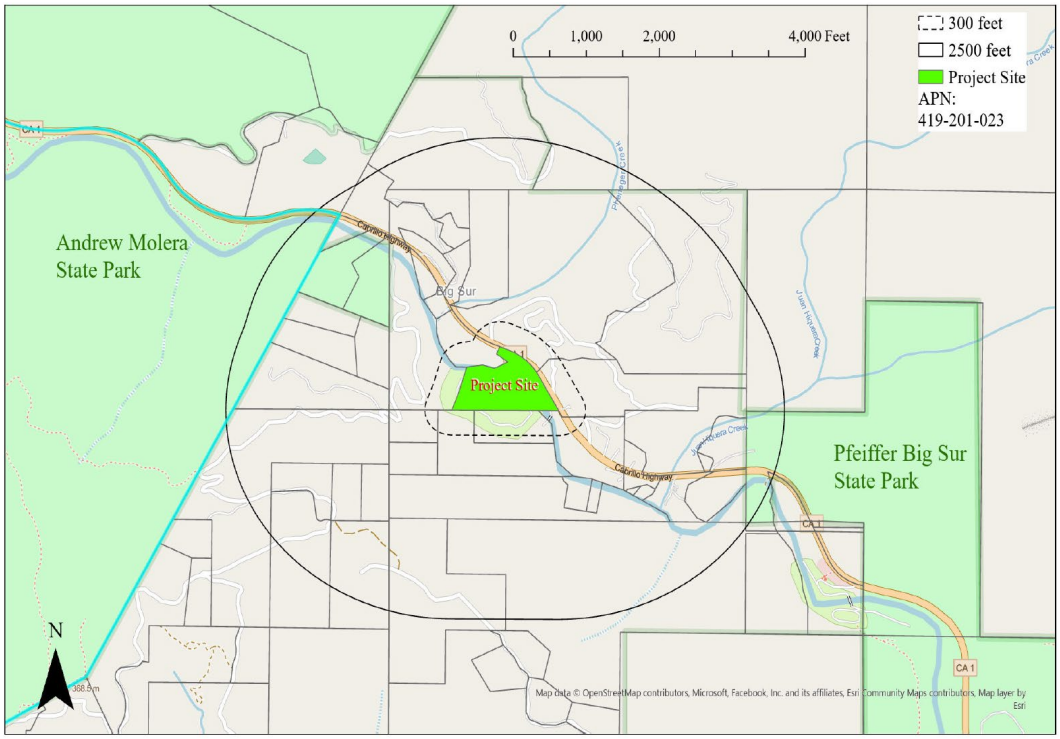
National Standards Institute (ANSI) 1195, and the Wildland Urban Interface standards. Improvements onsite would also include parking, internal site access, landscape and restoration, and utilities (e.g., wastewater treatment, propane, and electricity), detailed below.

Onsite Parking and Site Access

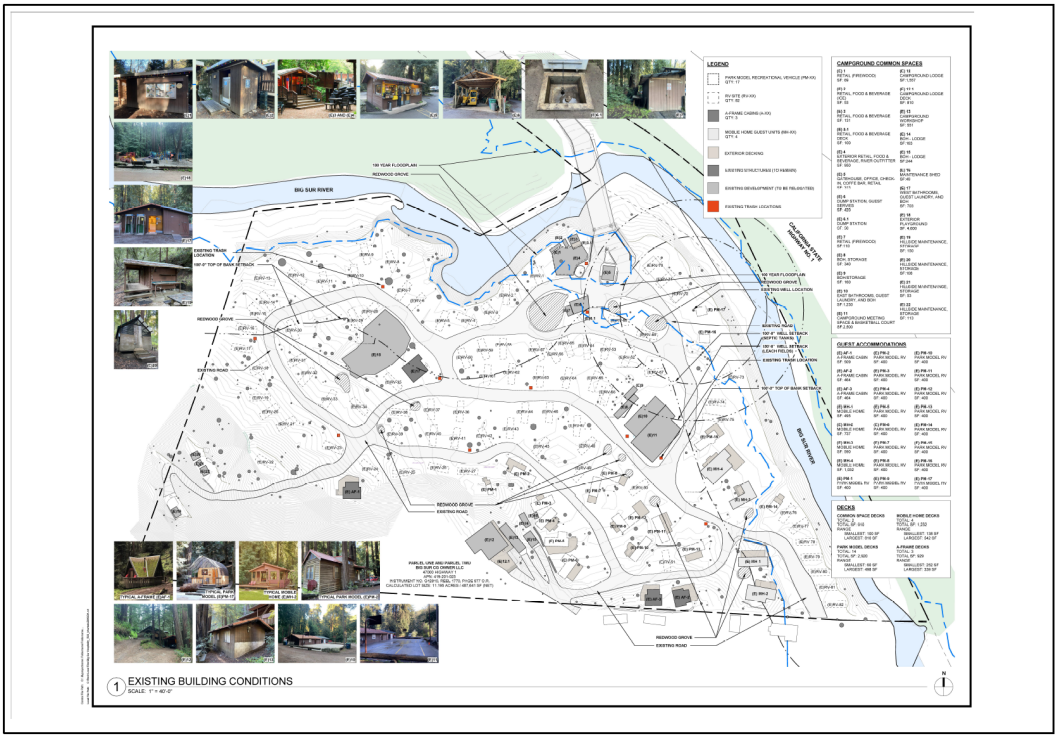
The Proposed Project site is accessible from a single driveway located directly off Highway 1. The driveway connects to an internal circulation system that consists of a paved single lane road. Parking is currently provided for each campground common use facility (e.g., RV/Campground spaces). Parking would be improved to include 78 dedicated parking spaces along the southern portion of the internal circulation route (see **Figure 3**). The Proposed Project also includes internal access improvements that include permeable foot paths and boardwalks (see **Figure 4**).



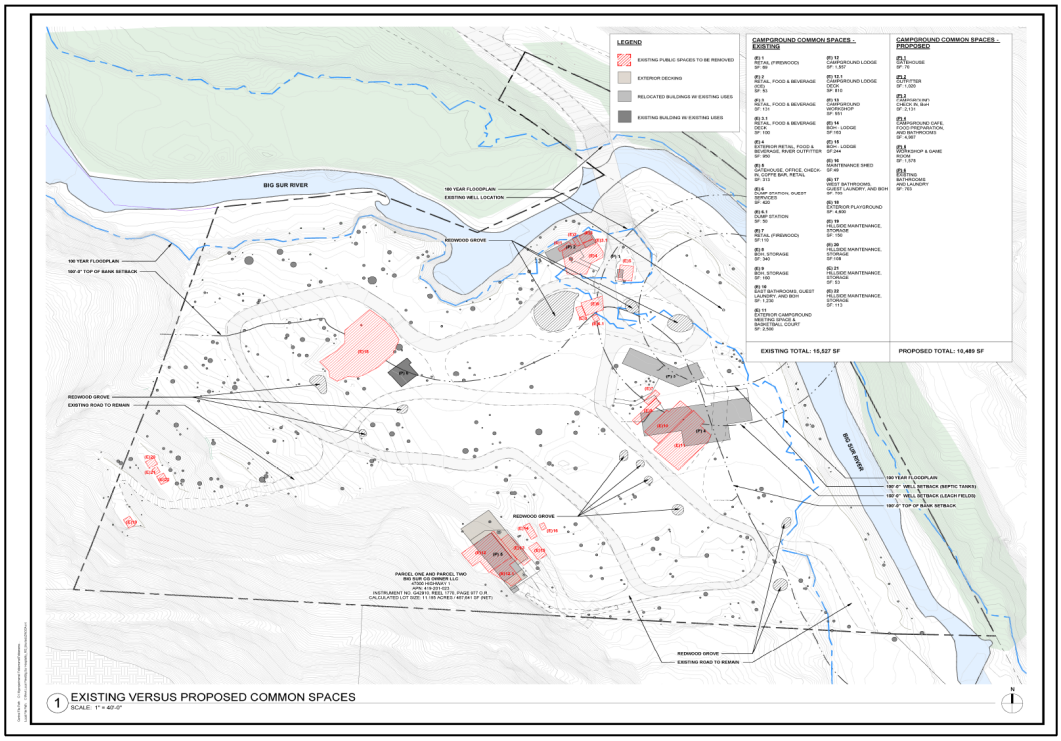
Regional Map — Figure 1a



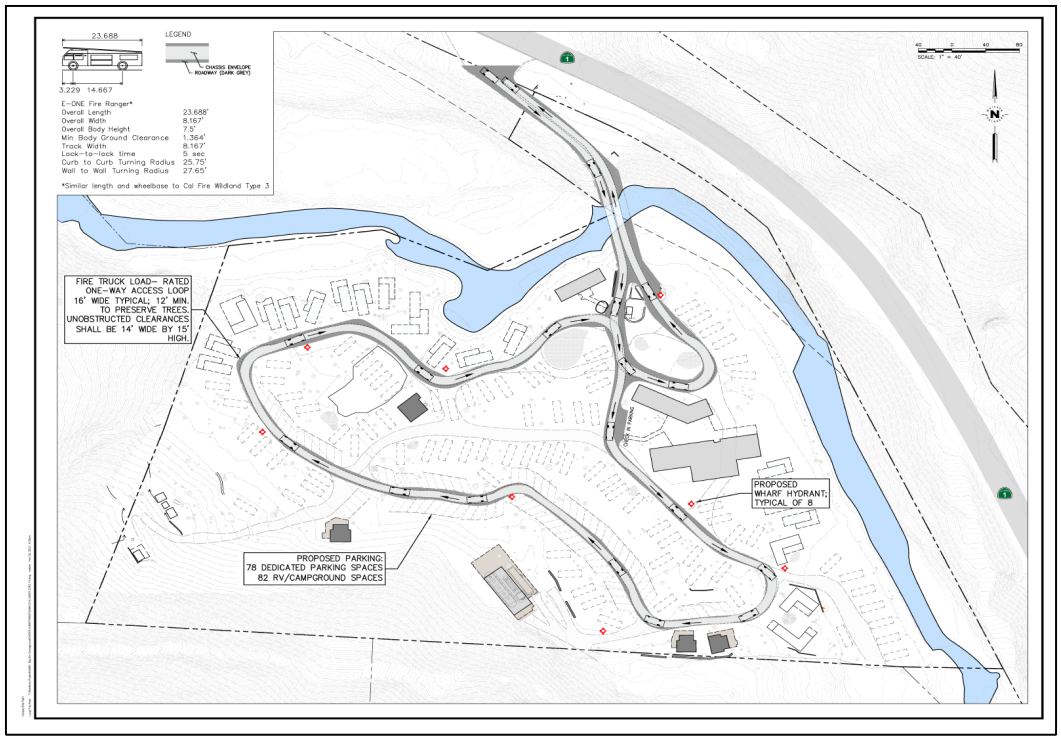
Vicinity Map	Figure 1b



Existing Building Conditions	Figure 1c



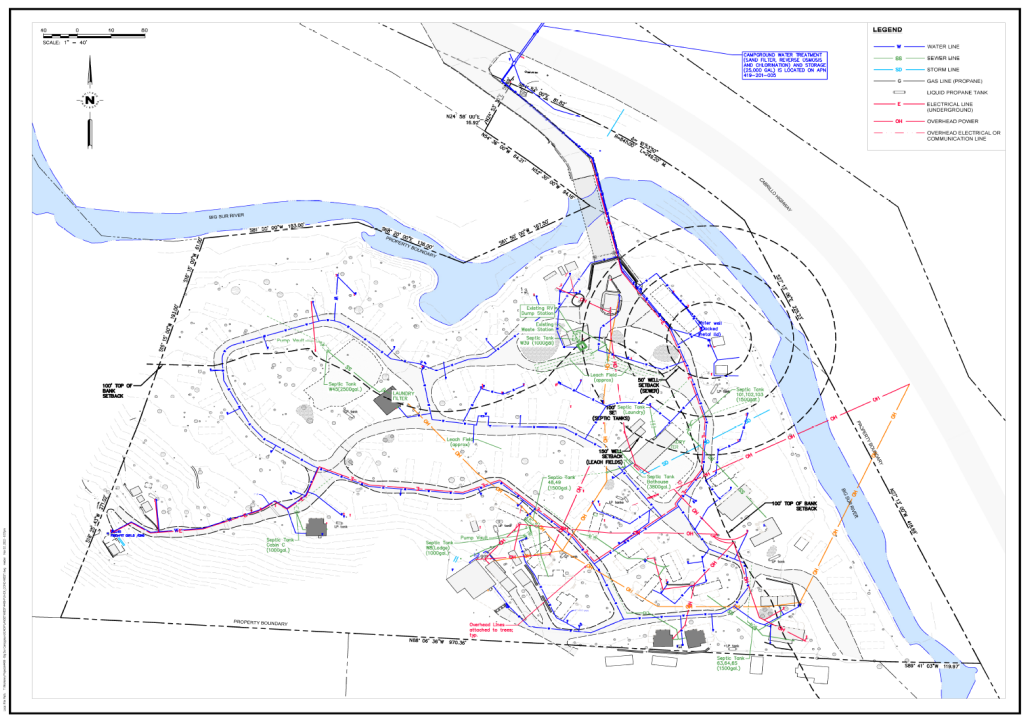
Existing Versus Proposed Common Spaces	Figure 2



Proposed Fire Vehicle Circulation and Parking Plan	Figure 3



Site Restoration and Landscape Plan	Figure 4



Existing Utilities	Figure 5

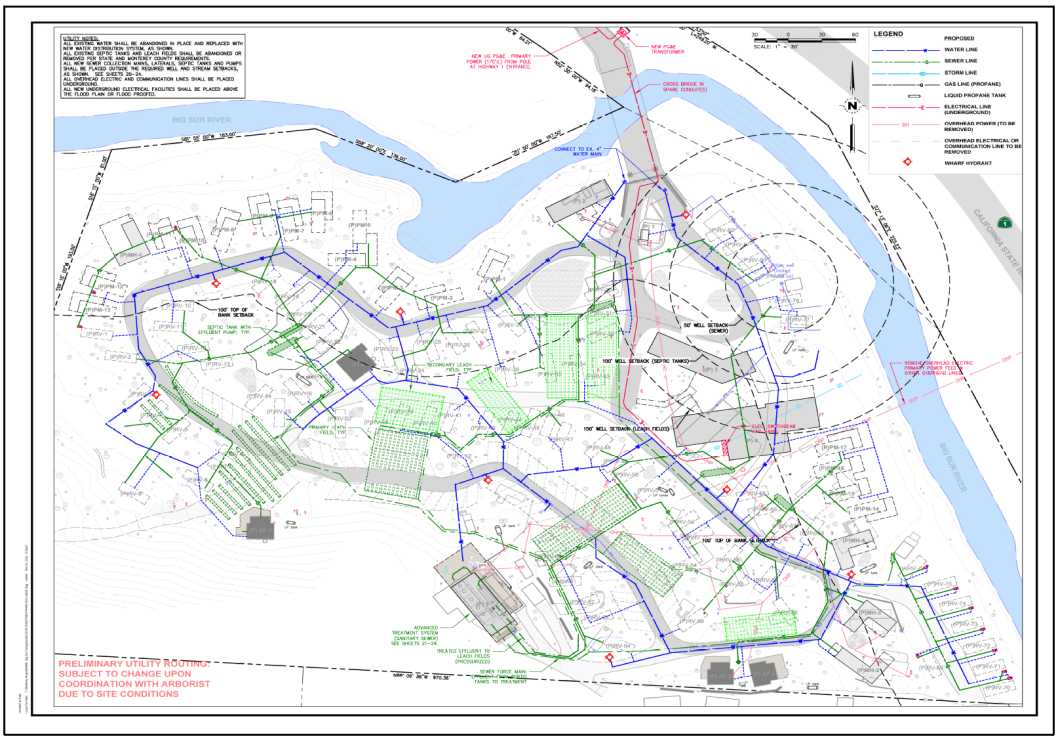
W*astewater Treatment*
The Proposed Project site's existing wastewater system currently consists of 11 septic tanks (totaling 16,300 gallons), leach fields, and a dump station, see **Figure 5**. The existing wastewater system was constructed in the 1950's and therefore does not meet contemporary standards for nitrogen reduction, groundwater separation, or setbacks from the Big Sur River or onsite wells (100 feet and 150 feet, respectively). The Proposed Project includes the demolition of the existing wastewater system, and the construction of a new wastewater system that includes new primary and secondary leach fields, six (6) septic tanks with effluent pumps, installation of new sewage lines, and construction of a new wastewater system that utilizes membrane bioreactor ("MBR") technology. The design and location of the new wastewater system would meet contemporary standards established by both local, regional, and state regulations. Installation of the wastewater treatment system in Building P(5) would impact approximately 426 square feet of development on slopes in excess of 30% and therefore a Coastal Development Permit is required to allow such development.

Restoration and Landscaping
The Proposed Project is located within a Redwood Forest and abuts riparian habitat associated with the Big Sur River. The existing Project site has been landscaped with invasive species and ornamentals (e.g., lawns). Furthermore, native understory and riparian habitat have been disturbed and degraded through years of site development and visitor use. The Proposed Project would include restoration of the redwood and riparian habitats through removal of invasive species and the intentional landscaping with native understory plant species and protection of existing understory habitat where development is not planned, see **Figure 6**. More specifically, the Proposed Project would restore 33,540 square feet of riparian habitat along the Big Sur River, and 40,407 square feet of Redwood Forest habitat throughout the Project site. Additionally, the Proposed Project would establish 76,661 square feet of native species preservation areas, and landscaping 59,357 square feet with native species.

Utilities – Electricity and Propane
Pacific Gas & Electric ("PG&E") provides electrical services to the Project site. Powerlines are located throughout the site and attached either to powerline poles or redwood trees. Improvements are required to ensure adequate safety and compliance with contemporary building requirements (i.e., fire safety, energy efficiency, water conservation). Improvements would include removing all overhead power and communication lines and installing new lines underground. The site is also serviced by propane. Nine (9) propane tanks are located throughout the Project site. The Proposed Project would remove all tanks except for those that would support a new emergency generator. Additionally, all existing water supply pipelines would be replaced with new water lines. Improvements to utilities is illustrated in **Figure 7**.



Site Restoration and Landscape Plant List	Figure 6



Site Utility Plan	Figure 7

Construction

Construction of the Proposed Project would generally involve tractors, backhoes, compactors, excavators, rollers, dump trucks, etc. Most of the equipment would be brought to the site at the beginning of work and remain until the completion of construction. As necessary, trucks would bring materials to the site. Deliveries would likely take place over a short period of time (e.g., less than a month). The estimated number of construction workers on site at any one time would be approximately 10 – 100 workers. The start of construction depends on the Project approval date, seasonal factors, and the contractor's schedule. However, once approved, construction is expected to last approximately one (1) year. Construction activities would be limited to the hours between 7AM – 7PM, Monday through Saturday. No construction activities would occur on Sundays or holidays. Local site access would be provided by existing ingress/egress off Highway 1.

Grading

The Proposed Project would disturb approximately 5.2 acres and would require approximately 5,135 cubic yards of grading, essentially all cut. Approximately 3,800 cubic yards of cut associated with the installation of utilities would be returned to the utility trenches after installation. The remaining 1,335 cubic yards of cut would be hauled off-site.

Pervious and Impervious Coverage

The Project site currently has 28,753 square feet of impervious coverage. The Proposed Project would result in 25,507 square feet of impervious coverage, a reduction of approximately 3,246 square feet. Specifically, the Proposed Project would reduce the coverage associated with RV/mobile home/A-frame sites and areas that are paved or covered.

C. Surrounding Land Uses and Environmental Setting:

The Proposed Project is located at 4700 Highway 1, Big Sur, California, 93920, on APN 419-201-023-000 and covers approximately 12.51 acres. The site is designated as a "Rural Community Center" and "Watershed and Scenic Conservation" in the 1982 County of Monterey General Plan ("General Plan") and zoned as "Visitor Service Commercial" with a Design District Overlay, Coastal Zone or "VSC-D(CZ)". The Proposed Project is subject to requirements contained in the Monterey County Local Coastal Program, including the Big Sur Coast Land Use Plan ("LUP") and Big Sur Coastal Implementation Plan ("CIP") as well as the Coastal Zoning Ordinance (Title 20). The Project site is surrounded by parcels designated as "Rural community Center" and "Watershed & Scenic Conservation" and zoned as "Visitor Serving Commercial."

D. Other public agencies whose approval is required:

This IS/MND is an informational document for both agency decision-makers and the public. The County is the lead agency responsible for adoption of the IS/MND and approving land use permits related to the Proposed Project. Below is a list of approvals required by Monterey County. Project entitlements would include, but not be limited to:

- Combined Development Permit consisting of: 1) Coastal Development Permit and Design Approval to allow campground improvements including a replacement septic system and relocation of camp sites, demolition of approximately 14,824 square feet of existing campground common spaces and construction of a 10,489 square feet of campground structures including a 70 square foot gatehouse, 1,020 square foot campground general store, 2,131 square foot registration and office, 4,987 square foot campground café, 1,578 square foot recreational room, and a 705 square foot guest services building; 2) a Coastal Development Permit to allow development within 100 feet of Environmentally Sensitive Habitat Areas; 3) Coastal Development Permit to allow development on slopes exceeding 30 percent; and 4) Coastal Administrative Permit to allow development within 750 feet of a known archaeological resource.

Upon receipt of local approval (above permit requirements) and a signed State HCD Mobilehome Or Recreational Vehicle Park Government Agency Approval Form, State of California Housing and Community Development Permit would hold all site disturbance and construction permitting authority. Grading and Building Permits, and other permits including electrical, would be required from State of California Housing and Community Development Permit.

Other agencies that could have permit or review authority over some aspect of the Proposed Project may include Monterey Bay Air Resources District ("MBARD"), Central Coast Regional Water Quality Control Board (CCRWQCB"), and the California Department of Fish & Wildlife ("CDFW").

III. PROJECT CONSISTENCY WITH OTHER APPLICABLE LOCAL AND STATE PLANS AND MANDATED LAWS

Use the list below to indicate plans applicable to the project and verify their consistency or non-consistency with project implementation.

General Plan	☒	Air Quality Mgmt. Plan	☒
Specific Plan	☐	Airport Land Use Plans	☐
Water Quality Control Plan	☒	Local Coastal Program-LUP	☒

General Plan/Local Coastal Program LUP: Within the coastal areas of unincorporated Monterey County, the 1982 General Plan policies apply where the Local Coastal Program ("LCP") is silent. This is typically limited to noise policies as the LCP policies contain most development standards applicable to development in the coastal areas. The Big Sur Coast Land Use Plan ("LUP") does not include specific policies related to noise but encourages land use to preserve the peace and tranquility of the existing neighbors. As discussed in **VI. 11. Noise**, the Proposed Project would not likely result in a significant permanent increase in ambient noise. The Proposed Project consists of the demolition of existing campground common spaces, the construction of new campground common spaces and improvements to the onsite utilities. As a result, the underlying use of the Project site would not change, and operational noise associated with the continued use of the Project site is not anticipated to increase beyond existing levels. The Proposed Project would not increase the capacity of the property, the existing number of visitor accommodations would remain the same (82 RV campground sites, 17 park model RVs, 4 mobile homes, and 3 A-frame cabins). Construction would result in temporary noise impacts but would be minimized with implementation of standard construction Best Management Practices ("BMPs").

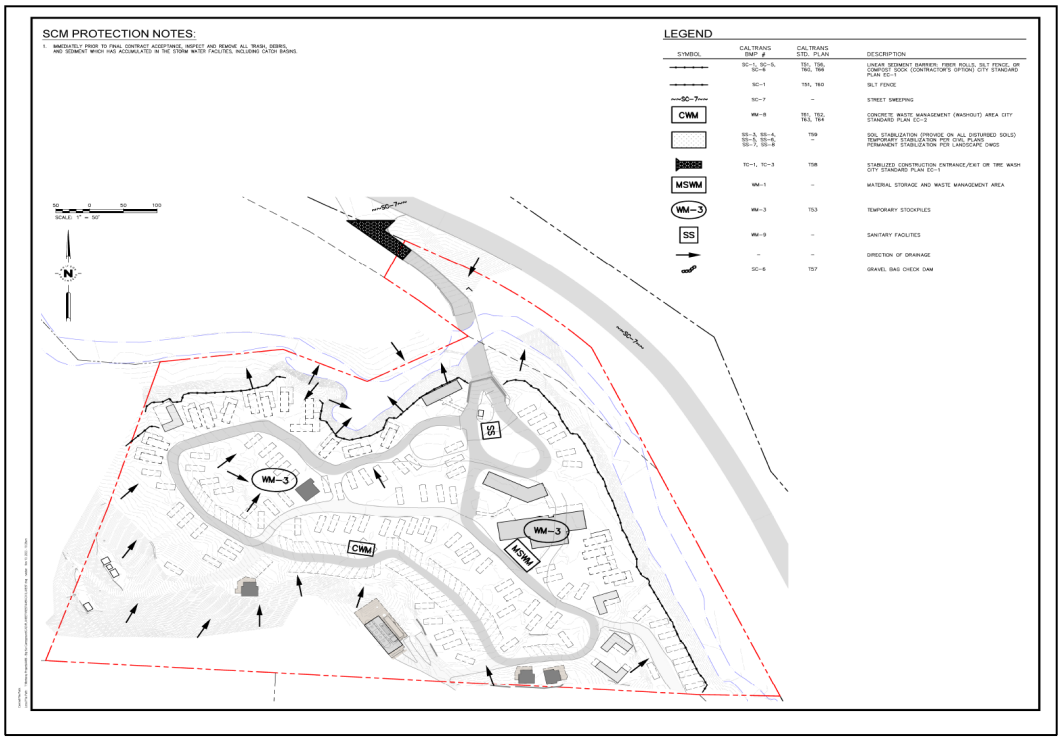
The Project is subject to the Big Sur Coast LUP and associated CIP and the development standards contained in Title 20 of the County's Coastal Zoning Ordinance. As proposed, conditioned, and mitigated, the Project is consistent with the LUP and CIP. The Big Sur Coast LUP establishes polices that preserve, conserve, and enhance the natural resources within the Big Sur Coast LUP area. These policies and regulations address issues pertaining to visually sensitive areas, Big Sur Critical Viewsheds, public and private viewsheds, and environmentally sensitive habitats. As discussed in **Section VI.10 Land Use and Planning,** the Project would not conflict with the Big Sur Coast LUP or CIP. Although the Project site is located adjacent to Highway 1 and is heavily screened by existing dense vegetation, limited portions of the existing development are visible from the Critical Viewshed (defined as everything within sight of Highway 1 and major public viewing areas). The Proposed Project would not result in placement of structures which would be more visible from the Critical Viewshed. The Project would not obstruct private or public viewsheds and is consistent with the surrounding rural characteristics of the surrounding area. The Proposed Project is located in a Redwood Forest, and adjacent to riparian habitat associated with the Big Sur River. Both Redwood Forest and riparian habitats are considered environmentally sensitive habitat area ("ESHA") by the Big Sur Coast LUP. While located in an ESHA, the Proposed Project site is previously disturbed and developed, and would consists of improvements

to align development with the standards and policies established by the governing LUP. These improvements would ensure impacts to ESHA are minimized. More specifically, the Proposed Project would replace the existing wastewater system with a modernized facility that would improve groundwater quality and reduce the risk of contaminating surface water in the event of a system failure. Moreover, the Project would move the wastewater system away from the Big Sur River, to align with the design standards of the Big Sur Coast LUP and Monterey County Code Chapter 15.20. Lastly, improvements associated with the Proposed Project would include landscape and restoration of the Redwood Forest and riparian habitat, through development and implementation of extensive restoration. The following IS/MND evaluates consistency with the General Plan and Big Sur Coast LUP for the protection of environmental resources and based on the analysis herein, the Proposed Project would be consistent with these plans. **CONSISTENT**

Water Quality Control Plan: The subject property lies within Region 3 of the Central Coast Regional Water Quality Control Board ("CCRWQCB") which regulates water quality related issues resulting in actual or potential impairment or degradation of beneficial uses, or the overall degradation of water quality. The Project could result in temporary construction-related effects (e.g., erosion). These effects would not likely be significant for several reasons. First, the Project requires minor ground disturbing activities, therefore ground disturbing impacts would likely be minimal and temporary. Second, construction would implement erosion control measures identified in the erosion management plan (see **Figure 8**). Similarly, construction would be required to comply with Chapters 16.08 and 16.12 of the Monterey County Code ("MCC") which address erosion and grading. Additionally, the Proposed Project would be required to comply with a standard Condition of Approval which requires submittal of a stormwater control plan to HCD-Environmental Services prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form. Operation of the Project would not generate pollutant runoff in amounts that would cause degradation of water quality. Rather, the Proposed Project would have a net benefit to water quality as the quantity of impervious surfaces would be reduced from existing levels. Additionally, improvements, particularly those related to construction of a new wastewater system would address potential water quality concerns associated with the existing wastewater system and therefore improve water quality issues. Furthermore, the Project would be required to comply with the County's non-standard Conditions of Approval EHSP04 – Cumulative Impact Analysis, EHSP01 – Wastewater Discharge Requirement, and EHSP02 – Effluent Monitoring which would specifically evaluate the efficacy of the new wastewater system. For additional discussion on hydrology and water quality, please refer to **Section VI.9 Hydrology and Water Quality** of this Initial Study. **CONSISTENT**

Air Quality Management Plan: The Project is located within the North Central Coast Air Basin ("NCCAB"), which includes unincorporated areas of Monterey County. Air quality in the Project area is managed and regulated by the Monterey Bay Air Resources District ("MBARD"). MBARD has developed Air Quality Management Plans ("AQMPs") and CEQA Air Quality Guidelines to address attainment and maintenance of state and federal ambient air quality standards within the NCCAB. The 2012-2015 AQMP, the 2008 CEQA Air Quality Guidelines, and 2016 Guidelines for Implementing the California Environmental Quality Act are the most recent documents used to evaluate attainment and maintenance of air quality standards. The

California Air Resources Board ("CARB") uses ambient data from each air monitoring site in the NCCAB to calculate Expected Peak Day Concentration over a consecutive three-year period. The closest air monitoring station is in Carmel Valley. There has been no indication that construction and operation of the Project would cause significant impacts to air quality or greenhouse gas emissions ("GHGs"). **CONSISTENT.**



Temporary Erosion Control Plan — Figure 8a

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

A. FACTORS

The environmental factors checked below would be potentially affected by this project, as discussed within the checklist on the following pages.

☒ Aesthetics	☐ Agriculture and Forest 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/Traffic	☒ Tribal Cultural Resources
☒ Utilities/Service Systems	☒ Wildfires	☒ Mandatory Findings of Significance

Some proposed applications that are not exempt from CEQA review may have little or no potential for adverse environmental impact related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a non-sensitive environment, and are easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impact (and not checked above), the following finding can be made using the project description, environmental setting, or other information as supporting evidence.

☐ Check here if this finding is not applicable

FINDING: For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation, or maintenance of the proposed project, and no further discussion in the Environmental Checklist is necessary.

EVIDENCE:

Agricultural and Forestry Resources: The California Department of Conservation Division of Land Resource Protection and the Farmland Mapping and Monitoring Program maps California's agricultural resources. The Proposed Project is designated as "Other Land" and therefore would

not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Source: 6). The Project is not zoned for agricultural use and is not under a Williamson Act contract (Source: 6). The Project site is designated as "Rural Community Center" and "Watershed and Scenic Conservation" in the 1982 County of Monterey General Plan ("General Plan") and zoned as "Visitor Service Commercial" with a Design District overlay, coastal zone or "VSC-D(CZ)". Although sited within a Redwood Forest, the Proposed Project would not result in the loss or conversion of forest land for non-forest land use. Therefore, there would be no impacts to agriculture and forestry resources.

Mineral Resources: Mineral resources are determined in accordance with the Surface Mining and Reclamation Act ("SMARA") of 1975, and the California Geological Survey which maps regional significance of mineral resources. There are no known mineral resources on the Project site (Source: 8). As a result, the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. Additionally, the Project site is also not designated as a mineral resource recovery site. Therefore, the Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site. The Proposed Project would not result in any impacts to mineral resources.

Population and Housing: The Proposed Project consists of the demolition of existing campground common spaces, construction of new campground common spaces, and improvements to the onsite utilities. The Project would not induce substantial population growth either directly or indirectly. The Project would not change the existing use of the site or increase the number of staff such that potential growth-inducing impacts would occur. The Big Sur Campgrounds maintains 35 employees on average throughout the year. Employees are existing residents of the surrounding area. Employee housing is available for 10-14 staff persons at an offsite location near the Project site, while remaining staff persons commute from other areas of Big Sur or Monterey Peninsula. No permanent onsite housing is provided to staff, and the Proposed Project does not include construction of onsite employee housing. Additionally, the Proposed Project would not displace existing housing units. Therefore, the Proposed Project would not result in any population or housing-related impacts.

Public Services: The Proposed Project would not result in any adverse impacts resulting in the need for new, or physically altered, government facilities to maintain acceptable service ratios, response times, or other performance objectives for any public services (i.e., fire protection, police protection, schools, parks, or other public facilities). The Project site is currently served by California Department of Forestry and Fire ("CalFire") and Big Sur Fire for fire and emergency services protection services. The Monterey County Sheriff's Department provides police protection services in Big Sur. The Carmel Unified School District ("CUSD") serves the community of Big Sur. The Proposed Project consists of the demolition of existing campground common spaces, and the construction of new campground common spaces and improvements to the onsite utilities. Therefore, the Proposed Project would not generate any new demand for public services beyond current levels associated with existing campground operation.

Recreation: The Project would not result in an increased use of existing neighborhood and/or regional parks or other recreational facilities causing a substantial physical deterioration. The Proposed Project consists of demolition of existing campground common spaces, and the construction of new campground common spaces mostly within the existing building footprints. Additionally, the Proposed Project would consist of improvements to onsite parking, site access, and utilities. Construction and operation of the Proposed Project would not change the use of the Project site or result in an increase in use as the number of overnight accommodations (i.e., RV/campsite) would not be changing. Therefore, the Proposed Project would not result in any adverse recreation-related impacts.

B. 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 — November 14, 2023 (Date)

Fionna Jensen, Senior Planner,
Monterey County Housing and Community Development

V. 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 take into account the whole action involved, including offsite as well as onsite, 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 mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

8) 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.

VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista? (Source:) (sources:10, 15,18,22,23)	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (sources: 10, 15,18,22,23)	☐	☐	☒	☐
c) 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 project conflict with applicable zoning and other regulations governing scenic quality. (sources: 10, 15,18,22,23)	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (sources: 10, 15,18,22,23)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The Project site is located within the existing Big Sur Campground and Cabins site and is surrounded by visitor serving accommodations and facilities of similar character (e.g., campgrounds, rustic cabins). The Project site is developed with existing campground common spaces, maintenance, and utilities facilities, and visitor overnight accommodations (A-frame cabins, RV/Park Mobile campsites). The perimeter of the Project site is densely vegetated by native and non-native plant species associated with Redwood Forest and riparian habitats. Highway 1 and the Big Sur River are directly east of the Project site, as illustrated in **Figure 1a and Figure 1b**.

The Proposed Project is located within Big Sur, and development is governed by the Big Sur Coast LUP and CIP and the 1982 Monterey County General Plan. Accordingly, the Big Sur Coast LUP defines the Critical Viewshed as "everything within sight of Highway 1 and major public viewing areas including turnouts, beaches, and the following specific locations: Soberanes Point, Garapata Beach, Abalone Cove Vista Point, Bixby Creek Turnout, Hurricane Point Overlook, upper Sycamore Canyon Road, Pfeiffer Beach/Cooper Beach, and species views from Old Coast Road." The Project site is located adjacent to Highway 1, which is a State designated scenic highway. Although existing topography and vegetation heavily screen the Project site, minimal and limited views of existing development (specifically the existing Gate House) are visible from Highway 1.

Big Sur Coast LUP Policy 3.2.5.A and CIP section 20.145.030.B1 provides an exception to the Critical Viewshed requirements for development located within a Rural Community Center which provide essential services to the community and visiting public. The subject property is within the the Big Sur Valley Rural Community Center (RCC) area. Therefore, although the Proposed Project is exempt from Critical Viewshed policies, Big Sur Coast LUP Policy 3.2.5.A states that development in RCCs shall be permitted under careful design and siting controls as provided for in specific policies listed in Big Sur Coast LUP Policy 5.4.3 and regulations contained in Title 20.

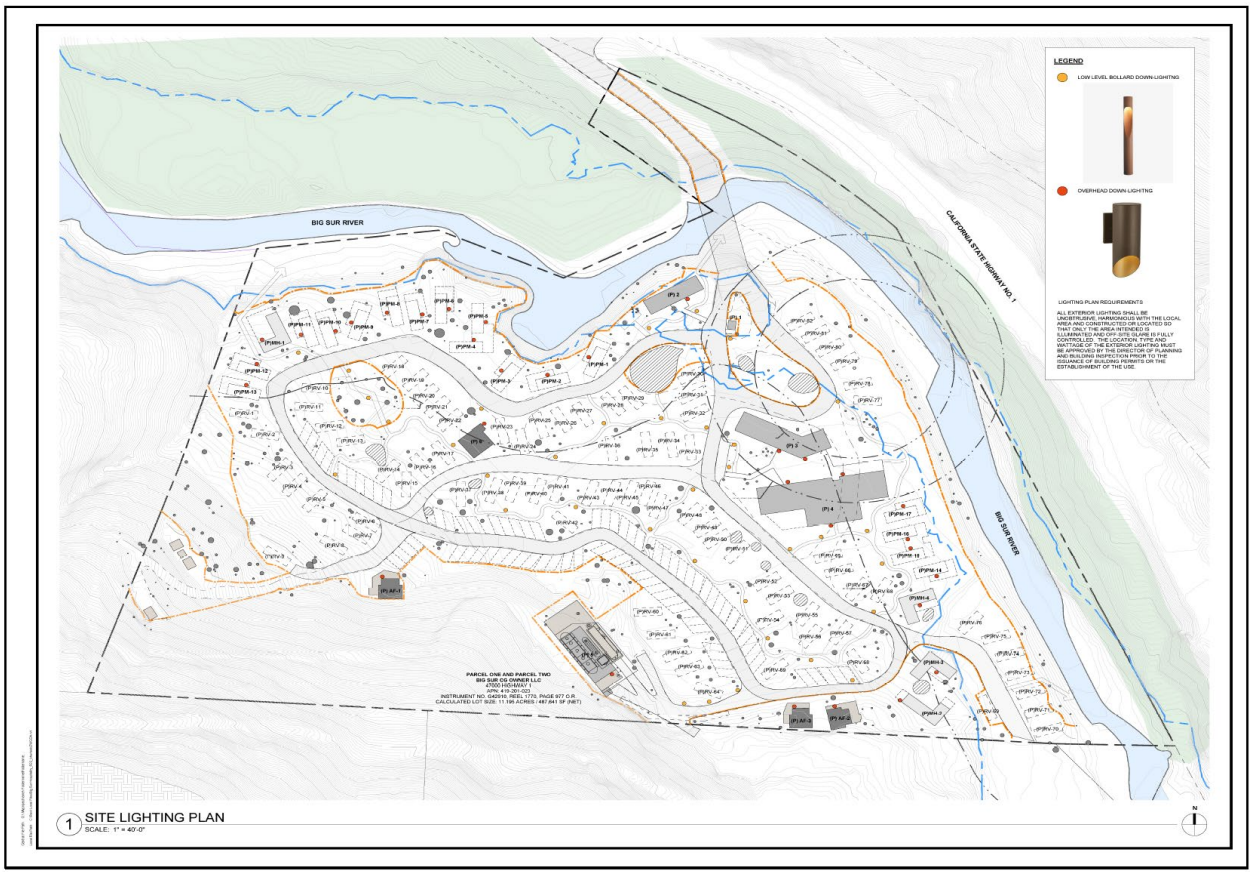
Aesthetic (a), (b), and (c) Less than Significant Impact: The Project site is currently developed with approximately 16,318 square feet of campground development and improvements, including 82 RV/campground sites, 17 Park Model RVs, 3 A-frame cabins, 4 mobile homes, and various common spaces. The project site is adjacent to Highway 1, a state scenic highway. The existing visual character of the site consists of dense vegetation. The existing conditions along the property frontage (i.e., facing Highway 1) consist of a row of Redwood trees, an approximate 20-foot-tall sign stating, "BIG SUR CAMPGROUNDS AND CABINS", and a US MAIL box utilized by the campgrounds. The Proposed Project would not alter the property's frontage development. Existing development is largely confined to areas not visible from Highway 1. However, as described above, where existing features are visible from the highway, they are generally small in scale and cohesive with the surrounding environment. The existing 313 square foot gate house, which is sited directly behind a mature Redwood tree, is visible from Highway 1 for less than a second when traveling southbound on Highway 1. Existing development, excluding the development along the property frontage, is not visible when traveling northbound on Highway 1. The Proposed Project would not substantially alter the appearance of the site from Highway 1 because the redevelopment would be sited in areas which are already development and largely not visible from the Highway. The Proposed Project would reduce visibility from Highway 1 as the gate house would be resited 30 feet further south and would decrease in size by 243 square feet (proposed at 70 square feet). All other proposed development would be consolidated in areas already developed and currently not visible from Highway 1. Moreover, the Proposed Project consists of the demolition of existing campground common spaces, and the construction of new campground common spaces and infrastructure improvements (i.e., relocation of septic system to address water quality concerns, underground existing utilities) to replace existing on-site utilities. The construction of the Proposed Project including staging and parking for construction vehicles and equipment would be contained within the Project site.

As stated above, the property abuts Highway 1 and is therefore located within the Highway 1 Critical Viewshed. However, because the Project site is located within the Big Sur Valley RCC, the Proposed Project is exempt from Critical Viewshed policies and subject to specific policies listed in Big Sur Coast LUP Policy 5.4.3 and regulations contained in Title 20. Policy 5.4.3.L(1) – (8) provide specific development policies for the Big Sur Valley. Relative to aesthetics, Policy 5.4.3.L.4 requires developments to incorporate tasteful, rustic designs using natural materials and careful siting of structures to meet scenic protection objectives; rather than the criteria of non-visibility, as existing development is already visible. Pursuant to MCC section 20.44.010, the purpose of the Design Control or "D" district is to regulate the location, size, configuration,

materials, and colors of structures where design review is appropriate to assure protection of the public viewshed and/or neighborhood character.

As discussed above, the Proposed Project consists of the demolition of existing campground common spaces, the construction of new campground common spaces and improvements to the onsite utilities. As designed, the Proposed Project's colors and materials would consist of wood siding, blackened steel and Corten steel (which will oxidize to a dark brown color) standing seam roofing, and wood decking. All proposed development would comply with the subject zoning strict height limitation of 35 feet. Thus, the Proposed Project would be designed to be visually compatible with the existing campground and surrounding visitor serving uses, sited and designed to be subordinate to the existing character of the area, and minimize all visibility from Highway 1. Therefore, the proposed development would result in a less than significant impact on a scenic vista and on views from Highway 1. Additionally, as designed, the Proposed Project would not impact any other scenic resources such as trees, rock outcrops, or historic buildings (see also Sections VI.4 and VI.5 and below regarding biological resources [including forest resources which are classified as Environmentally Sensitive Habitat Areas], and historic resources). Therefore, the Proposed Project would result in less than significant impacts to scenic resources such as trees, rock outcroppings, and/or historic buildings within a state scenic highway.

Aesthetic (d) Less than Significant Impact: The Proposed Project consists of the demolition of existing campground common spaces, construction of new campground common spaces, and improvements to the onsite utilities. The Proposed Project is located within an existing developed area associated with the Big Sur Campground and Cabin site that is improved with various sources of exterior lighting. The Proposed Project does not entail any nighttime construction-related activities; therefore, would not result in any temporary increases in construction lighting. Similarly, operation of the Proposed Project would not substantially increase lighting beyond existing conditions. The site is currently improved with various sources of campground lighting. The Proposed Project includes exterior lighting along pathways, campsites, and campground common spaces as illustrated **Figure 9**. All exterior lighting would comply with Condition No. 11 (PD014(c) – Lighting Exterior Lighting Plan), which required all exterior lighting to be unobtrusive, down-lit, compatible with the local area, and constructed or located so that only intended area is illuminated and off-site glare is fully controlled. Exterior lights would be required to have recessed lighting elements. Exterior light sources that would be directly visible from critical viewshed viewing areas are prohibited. Therefore, the Project would not result in a significant impact.



Site Lighting Plan	Figure 9

2. AGRICULTURAL AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (sources:6,8,18,22,23)	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (sources6,8,18,22,23:)	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)? (sources6,8,18,22,23:)	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use? (sources: 6,8,18,22,23)	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (sources: 6,8,18,22,23)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on agricultural or forest land resources.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan? (sources:15,18,20,21,22,23)	☐	☐	☐	☒
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? (sources: 15,18,20,21,22,23)	☐	☐	☒	☐
c) Result in significant construction-related air quality impacts? (sources: 15,18,20,21,22,23)	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations? (sources: 15,18,20,21,22,23)	☐	☐	☒	☐
e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (sources: 15,18,20,21,22,23)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The Proposed Project is located within NCCAB, which is under the jurisdiction of the MBARD. MBARD is responsible for producing an 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 Ambient Air Quality Standards ("AAQS"). Additionally, MBARD monitors criteria pollutants to determine whether they are in attainment or not in attainment. **Table 3-1** illustrates the attainment status for criteria pollutants.

Table 3-1 Attainment Status for the NCCAB

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

Table 3-1 Attainment Status for the NCCAB

Pollutants	State Designation	Federal Designation
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 3-2** illustrates the thresholds of significance used to determine if a project would have a significant air quality effect on the environment during construction.

Table 3-2 Thresholds of Significance Construction Emissions

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

Source: Monterey Bay Unified Air Pollution Control District, 2016. Guidelines for Implementing the California Environmental Quality Act.

In addition to these thresholds, MBARD has also determined that a significant short-term construction generated impact would occur if more than 2.2 acres of major earthmoving (i.e., excavation) per day was to occur. Activities associated with this threshold include excavation and grading. For projects that require minimal earthmoving activities, MBARD has determined that a significant short-term construction generated impact would occur if more than 8.1 acres per day of earthmoving was to occur (MBARD, 2008).

Table 3-3 illustrates the thresholds of significance used to determine if a project would have a significant air quality effect on the environment during operation.

Table 3-3 Thresholds of Significance Operational Emissions

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

Source: Monterey Bay Unified Air Pollution Control District, 2016. Guidelines for Implementing the California Environmental Quality Act.

The California Air Resources Board ("CARB") defines a sensitive receptor as children, elderly, asthmatic, and others who are at high risk of negative health outcomes due to exposure to air pollution. Pursuant to California Health and Safety Code Sec. 42705.5, a sensitive receptor includes hospitals, schools, day care centers, and such locations as the district or state board may determine. MBARD similarly defines sensitive receptors and adds that the location of sensitive receptors be explained in terms that draw a relationship to the Project site and potential air quality

impacts. The nearest sensitive receptors (i.e., residence, health care center, visitor serving accommodations) are located 750 feet from the Proposed Project site.

Air Quality (a) No Impact: CEQA Guidelines Sec. 15125(b) requires that a project be evaluated for consistency with applicable regional plans, including the AQMP. MBARD is required to update their AQMP every three (3) years. The most recent update was the 2012 – 2015 AQMP which was adopted in March 2017. This plan addresses attainment of the State ozone standard 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") and other indicators. Consistency determinations are issued for commercial, industrial, residential, and infrastructure related projects that have the potential to induce population growth. A project is considered inconsistent with the AQMP if it has not been accommodated in the forecast projects considered in the AQMP. The Proposed Project consists of the demolition of existing campground common spaces, construction of new campground common spaces, and improvements to the onsite utilities. The Proposed Project would be located within the existing Big Sur Campground and Cabins site and would not induce substantial population growth or result in the need for additional residential development beyond what currently exists. As previously discussed, the Proposed Project would not change the existing use of the site or increase the number of staff such that potential growth inducing impacts would occur. Therefore, the Proposed Project would not conflict with or obstruct an applicable air quality plan. There would be no impact.

Air Quality (b) and (c) Less than Significant Impact: 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).

According to the MBARD's criteria for determining construction impacts, a project would result in a potentially significant impact if it would result in 8.1 acres of minimal earthmoving per day or 2.2 acres per day with major grading and excavation.

Construction of the Proposed Project would require 5,135 cubic yards of grading and disturb approximately 5.2 acres. Approximately 3,800 cubic yards of cut associated with the installation of utilities would be returned to the utility trenches after installation. The remaining 1,335 cubic yards of cut would be hauled off-site. Construction would require equipment such as tractors, backhoes, excavators, loading trucks, and pickup trucks. Construction related emissions would come from sources such as exhaust or fugitive dust. Construction of the Proposed Project would

not, however, exceed MBARD's significance criteria. The Proposed Project would result in minimal ground-disturbing activities. Grading and excavation related activities would occur over several days and would not exceed MBARD's daily ground disturbing thresholds for excavation (2.2 acres per day) or grading (8.1 acres per day). Therefore, the Proposed Project would have a less than significant construction-related air quality impact.

The Proposed Project would implement standard construction Best Management Practices ("BMPs") related to dust suppression (e.g., watering active construction areas, prohibiting grading activities during periods of high wind (over 15 mph), covering trucks hauling soil, covering exposed stockpiles, etc.) thereby further ensuring temporary construction-related effects would be minimized. Additionally, the Proposed Project would be required to comply with MBARDs Rule 439. Rule 439 includes *Demolition and Deconstruction Notes* on the construction plans that address mechanisms for reducing air pollution during demolition of buildings (Condition No. 15). For these reasons, construction of the Proposed Project would have a less than significant impact on air quality.

The Project could result in operational emissions due to operational energy use and traffic. However, a significant impact resulting from operational emissions from Project activities is unlikely for several reasons. First, the Proposed Project would replace existing campground common spaces and infrastructure, with new campground common spaces and infrastructure (e.g., onsite parking, internal site access, and utilities [e.g., wastewater system]). Thus, the Proposed Project would not be increasing campground common spaces (common space reduction of over 4,00 square feet) and infrastructure within the Project site (impervious coverage reduction of approximately 3,246 square feet). Second, the Proposed Project would be constructed in accordance with contemporary building standards. The installation of energy efficient building upgrades would reduce operational energy demand. Third, the Proposed Project would not result in any additional traffic trips beyond those associated with existing campground operations. Therefore, there would not be any increases in operational emissions associated with traffic-related impacts. Fourth, the Proposed Project would not increase the number of visitor-serving accommodations. The Proposed Project would not increase the number of RV/campsites, mobile homes, A-frame cabins, or park model RVs within the existing Project site (i.e., Big Sur Campground and Cabins site). As a result, operational emissions associated with the Project would not exceed an applicable MBARD threshold of significance. As previously discussed, the Project consists of the demolition of existing campground common spaces, construction of new campground common spaces, and associated infrastructure. Operation of the Proposed Project would not result in an increase of criteria pollutants beyond existing levels. See **Section VI.5 Energy**, below, for more information regarding energy consumption. For these reasons, the Proposed Project would result in a less than significant impact to air quality during operation.

Air Quality (d) Less than Significant Impact: The Proposed Project is located within the existing Big Sur Campground and Cabins site. The nearest sensitive receptors, in this case residences, are located 750 feet from the Project site. CARB identifies sensitive receptors as children, elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Locations where sensitive receptors congregate may include hospitals, schools,

and day care centers. As discussed above, construction of the Project would generate temporary air quality impacts. However, these impacts would be temporary in nature and would not exceed the thresholds set by MBARD. Operation of the Proposed Project would not result in increased air quality impacts beyond existing levels, as the use of the Project site would not be changing. Therefore, the Project would not result in a significant impact.

Air Quality (e) Less than Significant Impact: Construction of the Project could generate temporary odors from construction equipment (e.g., diesel exhaust) which could be noticeable at times to campground visitors, staff, and others within the Project vicinity. However, construction generated odors would be temporary in nature and would not create objectionable odors that would affect a substantial number of persons. No new operational odors would be generated as a result of the Proposed Project. Existing operational odors onsite are generated from campfires. Campfire smoke could be noticeable to other Big Sur Campground and Cabins visitors. However, these odors would be consistent with the existing use and would not be considered offensive to campground visitors. This represents a less than significant impact.

4. BIOLOGICAL RESOURCES **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? (sources:14,15,18,22,23,30)	☐	☒	☐	☐
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 Game or US Fish and Wildlife Service? (sources: 14,15,18,22,23,30)	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (sources: 14,15,18,22,23,30)	☐	☒	☐	☐
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? (sources: 14,15,18,22,23,30)	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (sources: 14,15,18,22,23,30)	☐	☒	☐	☐

4. BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (sources: 14,15,18,22,23,30)	☐	☒	☐	☐

Discussion/Conclusion/Mitigation:

Fred Ballerini (Project Biologist) prepared a biological resources assessment for the Proposed Project in November 2022. The assessment, *Biological Assessment of Big Sur RV Campground and Cabins* (Source: 14; Monterey County Library No. LIB220346) evaluated potential impacts associated with the construction and operation of the Proposed Project. In addition to the biological assessment, Ono Consulting prepared an Arborist Report regarding tree protection and planning considerations, as well as a fuel management plan for the Proposed Project (Source: 30; Monterey County Library No. LIB220345). The following discussion summarizes the findings of these technical reports. The findings of these technical analyses are herein incorporated by reference consistent with the requirements of CEQA Guidelines Sec. 15150. For a more detailed discussion of biological resources, please refer to the technical reports available for review at the Monterey County HCD – Planning Office located in Salinas, California.

Construction and operation of the Proposed Project would occur in previously developed or disturbed areas. Exposed and baren soils dominate the Project site except for scattered planting beds landscaped with exotic species and large non-native lawn areas. While the Project site is highly degraded with invasive species and exhibits a lack of associated native habitat community constituents; the Project Biologist notes that the Project site is located entirely within an environmentally sensitive Redwood Forest habitat and Arroyo Willow Riparian habitat. However, the Project Biologist notes that there is nearly a complete lack of native redwood understory habitat throughout the site. This is existing development and hardscape being located in proximity to individual Coast Redwood trees found throughout the site. As observed during staff's site visit on November 29, 2022, individual Coast Redwood trees are serving as utility poles with the existing electrical lines being stapled to the trunks of these trees.

Native tress and associated understory communities are found outside the boundaries of the Proposed Project, but within the subject parcel. Species include Coast live oak (*Quercus agrifolia*), tan oak (*Notholithocarpus densiflorus*), big leaf maple (*Acer macrophylulum*), California buckeye (*Aesculus californica*), and California bay (*Umbellularia californica*). The Project Biologist also identified flowering species such as adelinia (*Adelinia gradis*), fairy bells (*Prosartes hookeri*), Douglas iris (*Iris douglasianna*), milkmaids (*Cardamine californica*), western trillium (*Trillium ovatum*), and woodland strawberry (*Fragaria vesca*).

Biological Resources (a, b, and c) Less than Significant Impact with Mitigation: The Proposed Project would not have a substantial adverse effect either directly or indirectly through habitat modifications on any species identifies as candidate, sensitive, or special status. The Project site is located within, or adjacent to, two habitats: Redwood Forest and riparian. Both habitats are designated as Environmentally Sensitive Habitat Areas ("ESHA"), and serve as important habitat for candidate, sensitive, and special status plant, and wildlife species. As described in more detail below, impacts to Redwood tree roots are expected to occur due to proximity of the proposed grading and trenching, specifically associated with grading activities. However, no tree removal is proposed or anticipated. Additionally, the Proposed Project would not have a substantial adverse effect on any riparian habitat or wetlands. As previously discussed, the Project site is located within the Big Sur River watershed. The Big Sur River runs parallel to the Project site along the eastern boundary of the Project parcel. The Big Sur River is an important habitat to state and federally listed Steelhead, Western pond turtle, Foothill yellow legged frog, California tiger salamander, Santa Lucia slender salamander, Coast Range newt, California red-legged frog, and a variety of raptor and bird species. Moreover, the Proposed Project would be consistent with the existing permitted use and the site has, and would continue to be, routinely used, and disturbed in connection with the existing use. Nonetheless, due to the site's proximity to the Big Sur River and the listing as Critical Habitat for California red-legged frog, the Proposed Project may have a potentially significant impacts on special status species. Implementation of **Mitigation Measures Nos. 1** through **10**, as detailed below, would reduce this impact to a level of less than significant.

The Big Sur River Watershed Management Plan requires riparian buffer zones between the river and campsites. Accordingly, no structural development would be located within 25 feet of the Big Sur River. However, three Park Models and five campsites would be located approximately 20 feet from the Big Sur River, while still setback from the top of back. There is no native vegetation in the areas of encroachment due to existing campsite disturbance. The Proposed Project includes installation of exclusionary habitat fencing along the top of the riverbank at the edge of the campsites to prevent future visitor impacts. Furthermore, construction of the new septic system would be located more than 100 feet from the riverbank. Replacing the existing septic system with a new septic system that is setback from the river would ensure that potential water quality impacts associated with the existing system would be eliminated. In addition, the Proposed Project would restore 33,540 square feet of riparian habitat that has been historically disturbed due to the introduction of non-native species, ornamental landscaping, and on-going visitor use. The restoration of this area would have a net beneficial impact on riparian habitat. To ensure the Project site is successfully and effectively restored, and potentially significant impacts to riparian habitats and protected wetlands (i.e.. Big Sur River) remain less than significant, the Proposed Project would implement **Mitigation Measure No. 9**, as discussed in more detail below.

Coast Redwood Forest

As noted above, the Project site is located within environmentally sensitive Redwood Forest natural community dominated by the Coast Redwood (Sequoia sempervirens). This habitat is identified in the Big Sur Land Use Plan as Environmentally Sensitive Habitat Area (Ref. Policy 3.3) and is also identified as a natural community "rare and worthy of consideration" by the CNDDB. The project lies within the southern extension of the natural Redwood Forest range

(Northern Santa Lucia Mountains). The Project Biologist categorizes the Project site's forest community as "a nonfunctioning ecological system and monolithic, with understory constituents nearly non-existent due to the intensive, seven decades-long anthropogenic impacts associated with high density camper use and past development and infrastructure." Implementation of the Proposed Project would involve no removal of natural community vegetation as the site is void of native habitat conditions. Additionally, no tree removal is proposed, though potential impacts to Redwood trees and their roots may occur as a result of Project related disturbance, specifically the replacement utility lines. All existing, aging infrastructure elements including water, electric and septic (treatment system, septic tanks and leach fields) are proposed for replacement. Siting of infrastructure elements have been field-assessed though coordination with various consultants (Project Biologist, Arborist, and Engineers) to determine the most appropriate siting while minimizing potential root impacts of Redwood trees.

As designed and mitigated (**Mitigation Measure No. 7**), the Project would include approximately 40,407 square feet of Redwood Forest understory restoration within the Project site. Several areas across Big Sur Campgrounds and Cabins are characterized by dense Redwood groves. These groves and associated understory would be fully restored and closed off to pedestrian foot traffic through installation of habitat restoration fencing. Three elevated boardwalks would be installed in and around these Redwood groves to allow controlled internal circulation while ensuring the focused understory restoration is successful. In areas throughout the Project site where smaller stands of Redwood trees, ornamental landscaping, and exposed soils exist, and additional soils disturbance would occur through implementation of this Project, approximately 59,357 square feet of native landscape is proposed (**Mitigation Measure No. 7**). This native landscaping would create between a 30 to 200+ foot native vegetation buffer along the Big Sur Riverbank and surround the proposed internal walking paths. Although no Project impacts would occur outside of the existing campground and common space areas, the Applicant proposes preservation of approximately 76,661 square feet of Redwood Forest understory on the hillside to the south of the Project site. Preservation protocols and success criteria have been implemented into **Mitigation Measure No. 7**.

Relocation of the Project sites 106 visitor serving accommodation units (RV campsites, Park Model RVs, Mobile Homes, and A-Frame Cabins) also includes installation of water, electrical, and septic connections to each site. To support the proposed advanced septic system, five primary absorption trenches, five secondary (reserve) absorption trenches, and six below-ground septic containment tanks are proposed. Although these septic improvements and associated trenching/grading work would be largely located within pre-existing disturbed campsites and hardscapes (parking areas and internal roads), these improvements would be sited within critical root zones of nearby Redwood trees and thus result in potentially significant impacts. **Mitigation Measure Nos. 3 and 6** has been incorporated to ensure impacts associated with installation of the Proposed Project's utility improvements are less than significant. All other proposed structures (including the gate house, an outfitter building, campground check-in, and cafe/bathrooms) would be sited in previously disturbed locations. These structures would utilize a helical anchor system, rather than traditional foundation systems, to minimize root and soil disturbance. However, to ensure the anchor locations do not have significant impacts on Redwood tree roots, **Mitigation**

Measure No. 3 has been applied. Additionally, tree protection measures would be required to prevent inadvertence damage to redwood trunks during construction activities (**Mitigation Measure No. 6**).

The prepared Biological Assessment referenced studies that concluded that removal of up to 40% of the absorbing roots of Coast Redwoods is unlikely to have a substantial effect on the overall health and stability of the tree because absorbing roots are ephemeral and reproduce rapidly (Harris, Clark, and Matheny 1999). Removal or shaving of up to 20% of the structural support roots is unlikely to affect tree stability as Coast Redwood trees generally have a safety factor in the range of 4.5 times the strength required to resist the expected stress load (Dunster 2009). None of the subject trees in the Project site are proposed to be affected to this extent as hand trenching and bridging are proposed when structural roots are encountered. As proposed and detailed in the prepared Arborist Report, root disturbances would be confined to 30% of the root zones for each individual tree and would be well within the adaptive capabilities of the redwood trees. Coast Redwoods are renowned for their capability of compensating for disruptions to their root systems through a variety of characteristics, including resiliency, widespread lateral root structure, buttress flaring, and ability to tolerate heavy siltation accumulations by growing successionally higher root systems. However, implementation of **Mitigation Measure Nos. 3, 4, 6,** and **7** would ensure that potential root impacts are reduced to a level that supports the long-term health of the Redwood trees, as required by the Big Sur Coast LUP and CIP.

Wildlife Species

The Proposed Project is located adjacent to the Big Sur River, which is a recognized resource of statewide significance and important steelhead (*Oncorhynchus mykiss*) and trout habitat under the California Protected Waterways Act. The Big Sur River Protected Waterway Management Plan addresses pertinent issues and concerns regarding the Lower Big Sur River Basin and identifies riparian habitat as *Environmentally Sensitive* and is identified as a natural community *rare and worthy of consideration* by the California Natural Diversity Data Base ("CNDDB"). The Project Biologist found that due to the degradation of habitat throughout the Project site and surrounding property, cover and habitat value was limited. During the nine (9) field surveys completed by Fred Ballerini, no special-status wildlife species were observed; however, survey protocols were not conducted for several listed special status species due to their presence being previously documented in the Big Sur River.

The Big Sur River provides a wildlife movement corridor for eight (8) species of fish, six (6) amphibians, eight (8) reptiles, 27 mammals, and 148 species of birds. Habitat for passerine birds, raptors, and waterfowl are also available along the riparian corridor and within Redwood tree canopy. The aquatic environment supports documented habitat for Pacific Lamprey (*Entosphenus tridentatus*), a CDFW Species of Special Concern, and South-Central Coast Steelhead, a federally threatened and state species of special concern. As detailed above, although no special-status wildlife species were observed within the development areas of the subject parcel, or the immediate vicinity, several federal and state-listed species are documented as inhabiting the lower river basin. The Biological Assessment determined that the Project site and local vicinity contain suitable habitat for Western Pond Turtle, Pacific lamprey, Foothill yellow-legged frog, California

red-legged frog, and Steelhead, and therefore the potential for these species to inhabit the Project site is high. The Proposed Project is in an area listed as Critical Habitat for California Red Legged Frog by the United States Fish and Wildlife Service ("USFWS"). However, the Project Biologist did not observe supporting breeding habitat within the development area, and due to the lack of supporting habitat conditions as a result of extensive development and use by the campground, concluded that it would be unlikely that California red legged frogs would be present within the site. **Mitigation Measure Nos. 2** and **3** have been applied to reduce impacts to these species to a level of less than significant. The Biological Assessment also determined that although the Project site soils are generally unsuitable, California tiger salamander and the California horned lizard have low to moderate potentials to inhabit the Project site and thus **Mitigation Measure Nos. 2** and **3** has been applied to reduce impacts to these species to a level of less than significant.

Additionally, although not observed during the Project Biologist's numerous surveys, the Project site contains potential habitat throughout the forested areas suitable for the Monterey dusky-footed woodrat, a federally endangered species. Adherence to **Mitigation Measure Nos. 2** and **3** has been applied to reduce impacts to these species to a level of less than significant.

As of September 30, 2022, the Western bumble bee (WBB) and Crotch's bumble bee (CBB) are a candidate species under CESA and as such, receives the same legal protection afforded to an endangered or threatened species. The flight period for both bumble bee species in California is from early February to October, peaking in late June and late September. The flight period for workers and males is from early April to early November. The WBB species is currently restricted to high elevation sites in the Sierra Nevada and scattered coastal areas, while the CBB inhabits open grassland and scrub habitats. The WBB and CBB primarily nest underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under brush piles, in old bird nests, and in dead trees or hollow logs. Overwintering sites utilized by WBB and CBB mated queens include soft, disturbed soil, or under leaf litter or other debris. The Project Biologist confirmed via phone on November 8, 2023, that WBB and CBB have a low potential to occupy the site given the Project site's minimal botanical vegetation. Additionally, CDFW has informed the County that these bumble bee species have a historical range that include the Project site. However, should WBB or CBB colonies or overwintering queens be present in underground nests in work areas, work activities related to the Proposed Project could adversely affect this species and its habitat. Therefore, mitigation would be required to reduce impacts to a level of less than significant (**Mitigation Measure No. 10**) **Mitigation Measure No. 10** would require the Project Biologist to conduct a pre-construction survey. If CESA-protected bumble bees are observed, the Project Biologist would consult with CDFW to determine appropriate avoidance measures, including but not limited to, obtaining an Incidental Take Permit (ITP).

Although the Project site is regularly occupied by staff and campers (fluctuates with seasons), the property's mature Coast Redwood trees may provide roosting and nesting habitat for a variety of bird species protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code, Section 3504. The Project Biologist noted that it is probable that a variety of mammals and nesting migratory birds breed, forage and find cover among the fringe vegetation elements within

and surrounding the Project site. Avian species which have moderate to high probability of occupying the Project site include: Cooper's hawk, Sharp-shinned hawk, White-tailed Kite, Merlin, California spotted owl, Olive-sided flycatcher, Purple martin, Western Bluebird, and Yellow warbler. Foraging and nesting habitat is present to potentially support yellow warbler and tricolored blackbird in riparian habitats, although neither of these birds was observed during spring bird surveys. The Project Biologist also observed a number of raptor species, including Red-shouldered hawk, Red-tailed hawk, and Turkey vultures flying over the subject property on several occasions. No raptor nests were observed within the Project site or Biological Assessment survey area, however potential raptor nesting habitat exist within in large Redwood, Red alder, Coast live oak and Bay trees around the subject property and on adjoining properties. If construction is conducted during the general bird breeding season (January 15 through August 31), temporary direct impacts from disturbance and displacement of nesting birds during vegetation removal could result in significant direct impacts to bird species protected under the MBTA, and mitigation would be required. Application and adherence to the County's standard Raptor/Migratory Bird Nesting Condition of Approval (Condition No. 16) would lessen impacts to avian species to a level of less than significant.

The special status bat species also have a moderate potential to occupy the nearby forested area or structures slated for demolition: the Pallid bat, Yuma (San Joaquin) myotis, Long-legged myotis, Small-footed myotis, Fringed myotis, and Long-eared myotis. These species are classified as endangered species under the California Endangered Species Act. To reduce potential impacts to bat species, **Mitigation Measure No. 5** has been applied.

Central Coast Arroyo Willow Riparian

Discontinuous thickets of Arroyo Willow Riparian habitat were observed along the riverbanks of the Project site. The habitat was marked by clumps of shrubby arroyo willow (*Salix lasiolepis*). The largest willow thicket was observed downstream near the northwestern end of the Project site, and discontinuous and smaller thickets were located upstream and complimented by western sycamore (*Platanus racemose*), black cottonwood (*Populus trichocarpa*), big leaf maple (*Acer macrophylla*), and white alder (*Alnus rhombifolia*). These species included California polypody (*Polypodium californicum*), alum root (*Heuchera micrantha*), vanilla grass (*Anthoxanthum occidentale*), western sword fern (*Polystichum manitum*), coastal wood fern (*Dryopteris arguta*), and redwood sorrel (*Oxalis oregana*). Coast Redwood, California bay, Tan oak, Buckeye, and Coast live oak also occur on the upland slopes and along the bank of the campground side of the river. Sparse pockets of remnant understory species were observed in areas out of reach by human induced impacts.

In the area of the Project site, the existing and historical visitor use has significantly reduced the riparian vegetation along the riverbank due to wood collecting, tramping of newly germinating and established plants, cutting of vegetation and trail systems that radiate down the banks from campsites. These activities have collectively resulted in a loss of vegetation, compaction of soils, bare soil exposure, tree damage, and root exposure. Areas of riparian habitat have also been colonized by invasive plants, which in several areas dominate the limited native understory. Identified invasive species include highly invasive English ivy (*Hedera helix*) and to a lesser degree moderately invasive periwinkle (*Vinca major*), veldt grass (*Ehrharta erecta*), inch plant

(*Tradescantia zebrina*) and kikuyu (*Pennisetum clandestinum*). **Mitigation Measure No. 9** has been applied to ensure eradication of the Project site's invasive species. Coupled with the visitor impacts, these exotic species infestations have completely altered the native species composition and ecology of the natural riparian habitat, to the detriment of native plants and wildlife. The Arroyo Willow Riparian habitat is considered ESHA and are therefore subject to the protection policies (Chapter 3.3) of the Big Sur Coast LUP. Adherence to **Mitigation Measure No. 9** would reduce impacts to the riparian habitat to a level of less than significant by requiring preparation and implementation of a Riparian Restoration Plan. As proposed, and mitigated, the project would restore approximately 33,540 square feet of the Big Sur Riverbank where native vegetation is severely degraded from decades of visitor impacts. Additionally, as detailed in the Proposed Project plans, entry points down to the Big Sur River from the Project site would be reduced from approximately a dozen informal routes to three formalized dirt paths. The restoration of this area would have a net beneficial impact on the subject property's riparian habitat. Implementation of a Riparian Restoration Plan would comply with riparian restoration recommendations outlined in the Big Sur River Watershed Management Plan and Lower Big Sur River Protected Waterway Management Plan, which call for the protection, maintenance and enhancement of riparian habitat and the Big Sur River's watershed. No work would be conducted in the stream channel that would require a Streambed Alteration Agreement prepared by the California Department of Fish and Wildlife. However, the proposed Riparian Restoration Plan (**Mitigation Measure No. 9**) shall be presented to the CDFW and USFWS for review and collaboration to assure compliance with federal and state mandates and protection of resources.

Mitigation Measures

Mitigation Measure No. 1– Project Biologist

In order to ensure grading, construction, and restoration activities are conducted in accordance with the recommendations contained in the Biological Assessment (LIB220347) and Arborist Report (LIB220345), the Applicant/Owner shall submit to HCD-Planning for review and approval a copy of a contract with a qualified biologist (the Project Biologist). The contract shall ensure that Mitigation Measure Nos.1 through 10, and the County's standard "RAPTOR/MIGRATORY BIRD NESTING" Condition of Approval, and their respective actions are implemented on the subject parcel. The contract shall include:

- Review and approve dispersal field and utility trenching locations and monitor installation activities.
- Pre-construction surveys for any special status wildlife (amphibian and mammal) species that could occur within the project-related construction, demolition, vegetation removal, or utility trenching, including but not limited to Monterey dusky-footed woodrat, Western pond turtle, Foothill yellow legged frog, California tiger salamander, California red-legged frog, Santa Lucia slender salamander, and Coast Range newt, in accordance with Mitigation Measure No. 2.
- Monitoring of all site grading, construction, demolition, and removal of surface vegetation and preparation of a final report detailing monitoring activities in accordance with Mitigation Measure No. 3. Monitoring shall occur daily for special status wildlife species and weekly for compliance with tree protection measures, until deemed unnecessary by the

Project Biologist. A construction crew member shall be designated to oversee compliance Mitigation Measure No. 3 after completion of initial ground disturbing activities.

- Preparation and presentation of a Biological and Forest Resources Awareness Training program in accordance with Mitigation Measure No. 4.
- Pre-demolition/construction survey for any bats in accordance with Mitigation Measure No. 5.
- Review and approve installation of tree protections measures and prepare a letter confirming compliance with Mitigation Measure No. 6.
- Preparation, implementation, and monitoring of a Redwood Forest Restoration Plan in accordance with Mitigation Measure No. 7. Consultation with the Project Landscape Architect to prepare the associated Landscape and Restoration Plan.
- Preparation of a Campground Management Plan in accordance with Mitigation Measure No. 8.
- Preparation, implementation, and monitoring of a Riparian Restoration Plan Monitoring, in accordance with Mitigation Measure No. 9.
- Pre-construction surveys for the Western bumble bee and Crotch's bumble bee in accordance with Mitigation Measure No. 10.
- Pre-construction surveys for potential nesting bird within 300 feet of proposed construction activities (if construction or demolition activities occur from February 1 to September 1), in accordance with the Migratory Bird Treaty Act/County's standard "RAPTOR/MIGRATORY BIRD NESTING" Condition of Approval.
- Preparation of a report as to incidents regarding special status species, including the Western pond turtle, the Foothill yellow legged frog, California tiger salamander, California red-legged frog, Santa Lucia slender salamander, Coast Range newt, Western bumble bee, and Crotch's bumble bee. Such report shall be submitted to HCD-Planning prior to final inspection.
- Final report submitted to HCD-Planning for review and approval that is sufficient in detail to explain how protection objectives have been met and any impacts incurred outside those previously analyzed including, though not limited to deviation from measures, modifications required in the field, occurrences of halting construction and/or any other issues identified.

Compliance Actions for Mitigation Measure No. 1

1a: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, Owner/Applicant shall submit to HCD-Planning for review and approval of the contract with the Project Biologist. Should HCD-Planning find the contract incomplete or unacceptable, the contract will be returned to the Owner/Applicant and a revised contract shall be re-submitted to HCD-Planning for review and approval.

1b: Prior to final of any State HCD Permit, Applicant/Owner/Project Biologist shall submit to HCD-Planning a brief report prepared by the Project Biologist as to incidents regarding the species indicated in Mitigation Measure Nos. 2, 3, 5 and 6.

1c: Prior to final of any State HCD Permit, Owner/Applicant/Project Biologist shall submit to HCD-Planning for review and approval final reports prepared by the project biologist.

Mitigation Measure No. 2 – Special Status Species Pre-Construction Surveys

Within 7 hours prior to the start of demolition, construction, vegetation removal, or grading, a qualified biologist shall survey permanent and temporary impact areas for any special status wildlife (amphibian and mammal) species that could occur on the property, including but not limited to Monterey dusky-footed woodrat, Western pond turtle, Foothill yellow legged frog, California tiger salamander, California red-legged frog, Santa Lucia slender salamander, and Coast Range newt. During rain events, the preconstruction survey shall be conducted during the same day and immediately prior to the start of construction. The pre-construction survey shall be repeated for any new phase of construction to begin at a later time. Construction activities can begin once it has been determined that there are no sensitive animals within impact areas. If any special status specie individuals are found within the impact area or would otherwise be at risk during construction, work activities shall be delayed in that particular area and the animal allowed to leave the work zone on its own volition. Individuals can be captured and relocated outside of the work area by a qualified biologist if authorization is provided by California Fish and Wildlife (CDFW), or United States Fish and Wildlife Service (USFWS) for federally listed species such as the California red-legged frog (CRLF). The project Biologist shall monitor the area to determine when individuals of special-status species have left, and work can commence. The Project Biologist shall submit a report detailing the methods and results of the pre-construction survey to HCD-Planning prior to commence of ground disturbance, construction, or demolition. The report should detail any sensitive species found during the survey and measures taken for their avoidance. Observations of special-status species shall be submitted to the CNDDB. All construction activities should cease one half hour before sunset and should not begin prior to one half hour after sunrise. The following BMP and avoidance measure language shall be incorporated into construction and grading plans to ensure no CLRF or other special status species are entrapped or killed:

- "To prevent inadvertent entrapment of CRLF or any other special status species during project activities, all excavated, steep-walled holes or trenches more than two feet deep will be covered at the close of each working day with plywood or similar materials. Prior to filling any excavated areas, they will be thoroughly inspected for trapped animals."
- "No plastic mono-filament matting shall be used for erosion control, as this material can ensnare wildlife, including CRLF and other special status species. Tightly woven natural fiber netting, including coconut coir mats may be used for erosion control at the project site."
- "CRLF are most actively foraging and dispersing during dawn and dusk hours. As a result, all construction activities should cease one half hour before sunset and should not begin prior to one half hour after sunrise."

Compliance Actions for Mitigation Measure No. 2

2a: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the language of this mitigation

measure shall be incorporated into the final construction, demolition, and grading plans.

2b: Prior to commencement of ground disturbing activities, the Applicant/Owner shall submit the results of the pre-construction survey to HCD – Planning for review and approval. If CRLF or any other special status species is observed, construction activities will not commence until CDFW or USFWS is consulted, and appropriate actions are taken to allow project activities to continue.

Mitigation Measure No. 3 – Biological Monitor

The Project Biologist shall monitor on a daily basis all initial site grading, construction, demolition, and removal of surface vegetation for special status species, including but not limited to Monterey dusky-footed woodrat, Western pond turtle, the Foothill yellow legged frog, California tiger salamander, California red-legged frog, Santa Lucia slender salamander, and Coast Range newt. The Project Biologist shall view the activities from a safe distance using binoculars and walk through searching freshly disturbed soils during breaks in the work. If any special-status mammal species are found, Project Biologist shall establish an appropriate buffer and monitor the area until the species leaves on its own volition. If any special-status amphibian species are found, work shall be delayed until the species has/have left the work area or California Department of Fish and Wildlife (CDFW)/United State Fish and Wildlife Service (USFWS) shall be notified to obtain authorization for capture and relocation. If no special status species are found during preconstruction surveys or follow-up monitoring, work may proceed. After completion of initial activities, the Project Biologist shall designate a construction crew member, who received apocopate biological awareness training, to oversee compliance with this mitigation measure. The construction monitor or Project Biologist is authorized to stop work if the avoidance and/or minimization measures are not being followed. The qualified biologist and the construction monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the project. The construction monitor shall submit the daily logs to the Project Biologist quarterly throughout ground disturbing and construction related activities.

The Project Biologist shall also ensure the best management measures and protective measures outlined in Mitigation Measure No. 6 are adhered to throughout construction activities. The Project Biologist shall monitor grading activities weekly for compliance with tree protection measures until deemed unnecessary. Monitoring occurrences shall increase as needed when grading activities are anticipated to impact Redwood tree roots. If grading activities are located within close proximity to and anticipated to impact any Redwood tree root over 2 inches, all work shall stop within 50 feet, and the Project Biologist shall be contacted and recommend avoidance measures. The Project Biologist shall monitor and advise on initial siting and installation of the helical anchor system to ensure impacts to tree roots are minimal. Impacts to structural tree roots which may result death or substantial decline in the health of the tree is prohibited. Although not anticipated, should impacts to structural tree roots occur, HCD-Planning shall be contacted and appropriate remediation actions, developed in coordination with the Project Biologist and a qualified Arborist, shall be enforced.

Prior to final inspection, the Project Biologist shall submit all daily/weekly monitoring logs and a final report detailing compliance with Mitigation Measure 3 and 6 to HCD-Planning for review and approval.

Compliance Actions for Mitigation Measure No. 3

3a: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the Applicant/Owner shall submit evidence (i.e., contract) to HCD – Planning for review and approval demonstrating that the Applicant/Owner has retained a qualified biologist to conduct on-going monitoring.

3b: During initial ground disturbance activities, the Project Biologist shall monitor the site and complete a daily log summarizing activities and mitigation measure compliance. If any special status species is observed, all work shall stop, and the project biologist who shall contact the CDFW or USFWS for emergency consultation.

3c: After initial ground disturbance activities are completed, the Project Biologist shall designate a construction crew member to oversee compliance with this mitigation measure. The designated construction monitor shall monitor the remainder of ground disturbing and construction-related activities and complete a daily log summarizing activities and mitigation measure compliance. If any special status species is observed, all work shall stop, and the construction monitor shall contact the project biologist who shall contact the CDFW or USFWS for emergency consultation.

3d:During grading activities, the Project Biologist shall monitor the site weekly for compliance with Mitigation Measure No. 6 (Tree Protection and Construction Management Plan) and prepare a log summarizing activities and compliance.

3e: On and on-going basis throughout grading activities, if grading activities are anticipated to impact any Redwood tree root over 2 inches, all work shall stop, and the Project Biologist shall be contacted.

3f: Prior to final of State HCD permits, the Project Biologist shall submit a report containing all daily and weekly monitoring activities, observations, and implemented avoidance measures to HCD-Planning for review and approval.

Mitigation Measure No. 4 – Biological and Forest Resources Awareness Training

In order to minimize potential impacts to Redwood trees, California red-legged frogs and other wildlife species that could occur on site, the Project Biologist shall prepare and present a coordinated Biological and Forest Resources Awareness Training program to all project personnel. This training shall educate the construction crew on the following: 1) review project boundaries; 2) biological monitoring and safety protocols during such activities; 3) identification of the special-status species that may be present; 4) the specific mitigation measures that will be incorporated into the construction efforts; 5) the general provisions and protections afforded by the United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW); 6) the proper procedures if a special-status species is encountered within the project site; and 7) tree protection techniques and guidelines including hand digging requirements. All project personnel who attended the training shall sign an attendance sheet. The program shall be repeated for any new crews that arrive subsequently on the project site. Aspects of the training shall include:

- All tree protection measure and excavation guidelines detailed Arborist Report (HCD-File No. LIB220345);
- Delineation of the allowable work area, staging areas, access points and limits to vehicle access;
- Locations of setback areas from streams, wetlands, and other sensitive biological resources (e.g., nests) that shall be avoided during construction. These areas shall be delineated by construction fencing and maintained throughout the project;
- Maintenance requirements for the wildlife exclusion fencing, if used;
- Storage of all pipes, metal tubing, or similar materials stored or stacked on the project site for one or more overnight periods shall be either securely capped before storage or thoroughly inspected for wildlife before the materials are moved, buried, capped, or otherwise used;
- Inspection of materials stored onsite, such as lumber, plywood, and rolls of silt fence, for wildlife that may have sheltered under or within the materials;
- Use of netting to exclude birds from nesting in construction materials;
- Wildlife protection measures for excavations and trenches;
- Contact information for the Project Biologist and instructions should any wildlife species be detected at the work site;
- Dust suppression methods during construction activities when necessary to meet air quality standards and protect biological resources;
- Stormwater BMPs; and
- Methods for containment of food-related trash items (e.g., wrappers, cans, bottles, food scraps), small construction debris (e.g., nails, bits of metal and plastic), and other human-generated debris (e.g., cigarette butts) in animal-proof containers and removal from the site on a weekly basis.

Compliance Actions for Mitigation Measure No. 4:

4a: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the Applicant/Owner shall submit the Biological and Forest Resources Awareness Training program to HCD – Planning for review and approval. The Applicant/Owner shall maintain records of all attendance sheets and shall provide copies of the attendance logs to HCD – Planning prior to commencement of ground disturbing activities.

4b: During construction activities, the safety protocols and avoidance measures detailed in the Biological and Forest Resources Awareness Training program shall be adhered to.

Mitigation Measure No. 5 – Bat Pre-Construction Survey

Within seven days prior to the start of demolition, the Project Biologist shall survey the trees within 50 feet of the limits of disturbance for tree cavities that can be used by bats. Buildings to be removed or impacted should also be assessed. If no such cavities or areas of guano are found, work may proceed. Any potentially suitable cavities or structures showing evidence of bat activity (i.e., guano piles, urine stains, prey remains) shall be monitored by the Project Biologist during the evening to determine whether bats leave for foraging. The cavities should be monitored from at

least one hour before sunset and viewed with the aid of binoculars. If any bats are observed leaving roost sites, the biologist shall coordinate with the County and California Department of Fish and Wildlife (CDFW) on appropriate methods to ensure the exclusion and successful relocation of individuals to suitable habitat nearby. The Project Biologist shall determine whether a maternity roost is present by carefully observing individuals on the roost. It is possible that a mirror on a pole and/or a fiber optic scope may be used. If young are present, construction shall be delayed until they have matured and can fly on their own. When it has been determined that no young are present, the Project Biologist shall monitor the roost in the evening when the bats leave to forage and then install bat exclusion netting over the opening. The bat exclusion netting shall be inspected the following morning to ensure that no bats have become entangled in the netting and that none remain inside the cavity. The netting shall remain in place on trees to remain until construction disturbance has ceased. The Project Biologist shall monitor the removal of any trees with bat exclusion netting. If any bats are found, work shall be halted until measures are taken to effectively exclude the bats.

Compliance Actions for Mitigation Measure No. 5:

5a: No more than seven days before the initiation of demolition or construction-related activities, the Applicant/Owner shall submit the results of a pre-construction bat survey, prepared by the Project Biologist, to the HCD – Planning for review and approval. If any bats are found, the Project Biologist shall contact appropriate agencies, including HCD-Planning and CDFW to determine appropriate methods to ensure the exclusion and successful relocation of individuals.

5b: On an ongoing basis, if bat exclusion netting or other protective measure is required, the Project Biologist shall ensure that the measure is intact or adhered to throughout construction activities.

Mitigation Measure No. 6 – Tree Protection and Construction Management Plan

To ensure impacts to nearby trees are less than significant, protective measures shall be incorporated into excavation activities and installed around native trees in close enough proximity to the proposed work. The following tree protection measures shall be implemented into a Construction Management Plan and adhered to throughout construction activities.

- Where feasible, protective fencing shall be installed at or beyond the drip line of the tree or group of trees in close proximity of the proposed work. For trees expected to be impacted by trenching activities, the trunks of such trees shall be wrapped with suitable materials (e.g., 2x4 lumber forming a protective barrier around the lower trunk, secured with rope, and wrapped with high visibility construction fencing) to prevent inadvertent damage from construction equipment or grading activities. Fencing shall be installed at a minimum height of 4 feet.
- Spread heavy plastic sheeting on the ground within the stockpile area.
- Soil compaction, parking of vehicles or heavy equipment, stockpiling of construction materials, and/or dumping of materials are not allowed adjacent to trees on the property, especially within the Critical Root Zone, and no washing of construction substances shall occur within this area.
- Installation of protective construction fencing around the grading and construction limits.

- All chemical wastes, such as paint thinner and other cleaning solutions and by-products shall be collected, containerized, and disposed of at a proper dump site.
- When vehicle access is required into a forested or off-pavement area, lay down a temporary, plywood track between the nearest roadway and the destination point.
- Where grading changes and cuts are unavoidable, preserve the maximum number of tree roots by terracing or constructing a dry retaining wall. Do not backfill with earth or rocks around the trunk of trees. If the grade immediately around a tree must be elevated, first construct a vertical well of stone or concrete around the tree, to keep soil away from where the trunk enters the ground. Then construct a drainage system at the original soil level to allow air and water penetration to the roots, and water drainage away from the root crown.
- Do not remove more than 30% of the total tree roots of any given tree and avoid cutting any tree roots that are 2 inches or larger in diameter (structural roots). When encountering a tree root of 2 diameter inches or larger, the Project Biologist shall be contracted and only hand digging shall be used to either tunnel under the root or adjust the excavation system in the field to avoid the roots.
- Tree roots that are under 2 inches may be cut, but proper techniques must be followed, such as cleanly severing the roots and not tearing the root tissues.
- For most of the work in open areas (water/electrical/and pressurized septic lines) hand digging is not required, a trenching machine (i.e., ditch witch) may be used to cut a trench.
- Natural forest topsoils are to be retained to the extent feasible during and post construction using soil stabilization and sedimentation control measures.

Compliance Actions for Mitigation Measure No. 6

6a: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form , the language of this mitigation measure shall be incorporated into a Construction Management Plan and submitted to HCD-Planning for review and approval.

6b: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the Project Biologist shall submit a letter (with photographic evidence) to HCD – Planning for review and approval demonstrating that tree protective measures have been installed in accordance with Arborist Report (HCD-Planning File LIB220345).

Mitigation Measure No. 7 – Redwood Forest Restoration and Landscape Plan

A Redwood Forest Restoration Plan shall be prepared by the Project Biologist. Several areas across Big Sur Campgrounds and Cabins contain dense redwood groves. These groves and associated understory shall be fully restored (approximately 40,407 square feet) and closed off to pedestrian foot traffic through installation of habitat restoration fencing. Native landscaping shall be introduced into areas throughout the Project site where smaller stands of Redwood trees, ornamental landscaping, and exposed soils exist, and additional soils disturbance will occur. A landscape plan shall be developed in coordination with the Redwood Forest Restoration Plan. Finally, the Redwood Forest Restoration Plan shall include preservation of approximately 76,661

square feet of Redwood Forest understory on the hillside to the south of the Project site. The Redwood Forest Restoration Plan shall include, at a minimum, the following actions:

- Remove introduced landscape plantings and eradicate all aggressive invasive species within the restoration areas.
- Establish exotic species control protocols and management tools.
- Establish long-term maintenance program for invasive species control, soil stabilization, and other actions noted in this mitigation measure.
- Identify site specific redwood understory species for planting in appropriate locations (Redwood groves) and micro-habitats.
- Identify site specific native species for planting in appropriate locations (walking paths, enhancement along Big Sur River and campground common spaces) and micro-habitats.
- Identify preservation measures including permanent exclusionary fencing and site specific redwood understory species to be introduced in the proposed preservation area (south of campground area).
- Advise on the need to install temporary irrigation measures.
- Advise on location and placement boardwalks and walking throughout the Project site.
- Establish a monitoring program that includes prescription and protocols to track success of exotic species control, erosion control, and Redwood Forest understory restoration and preservation. Success criteria and adaptive management shall include a goal of at least 85% native species coverage. Quarterly monitoring will be conducted for the first three years followed by biannual monitoring for years four and five. Contingency measures shall be built into the Riparian Restoration Plan if success criteria and native vegetation coverage are not met. Monitoring may be extended as determined by the Project Biologist.
- Removal of all existing attachments to redwood trees, including hose stands, utility hooks, stand pipes, utility connections, and numerous other existing damaging and injurious connection hardware that are rampant throughout the campground.
- Establish conditions for natural species recruitment and protocols for protection of sensitive habitat and special status species.
- Avoid impacts to outlining habitats and improve area as habitat for wildlife by maintaining good land stewardship practices.
- Preparation of a final report summarizing the implemented protective measures, observed and/or impacts species, 5-year monitoring compliance with success criteria, and the need for additional remediation.

Compliance Actions for Mitigation Measure No. 7:

7a: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the Applicant/Owner shall submit a California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) approved Riparian Restoration Plan to HCD-Planning for review and approval.

7b: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the Applicant/Owner shall submit

to HCD-Planning an illustrative Landscape and Restoration Plan for review and approval. Final Landscape and Restoration Plan shall be incorporated into the construction permit plan set.

7c: Prior to final of any State HCD permit, the Project Biologist shall submit written evidence confirming that the eradication efforts have been completed and all initial restoration, preservation, and enhancement (landscaping) actions have been completed.

7d: On a quarterly/biannual basis for 5 years following completion of the restoration, the Project Biologist shall submit a status report to HCD-Planning for review and approval.

7e: At the conclusion of the 5-year monitoring period, the Project Biologist shall submit a final report to HCD-Planning for review and approval documenting the implementation and success of the *Redwood Forest Restoration Plan* and determine whether additional monitoring or remediation measures are required. All recommendations shall be adhered to by the Applicant/Owner on an on-going basis.

Mitigation Measure No. 8 – Campground Management Plan

The Project Biologist shall develop of a comprehensive Campground Management Plan to include on-going prescriptions and protocols for the implementation and resource management of the various elements associated with the parcel including: an Invasive Species Eradication Plan, the Redwood Forest Restoration Plan, Riparian Restoration Plan, Fuel Management and Landscape Maintenance Guidelines. The Campground Management Plan shall also include an educational pamphlet and signage for campground visitors that detail the sensitive biological resources on site (see the General Development Plan's Big Sur Campground Educational Signage Concept Program) and provide guidance on acceptable activities and land stewardship practices. For the health of the tree resources, no further anthropogenic trunk penetrations should be installed and compliance these standards shall be included in the Campground Management Plan. Existing maintenance practices of depositing green waste materials along the east side of the campground on the riverbank shall cease and alternative, improved land stewardship and maintenance practices shall be incorporated into site management; including off-hauling of green waste to a composting facility, utilization of green waste as a mulch material on site, or other strategies that does not impact riparian resources. The Applicant/Owner shall sign this Campground Management Plan confirming intention to implement its contents.

Compliance Actions for Mitigation Measure No. 8:

8a: Prior to final any State HCD permit, the Applicant/Owner shall submit a Campground Management Plan to the HCD-Planning for review and approval that demonstrates implementation of the requirements of this mitigation measure.

8b: Within 1 year of commencement of use, the Applicant/Owner shall submit evidence to HCD-Planning demonstrating installation of property's educational signage.

Mitigation Measure No. 9 – Riparian Restoration Plan

The Project Biologist shall prepare a Riparian Restoration Plan. The Riparian Restoration Plan shall include at a minimum the following actions:

- Remove introduced landscape plantings and eradicate all aggressive invasive species within the restoration areas.
- Establish exotic species control protocols and management tools.
- Establish long-term maintenance program for invasive species control, soil stabilization, and other actions noted during monitoring.
- Identify site specific upland and floodplain species including diverse understory species for planting in appropriate micro-habitat.
- Identify and advise on the need to install temporary irrigation measures.
- Establish a monitoring program that includes prescription and protocols to track success of exotic species control, establishment of native riparian vegetation (including willow revegetation), and riparian habitat restoration. Success criteria and adaptive management shall include a goal of at least 85% native species coverage. Quarterly monitoring will be conducted for the first three years followed by biannual monitoring for years four and five. Contingency measures shall be built into the Riparian Restoration Plan if success criteria and native vegetation coverage are not met. Monitoring may be extended as determined by the Project Biologist.
- Establish conditions for natural species recruitment and protocols for protection of sensitive habitat and special status species.
- Avoid impacts to outlining habitats and improve area as habitat for wildlife by maintaining good land stewardship practices.
- Preparation of a final report summarizing the implemented protective measures, observed and/or impacts species, 5-year monitoring compliance with success criteria, and the need for additional remediation.

Compliance Actions for Mitigation Measure No. 9:

9a: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the Applicant/Owner shall submit a California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) approved Riparian Restoration Plan to HCD-Planning for review and approval.

9b: Prior to final of any State HCD Permit, the Project Biologist shall submit written evidence confirming that the eradication efforts have been completed.

9c: On a quarterly/biannual basis for 5 years following completion of the restoration, the project biologist shall submit a status report to HCD-Planning for review and approval.

9d: At the conclusion of the 5-year monitoring period, the project biologist shall submit a final report to HCD-Planning for review and approval documenting the implementation and success of the *Riparian Restoration Plan* and determine whether additional monitoring or remediation measures are required. All recommendations shall be adhered to by the Applicant/Owner on an on-going basis.

Mitigation Measure No. 10 - Western Bumble Bee and Crotch's Bumble Bee Protection

A pre-construction survey shall be prepared by the Project Biologist during typical flying season (February 1 to October 31) to determine the presence of Western bumble bee (WBB), Crotch's

Bumble Bee (CBB), or potential habitat. If no WBB, CBB, and/or potential WBB or CBB habitat is identified, no further mitigation is required. If WBB, CBB, and/or potential habitat are identified the following actions shall be adhered to. . The Project Biologist shall notify CDFW within 24 hours if Crotch's bumblebee or other special-status bumblebees are detected. If mammal burrows and thatched/bunch grasses are within project grading limits, the Project Biologist shall consult with CDFW to prepare a plan to protect bumble bee nests and individuals to ensure no take of WBB occurs. The Project Biologist shall obtain a CESA ITP from CDFW if impacts to Crotch's bumble bee or Western bumble bee cannot be avoided.

- If project-related ground disturbance occurs during this species' nesting period, a minimum of a 50-foot buffer shall be established around mammal burrows and thatched/bunch grasses. If mammal burrows and thatched/bunch grasses are within project grading limits, the Project Biologist shall consult with CDFW to prepare a plan to protect bumble bee nests and individuals to ensure no take of WBB occurs.
- If project-related ground disturbance occurs during this species' overwintering period of October through February, the Project Biologist shall consult with CDFW to prepare a plan to protect bumble bee nests and individuals to ensure no take of WBB occurs.

Compliance Actions for Mitigation Measure No. 10:

10a: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the applicant/owner shall submit to HCD-Planning for review and approval the results of the WBB and CBB survey. If WBB, CCB, and/or potential habitat are identified, the Project Biologist shall adhere to the language of this condition.

Biological Resources (d and e) Less than Significant Impact with Mitigation: The Proposed Project would not have a substantial adverse effect on any native resident or migratory fish or wildlife species. Based on the results of the biological assessment prepared for the Project, the Project site is not located in an established migratory wildlife corridor and would not impede the use of native wildlife nurseries. Therefore, implementation of the Project would not result in impacts to wildlife movement corridors or native wildlife nurseries and no mitigation is required. The Project site is developed and disturbed. While the Project Biologist did not observe suitable habitat for CRLF or other special status amphibian or mammal species within the Project vicinity, construction activities could potentially impact migrating individuals. As a result, mitigation measures have been incorporated to ensure that potential impacts would be avoided and reduced to a less than significant level (**Mitigation Measure Nos. 2, 3, and 10**).

Biological Resources (e) and (f) Less than Significant Impact with Mitigation

The Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The Proposed Project would not require the removal of any native trees, nor would the Project require the removal of natural community vegetation. As discussed previously, the Proposed Project site is extensively disturbed, and void of native habitat within the areas proposed for construction and operation. Construction and

operation of the Proposed Project would consist of the demolition of existing campground common spaces, and the construction of new common spaces and improvements to the onsite utilities. Construction and operation would occur substantially within the existing campground footprint (i.e., previously disturbed and built). Additionally, the Proposed Project would be required to comply with all the recommendations regarding tree protection identified by both Fred Ballerini and Ono Consulting to ensure impacts to trees and root systems remains less than significant. Applicable tree protection measures include minimizing the root disturbance to 30% of the root zone for each individual tree, limiting terrain alteration and avoiding trenching near or around important trees, utilizing permeable surfaces, and utilizing protective fencing before construction to negate or minimize root damage by soil compaction or trunk damage. Adhering to tree protection measures of Fred Ballerini and Ono Consulting will minimize impacts to Redwood tree roots and prevent damage to Redwood tree trunks as required by Big Sur Coast LUP Policy 3.3.3.A.8, which requires minimizing and/or avoiding impacts to Redwood trees. Additionally, because the Proposed Project's potential impacts are isolated and limited to the improvements themselves, the Project complies with Big Sur Coast LUP Policy 3.3.2.4. Implementation of **Mitigation Measure Nos. 3, 4, 6, 7,** and **8** would ensure long term maintenance and health of the redwood trees and reduce impacts to a level of less than significant.

Similarly, the Project site is not included in any local, regional, or state habitat conservation plan and therefore the Proposed Project would not conflict with the provisions of an adopted habitat conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans. Development on or within the vicinity of the Project site is governed by several documents including the 1982 General Plan, Big Sur Coast LUP and CIP, the Big Sur River Protected Waterway Management Plan, and the Big Sur River Watershed Management Plan. Each plan identifies Redwood Forests and the Big Sur River as ESHA. As discussed above, the Project Site contains both Redwood Forest and riparian habitat associated with the Big Sur River. While designated as ESHA, the Project site is extensively disturbed and void of native habitat within the developed/disturbed areas of the site proposed for construction and operation. The Proposed Project would result in net benefits to these environments as construction would move infrastructure away from sensitive areas (i.e., riverbanks, redwood trees) and restore the site through restoration and invasive species eradication efforts. Implementation of **Mitigation Measures Nos. 1 through 10** would ensure temporary impacts during construction are minimized and that protection, restoration, and management plans are established and adequately implemented to minimize operational impacts. Implementation of these measures would ensure impacts remain less than significant.

5. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (sources:1,19,22,23,25,31)	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (sources: 1,19,22,23,25,31,32,33)	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries? (sources: 1,19,22,23,25,31)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Achasta Archaeological Services ("Achasta") prepared a report titled *Phase I and Phase II Preliminary Archaeological Assessment of the Big Sur Campground* in May 2022 (Monterey County Library No. LIB220346; Source 1). The report presents the results of the archaeological records searches, results of the Phase I and Phase II evaluations, and recommendations. In addition to the cultural resources report, Margaret Clovis M.A. prepared a historical evaluation (Source: 19) for the Proposed Project. The following discussion is supported by both reports.

Cultural Resources (a) No Impact: CEQA Guidelines Sec. 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 of Historical Resources. Public Resources Code 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. The Proposed Project consists of the demolition of campground common spaces and other structures that were originally constructed as early as 1954, but subsequently modified over the years. Margaret Clovis evaluated the structures planned for demolition to determine their historic significance and found that while the Big Sur Campground and Cabins site has played a role in Big Sur's tourism history, the facility has not been the sole provider of visitor serving accommodations. There is no evidence that the Big Sur Campground and Cabins site is associated with important events that have contributed to the broad patterns of Big Sur history. Furthermore, the Project site is not associated with a person who is significant on the local, state, or national level. Lastly, the evaluation found that permanent buildings in the Project site are modest and the construction, design, and placement on the property do not reveal any deliberate attempt to blend them with each other or the environment. No distinctive characteristics of campground architecture, or artistic value are present. For these reasons, the Proposed Project site does not meet the criteria of any historical registers. No Impact would occur.

Cultural Resources (b) Less than Significant Impact: Public Resources Code Section 21083.2 requires that lead agencies evaluate potential impacts to archaeological resources and determine

whether a project may have a significant effect or cause a substantial adverse change in the significance of an archaeological resource. A Sacred Lands File request was made in November 2021, the results of which were negative. A records search through the California Historic Resources Information System's Northwest Information Center found no resources within the Proposed Project site. The records search, however, identified one (1) resource located within 750 feet of the Project area. The identified resource is the Carmel-San Simeon Highway Historic District (also known as the Big Sur Coast Highway – 100-mile segment of Highway 1 between Carmel and San Simeon). A section of Highway 1 runs parallel to the Project site but is separated by the Big Sur River. The Proposed Project would have no impact on Highway 1, or its Historic District as the Project site already serves as a campground and no intensification is proposed. Additionally, a Phase I Preliminary archaeological assessment for the Proposed Project was conducted in November 2021, which yielded no resources. A Phase II Subsurface Evaluation was completed in December 2022 and similarly yielded negative results. The augering program conducted with the Phase II Subsurface Evaluation consistently found silty sand conditions in all bore holes (up to 3 feet deep). The report notes that depths of the augering program were limited due to the extensive existing hardscape, bedrock soils, and tree roots obstructions. Based on the prepared Geotechnical Report, soil conditions from 3 feet to 50 feet deep also consisted of course grained and fine-grained sand, fine silt, granitic gravel (originating from granite), and sandstone. No historic or prehistoric site indicators were observed in the extracted soils. Although the Proposed Project site is previously disturbed in connection to existing use as a campground, construction activities could potentially impact previously unknown or buried archaeological resources. The possibility of disturbing previously unknown archaeological resources represents a potentially significant impact that would be minimized with implementation of Monterey County Condition of Approval PD003(A). Monterey County Condition of Approval PD003(A) requires work halt immediately in the event a cultural, archaeological, historical, or paleontological resource is uncovered during construction to ensure potential impacts related to the inadvertent discovery of a previously unknown resource would be less than significant.

Cultural Resources (c) Less than Significant Impact: No human remains, including those interred outside of a formal cemetery, are known to occur on the Project site. The Proposed Project would occur on a previously developed site that was extensively disturbed in connection with the construction of the existing campground. As a result, finding human remains during construction would be unlikely. Nevertheless, while unlikely, the Proposed Project could impact previously unknown human remains. The implementation of a standard Monterey County Condition of Approval requiring that work halt in the event of the discovery of any human remains would ensure less than significant impacts. This condition further requires that no excavation or ground-disturbing activities shall occur at the site or nearby area until the Monterey County coroner has been contacted in accordance with §7050.5 of the California Health and Safety Code. If the coroner determines that the human remains are of Native American origin, the appropriate Native American tribe shall be contacted to provide recommendations for the disposition of the remains. Work will not resume in the immediate area of the discovery until such time as the remains have been appropriately removed from the site. For these reasons, the this represents a less than significant impact.

6. ENERGY 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? (sources:15,18)	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (sources:15,18)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Pacific Gas & Electric ("PG&E") is the primary electric and natural gas service provider in Monterey County. In 2018, all PG&E customers within Monterey County were enrolled in Central Coast Community Energy ("3CE"), formally known as Monterey Bay Community Power. 3CE is a locally controlled public agency providing carbon-free electricity to residents and businesses. 3CE works through PG&E who provides billing, power transmission and distribution, grid maintenance service, and natural gas to customers.

Energy (a) and (b) Less than Significant Impact: The Proposed Project would not result in a potentially significant environmental effect due to the wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during construction or operation. The construction of the Proposed Project would require energy for the procurement and transportation of materials, and preparation of the site (e.g., minor grading, materials hauling). Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these activities. The construction energy use has not been quantified. However, the construction would not cause inefficient, wasteful, or unnecessary consumption of energy because 1) the construction schedule and process is designed to be efficient to avoid excess monetary costs, and 2) energy use required to complete construction would be temporary in nature.

Operation of the Proposed Project would not result in a significant increase in energy beyond existing energy demand associated with the Big Sur Campground and Cabin site. Moreover, construction of the Proposed Project would be required to comply with the current California Building Code, which include energy efficiency standards (Title 24, Part 6). Additionally, the Project would be required to comply with the California Green Building Standards Code ("CalGreen"), which establishes mandatory green building standards for all buildings in California. For these reasons, this represents a less than significant impact.

7. GEOLOGY AND SOILS **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? (sources:12,15,18,22,23,26,27,29,32,33,37) Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking? (sources: 12,15,18,22,23,26,27,29,32,33,37)	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction? (sources: 12,15,18,22,23,26,27,29,32,33,37)	☐	☐	☒	☐
iv) Landslides? (sources12,15,18,22,23,26,27,29,32,33,37)	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil? (sources12,15,18,22,23,26,27,29,32,33,37)	☐	☐	☒	☐
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? (sources: 12,15,18,22,23,26,27,29,32,33,37)	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Chapter 18B of the Uniform Building Code (1994), creating substantial risks to life or property? (sources: 12,15,18,22,23,26,27,29,32,33,37)	☐	☐	☒	☐
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? 12,15,18,22,23,26,27,29,32,33,37	☐	☐	☐	☒
f) Directly or indirectly destroy a paleontological resource or site or unique geologic feature? (Source: 12,15,18,22,23 31)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Soil Surveys Group, INC. ("SSG") prepared two geotechnical reports dated August 2022 and February 2023 (Monterey County Library No. LIB230175; Source: 32 and 33). SSG conducted a field investigation and collected eight (8) soil borings on May 17, 2021, and four (4) soil borings on January 31, 2022. Of the 12 soil borings, five (5) were prepared for groundwater monitoring and seven (7) for percolation investigations. The soil borings were evaluated to determine near surface and subsurface soil conditions and suitability for the construction of the Proposed Project. SSG conducted additional soil borings in November 2022. In addition to the geotechnical investigation, Craig S. Harwood prepared a geologic feasibility evaluation for the Proposed Project in January 2023 (Monterey County Library No. LIB230311, Source: 12). The following discussion is based on the findings of those evaluations.

Seismicity and Fault Zones
The geologic structure of central California is primarily a result of tectonic events during the past 30 million years. Faults in the area are believed to be a result of movements along the Pacific and North American tectonic plate boundaries. The movements along these plates are northwest-trending and largely comprised of the San Andreas Fault system. Monterey's complex geology is a result of changes in sea level and tectonic uplifting. Geologic units in the region have been displaced by faulting and folding. The Granitic basement and overlying tertiary deposits have been juxtaposed along many of the northwest/southeast-trending faults.

The Project is located at 47000 Highway 1 in Big Sur, California, in the northern portion of the Santa Lucia Mountains. The topography of the Project site is relatively flat. Where the Project site nears the riverbank to the east or abuts the hillside to the west, the topography becomes terraced with moderate to steep slopes. The most active fault nearest to the Project is the San Andreas fault located approximately 40 miles northeast. Less reliable rupture faults (i.e., less active and with lesser intensity) near the Project include the Monterey Bay-Tularcitos fault located 13.9 miles to the northeast, the Reliz Fault located 22.3 miles northeast, the Calaveras Fault located 42 miles northeast, the Zayante-Vergeles fault system located 39 miles northeast, and the Quien Sabe Fault located 48 miles northeast. Additional and lesser faults are located within the coastal zone. Typical geotechnical hazards include seismic shaking, ground surface fault rupture liquification, lateral spreading, land sliding, and soil expansion. The Project is in a seismically active region with mapped faults that have the potential to generate earthquakes that could significantly affect the Project.

Soils
The Natural Resources Conservation Service ("NRCS") characterizes soils within the Project site as mostly *Tujunga, Corducci, and Gamboa,* typical soil types found in alluvial fans, floodplains, and mountain backslopes. The typical profile is coarse sand and loamy sand, sometimes consisting of a gravelly texture. These soils are typically found on partially dissected terraces of slopes at elevations of 20 to 800 feet. These soils are typically associated with climate that is dry with cool rainless foggy summers and cool moist winters. Drainage and/or permeability of these soil types

are characterized as "somewhat poorly to poorly drained" and have "slow to medium runoff" and moderate erosion (Source: 29).

Geology and Soils Impact (a.i) No Impact: The Proposed Project is not located within any of the Alquist-Priolo Earthquake Fault Zones established by the Alquist-Priolo Earthquake Fault Zone Act of 1972. No impact would occur.

Geology and Soils (a.ii) Less than Significant Impact: While the Proposed Project is not located in an Alquist-Priolo Earthquake Fault Zone, the Project site is located within a region that is seismically active. Due to the proximity of the Proposed Project to active and potentially active faults, there is the potential for strong seismic shaking at the site during the Proposed Project's design lifetime. While the Proposed Project could be exposed to seismically induced hazards, the Proposed Project would be required to comply with California Building Code seismic design standards. In addition, the final design of the Proposed Project would be required to comply with the recommendations of a design-level geotechnical investigation. As a result, potential impacts due to seismic hazards would be minimized. Therefore, the Project would not result in a significant impact.

Geology and Soils (a.iii -iv) Less than Significant Impact: The Project site is located in an area of high landslide susceptibility. Craig Harwood found that a large-scale landslide on the westerly slope extending into the Proposed Project site had occurred in the geologic past, but the slide has remained dormant and no reactivation as a result of seismic events has occurred. To ensure landslide potential remains less than significant, a design-level geotechnical analysis would be required. The design-level geotechnical analysis would include a slope stability analysis consistent with the recommendations from the geotechnical report. Moreover, the Proposed Project would be required to comply with the recommendations of a design-level geotechnical analysis. Seismic-related ground failure including liquification was also determined to be low. SSG evaluated liquification and lateral spreading and determined in the event of seismic shaking 0.5 inches to 6.5 inches of vertical settlement and 0.5 inches to 37 inches of lateral spread towards the riverbank could occur. To ensure impacts because of seismic shaking remain less than significant, SSG provided recommendations to minimize impacts on proposed buildings. All recommendations of the geotechnical and geological report are required to be implemented into the final construction plans pursuant to Monterey County Code section 16.080.110. Furthermore, while located in a seismically active region, the Project Geologist provided the opinion that the potential for a large scale or moderate scale seismic event, that would induce landslides or liquification is low. For these reasons, this represents a less than significant impact.

Geology and Soils (b) Less than Significant Impact: The Proposed Project is located in an area identified as having low to high erosion. Grading and excavation could result in localized erosion onsite. However, the Proposed Project would implement standard construction BMPs intended to minimize potential erosion-related effects and would also be required to implement standard erosion control measures during construction. Similarly, the Proposed Project would be required to implement the recommendations of a design-level geotechnical analysis to further ensure erosion impacts would be minimized. Finally, the Proposed Project would also be required to comply with the requirements of MCC Chapter 16.08 and 16.12. The implementation of standard

construction BMPS, in addition to adhering to applicable MCC requirements, would ensure that impacts would be minimized. Therefore, the Proposed Project would not result in a significant impact.

Geology and Soils (c) and (d) Less than Significant Impact: The Proposed Project would not be located on a geologic unit or soil that is unstable, or that would become unstable because of the Project or that would result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or be located on expansive spoil creating a direct or indirect risk to life or property. The Proposed Project, as designed and located, would comply with applicable policies of the BSC LUP Chapter 3.7 – Hazardous Areas. Also, the geotechnical report prepared for the project demonstrates that the site would be stable for development. Specifically, the project is consistent with BSC LUP Policy 3.7.2.3, which directs that new development shall be sited and designed to minimize risk from geologic, flood, or fire hazards. Policy 3.7.3 further requires that structures be designed to resist earthquakes and be sited and designed to minimize grading and other site preparation activities. Consistent with LUP Policy 3.7.3.A.9, the prepared geotechnical and geological reports demonstrate that the site would be stable for development. The Project Geologist notes that final grading or alterations of the natural slope should be reviewed by the engineering geologist and geotechnical engineer to determine how the proposed changes would be affected by geologic processes. While the potential for debris flow on natural slopes in the Project area is low, moderate potential for localized debris flow (i.e., landslides) at the northwest and southeast ends of the Project site are moderate. Similarly, where soil conditions were observed to be loose and expansive, SSG determined that with incorporation of the design recommendations and compliance with Standard California Building Codes, the site would remain suitable for construction of the Proposed Project. All recommendations of the geotechnical and geological report are required to be implemented into the final construction plans pursuant to Monterey County Code section 16.080.110 and therefore adherence to this requirement would reduce impacts to a level of less than significant.

Geology and Soils (e) No Impact: The Project site is served by an existing wastewater system that would be replaced as part of the Proposed Project. SSG completed percolation testing and determined that onsite soils have acceptable percolation rates for the proposed wastewater system improvements. Furthermore, the wastewater system would be constructed in an area that is located at a minimum of 100 feet away from the riverbank. Therefore, the Proposed Project would not result in an adverse impact related to soils onsite soils being incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems and would have no impact.

Geology and Soils (f) No Impact: 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, geomorphic evolution, paleoclimatology, and the relationships of aquatic and terrestrial species. Most of the

fossils found in Monterey County are of marine life forms and form a record of the region's geologic history of advancing and retreating sea levels. A review of nearly 700 known fossil localities within the County was conducted by paleontologist in 2001; 12 fossil sites were identified as having outstanding scientific value. The Project site is not located on or near any of those sites. No impact would occur.

8. GREENHOUSE GAS EMISSIONS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Source:15,18)	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Source15,18)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Various gases in the earth's atmosphere, when exceeding the naturally occurring or 'background' levels due to human activity, create a warming or greenhouse effect, and are classified as atmospheric greenhouse gases ("GHGs"). Among the prominent GHGs contributing to the greenhouse effect, or climate change, are carbon dioxide ("CO_2"), methane ("CH_4"), ozone ("O_3"), water vapor, nitrous oxide ("N_2O"), and chlorofluorocarbons ("CFCs"). Human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for the greenhouse effect. In California, the transportation sector is the largest emitter of GHGs.

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"]). SMAQMD adopted an updated threshold based on the 2030 target year in April 2020. According to SMAQMD, a Project would result in a significant GHG related impact if the Project would emit more than 1,100 metric tons of Carbon Dioxide equivalent-CO_2e ("MTOCO$_2$e") per year. Operation of a stationary source project would not have a significant GHG impact if the Project emits less than 10,000 MTOCO$_2$e.

Greenhouse Gas Emissions (a) Less than Significant Impact: The Proposed Project is in the NCCAB, where air quality is regulated by MBARD. As discussed above, if a project emits less than 1,100 MTOCO$_2$e per year, its GHG emissions impact would be less than significant. The Proposed Project would generate temporary construction related GHG emissions during demolition of the existing campground common spaces and the construction of new campground common spaces and improvements to the onsite utilities. Therefore, the Project would result in a temporary rise in GHG emissions during the construction phase with a reduction in emissions during operational use, and the effects of such an increase would be minimal.

Operation of the Proposed Project would not generate GHG emissions beyond existing levels as the Project would not increase the use of the site beyond existing levels. Additionally, the Proposed Project would also be required to comply with current building code requirements and includes energy efficient improvements which would further ensure that potential operational energy demand would be minimized. As discussed in **Section VI. 17 Transportation**, the Proposed Project would not result in an increase in operational traffic trips and would not increase overall visitor serving accommodations. As a result, the Proposed Project would not substantially increase GHG emissions beyond existing levels associated with current use. For these reasons, the Project represents a less than significant impact.

Greenhouse Gas Emissions (b) Less than Significant Impact: As described above, the Project is not expected to generate GHG emissions that would exceed applicable thresholds. Therefore, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, the Project represents a less than significant impact.

9. HAZARDS AND HAZARDOUS MATERIALS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (sources:9,13,15,18,22,23,24)	☐	☐	☒	☐
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? (sources: 9,13,15,18,22,23,24)	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (sources: 9,13,15,18,22,23,24)	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (sources: 9,13,15,18,22,23,24)	☐	☐	☐	☒

9. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (sources: 9,13,15,18,22,23,24)	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (sources: 3,9,13,15,18,22,23,24)	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (sources:3, 9,13,15,18,22,23,24)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that may 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.

The Hazardous Waste and Substances Site ("Cortese") List is a planning tool used by the state, local agencies, and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. California Government Code Section 65962.5 requires the California EPA ("CalEPA") to develop at least annually an updated Cortese List. Various state and local government agencies are required to track and document hazardous material release information for the Cortese List. There are no hazardous materials release sites in the vicinity of the Project site. Similarly, according to the California Department of Toxic Substances Control's ("DTSC") EnviroStor database, there are no contaminated sites within the vicinity of the Project.

Hazards and Hazardous Materials (a) Less than Significant Impact: The Proposed Project would entail the use of hazardous materials (e.g., fuel, cleaning materials, etc.) during construction and operation. The types and amounts of hazardous materials used would vary according to the type of activity. It is unlikely that construction of the Proposed Project would create a significant impact due to the routine transport, use, or disposal of hazardous materials in part due to the size

of the Project and the temporary nature of construction. Hazardous materials would be handled and stored in compliance with all local, state, and federal regulations pertaining to hazardous materials.

Operation of the Proposed Project would entail the use of hazardous materials. Hazardous materials would be handled and stored in compliance with all local, state, and federal regulations pertaining to hazardous materials. Furthermore, any hazardous materials would be limited in quantity and concentrations set forth by the manufacture and/or applicable regulations. Therefore, Proposed Project represents a less than significant impact.

Hazards and Hazardous Materials (b) Less than Significant Impact with Mitigation: The Proposed Project includes demolition of existing campground common spaces and associated infrastructure. The existing structures proposed for demolition were originally constructed in the 1950s. Prior to the enactment of federal regulations limiting their use in the late 1970s, asbestos containing materials ("ACM") and/or lead-based paint ("LBP") were often used in construction. ACMs are mineral fibers that were historically added to various materials to strengthen them and to provide heat insulation and fire resistance. If disturbed, ACM may release asbestos fibers that can be inhaled into the lungs. Breathing high levels of asbestos can lead to increased risk of lung cancer, including mesothelioma and asbestosis. ACMs that would crumble easily if handled, or that have been sawed, scraped, or sanded into powder, are more likely to create a health hazard. ACM is most commonly found in insulation, roofing, siding shingles made of asbestos cement, and textured paints. Lead is a highly toxic metal that was used for many years in products found in and around our homes. Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. The primary source of lead exposure is deteriorating LBP. Lead dust can form when LBP is dry scraped, dry sanded, or heated. Dust also forms when painted surfaces bump or rub together. Lead-based paint that is in good condition is usually not a hazard.

While modifications to the structures have occurred since first being constructed, due to the age they could potentially contain ACM and/or LBP. Demolition of these structures could release ACM or LBP. This may pose a potential health risk to people if these materials are not properly handled and disposed of. This potentially significant impact would be reduced to a less than significant level through the implementation of **Mitigation Measures Nos. 11** and **12** below.

Mitigation Measure No. 11 - Asbestos Survey

Prior to demolition activities, the existing campground common spaces and infrastructure shall be sampled as part of an asbestos survey in compliance with the National Emission Standards for Hazardous Air Pollutants ("NESHAP"). If asbestos is found, asbestos-related work, including demolition, involving 100 square feet or more of asbestos containing materials ("ACMs") shall be performed by a licensed asbestos abatement contractor under the supervision of a certified asbestos consultant and asbestos shall be removed and disposed of in compliance with applicable State laws. Regardless of whether asbestos is identified, prior to demolition the Air Pollution Control District ("APCD") shall be notified and an APCD Notification of Demolition and Renovation Checklist shall be submitted to both APCD and the HCD– Planning. Prior to demolition, the

applicant shall retain a qualified asbestos abatement contractor to conduct an asbestos survey and remove any asbestos in compliance with applicable state laws.

> **Compliance Actions for Mitigation Measure No. 11**
> **11a:** Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the Applicant/Owner shall retain a qualified asbestos abatement contractor to conduct an asbestos survey and remove any asbestos in compliance with applicable regulatory requirements. The Applicant/Owner shall submit the results of the asbestos survey to HCD – Planning for review and approval.

Mitigation Measure No. 12 - Demolition Inspection
If, during demolition of any portion of the existing structures, paint is separated from the building material (e.g., chemically, or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed of in accordance with local, state, and federal regulations. According to the Department of Toxic Substances Control ("DTSC"), if paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator shall be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any such requirements. Should paint be separated from building materials during demolition, the applicant shall retain a qualified hazardous materials inspector to determine its proper management.

> **Compliance Actions for Mitigation Measure No. 12**
> **12a**: In the event that paint should be separated from building materials during demolition, the Applicant/Owner shall retain a qualified hazardous materials inspector to survey the paint waste to determine whether it constitute a hazardous material (i.e., LBP) and identify the appropriate disposal method for the material. The Applicant/Owner shall submit the results of the hazardous waste survey to HCD –Planning for review and approval.

Hazard and Hazardous Materials (c) No Impact: The Proposed Project is located within the existing Big Sur Campground and Cabin site. The Proposed Project would not result in emissions of hazardous materials, or the handling of hazardous materials exceeding what currently occurs on site. The Proposed Project consists of the demolition of existing campground common spaces, and the construction of new campground common spaces and improvements to the onsite utilities. The Project site is not located within a quarter mile of a school. Therefore, no impact would occur.

Hazard and Hazardous Materials (d) No Impact: The Proposed Project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Department of Toxic Substances Control, 2023). No impact would occur.

Hazard and Hazardous Materials (e) No Impact: The Proposed Project is not located within an airport land use plan or within two miles of an airport. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the project area.

Hazard and Hazardous Materials (f) Less than Significant Impact: The Proposed Project would not interfere with or impair the implementation of any emergency response plans or evacuation plans. The *2021 Monterey County Operational Area Evacuation and Transportation Plan* identifies Highway 1, Highway 101, or Nacimiento-Fergusson Road to be the nearest designated evacuation routes. The Proposed Project would result in temporary construction-related traffic, but these effects would be limited in duration and would not physically impair and/or otherwise interfere with the implementation of an existing emergency response plan or evacuation plan. Moreover, the Proposed Project would not increase existing operational traffic beyond current levels associated with existing campground operations. A detailed discussion regarding traffic is provided in **Section VI. 17 Transportation**. Therefore, the Project would not interfere with emergency response plans or evacuation plans. For these reasons, the Proposed Project represents a less than significant impact.

Hazard and Hazardous Materials (g) Less than Significant Impact: The Proposed Project is located in an area of moderate to high wildfire risk. Due to the developed nature of the site, continuous fire management, fuel reduction efforts, and implementation of fuel management recommendations presented in the Fuel Management Plan prepared by Ono Consulting, the Project would have a less than significant impact. Please refer to **Section VI.20 Wildfire** for more information.

10. HYDROLOGY AND WATER QUALITY **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (sources:2,5,15,18,22,23,28,34,35,36,37)	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (sources: 2,5,15,18,22,23,28,34,35,36,37))	☐	☐	☒	☐
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? (sources: 2,5,15,18,22,23,28,34,35,36,37))	☐	☐	☒	☐

10. HYDROLOGY AND WATER QUALITY **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? 2,5,15,18,22,23,28,34,35,36,37)	☐	☐	☒	☐
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? (sources: 2,5,15,18,22,23,28,34,35,36,37))	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? 2,5,15,18,22,23,28,34,35,36,37)	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (sources: 2,5,15,18,22,23,28,34,35,36,37))	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Balance Hydrologics, Inc prepared a hydraulic modeling and base flood elevation evaluation for the Proposed Project in October 2021 (Monterey County Library No. LIB220349; Source: 2). Drainage within the Project site was evaluated by Whitson Engineers in September 2022, who prepared a Preliminary Drainage Strategy Narrative). Biohabitats prepared a Conceptual Wastewater Management Plan (Source: 5). The following discussion references the findings of all three technical reports.

The Proposed Project is located within the Big Sur River Watershed in the Lower Big Sur River Basin. The Big Sur River enters its lower basin through the Big Sur Gorge located southeast of the Project site and flows northerly through the Big Sur Valley before emptying into the Pacific Ocean. Water resources in the Lower Big Sur River Basin include individual and small community water systems that serve residences, stores, and campgrounds along Big Sur River. The topography of the Project site is mostly level, with moderate to steep slopes near the riverbanks and hillsides.

Hydrology and Water Quality (a) and (c) Less than Significant Impact: The Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Construction would result in ground disturbing activities as a result of demolition, excavation, and grading. Ground-disturbing activities and vegetation removal could generate temporary soil erosion and could potentially affect existing water quality. To minimize construction generated water quality impacts the contractor/engineer would implement standard construction BMPs. Moreover, the Proposed

Project would be required to comply with the requirements of Monterey County Code Chapter 16.08, which would ensure that temporary construction-related water quality impact would be minimized. Monterey County Conditions would also require implementation of the Proposed Project include submittal of a Grading Plan and a Stormwater Pollution Prevention Plan, or a letter of exemption from the Central Regional Water Quality Control Board. The Geotechnical Investigation also included recommendations to minimize erosion and surface drainage that would be implemented by the Proposed Project. For these reasons, the temporary construction-related impacts associated with the Proposed Project would be less than significant.

As discussed in the memorandum prepared by Whitson Engineers, titled *Preliminary Drainage Strategy Narrative,* dated September 26, 2022 (Source: 37), the total amount of impervious surface at the Project site would be reduced by 10-15%, and where possible, shallow detention ponds would be positioned around the Project site and away from sensitive environments (e.g., Big Sur River and Coast Redwoods). Roads and other hardscapes would be constructed or improved to direct stormwater to the detention ponds, and roofs would be constructed to include rain chains and infiltration pots. These improvements would ensure that impacts would be less than significant. In addition, the final design of the Proposed Project would be required to comply with the recommendations of a design-level drainage report.

Additionally, while the existing wastewater system poses threats to surface and groundwater quality, the Proposed Project would remove the existing system and subsequently construct a new wastewater system that would significantly improve water quality. To ensure water quality is consistently maintained, the Project would be required to comply with the County's non-standard Conditions of Approval EHSP04 – Cumulative Impact Analysis, EHSP02 – Effluent Monitoring, and EHSP01 – Wastewater Discharge Requirements. All three (3) non-standard Conditions of Approval would ensure groundwater quality meet the standards established by the Monterey County Local Agency Management Program for Onsite Wastewater Treatment System ("LAMP"), Monterey County Code, and the Regional and State Water Quality Control Board. Therefore, the Proposed Project represents a less than significant impact.

Hydrology and Water Quality (b) Less than Significant Impact: The Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Temporary water use would occur during Project construction in connection with dust suppression activities. Construction water use would be minimal and would not interfere with the process of groundwater recharge. The Proposed Project would utilize the existing water supply system which is supplied by an onsite well. Utility Services prepared a technical memorandum that summarized the daily production of the well which equates to 18,288 gallons per day (Source: 34). Whitson Engineers calculated the existing peak daily demand of the Proposed Project site was approximately 14,331 gallons per day (Source: 35). The existing peak daily demand was calculated based on a 10-year average peak monthly demand of 296,168 gallons during the month of July. July was determined to be the historic peak water use month every year of the 10-years that were evaluated. The peak daily average was 9,554 gallons per day. Whitson Engineers separately evaluated the estimate peak daily average after construction of the Proposed Project (Source: 36). The Proposed Project would ultimately reduce water use as the Project would incorporate water

conservation measures such as installation of low flow plumbing fixtures. Whitson Engineers calculated peak water demand after construction of the Proposed Project to equate to 4,600 gallons per day. Moreover, the Proposed Project would not increase the use of the site from existing levels. For these reasons, this represents a less than significant impact.

Hydrology and Water Quality (d) Less than Significant Impact: The Project site is not located in an area subject to significant seiche or tsunami effects. However, the Project site is located adjacent to the Big Sur River in a flood zone FEMA designates as Zone A (FEMA, 2023). Balance Hydrologics, Inc ("Balance") prepared a memorandum titled *Big Sur Campground & Cabins – Big Sur River Hydraulic Modeling and Base Flood Elevation Evaluation* (Source: 2) for the Proposed Project site. The evaluation found the reach of the Big Sur River nearest the Project site is characterized by steep, narrow canyons, with high velocities and relatively little floodplain inundation. Hydraulic modeling further illustrated that inundation within the vicinity of the Project site is significantly narrower than the mapped FEMA Zone A boundary. In the event of high precipitation, Balance predicted flooding (100-year inundation floods) would occur in the eastern portion of the Project site impacting campsites that are established near the top of the riverbank. Impacts, however, would remain less than significant for several reasons. the Proposed Project would be consistent with Monterey County Code Chapter 16.16 which establishes standards for RVs placed in FEMA flood zone A. The 14 campsites located the eastern portion the Project site would be designated for RVs. RVs are fully licensed vehicles that are ready for highway use and meet the standard of recreational vehicles (placed on-site for less than 180 consecutive days), as defined in Monterey County Code Chapter 16.16. Additionally, these RVs would be required to meet the elevation and anchoring requirements for manufactured homes in Monterey County Code section 16.16.050.H. As such, campsites would be elevated to 1 foot above the base flood elevation (134 to 136 feet above mean sea level). No permanent foundation is proposed for the RC/campsites and therefore no anchored foundation system would be required to resist flotation, collapse, and lateral movement. No mobile homes, park model units, or manufactured homes, which are defined as a structure, transportable in one or more sections, built on a permanent chassis and designed for use with or without a permanent foundation, would be located within FEMA Zone A. However, where campsites are designed to accommodate longer term and/or more permanent structures (e.g., park model RV) the structures would be removed in advance of flooding or placed on permanent foundations that are anchored consistent with the requirements of Chapter 16.16. Compliance with the County's Condition of Approval Floodplain Notice would require the Applicant to provide a recorded floodplain notice for the subject parcel that notifies visitors that the site may be subject to building and/or land use restrictions. For these reasons, the impacts would be a less than significant impact.

Additionally, Monterey County Code section 16.16.050.K requires a 200 feet setback from top of riverbanks, unless it can be shown that the development will not significantly reduce the capacity of the river by increasing velocity or diverting flow, will be safe from flow related erosion and will not cause flow related hazards. Multiple structures and campsites would be located within 200 feet of the Big Sur Riverbank. However, as described above, the proposed total amount of impervious surface at the Project site would be reduced by 10-15%, thus increase the floodplain capacity. Further, detention ponds would be installed where appropriate. Proposed roads and other hardscapes would direct storm water to these shallow ponds promoting stormwater attenuation and

infiltration where practical. Runoff from roof areas would be collected in gutters and directed to infiltration pits via rain chains, allowing for additional infiltration and attenuation from current conditions. This combination of measures would: 1) attenuate the runoff to below pre-existing conditions, 2) improve storm water quality through infiltration and by slowing the runoff rates, and 3) reduce the potential for erosion runoff into the Big Sur River.

As for the wastewater system, the existing infrastructure is outdated and located within the setback of the riverbank. The age and proximity to the river are inconsistent with local, regional, and state standards. In the event of high precipitation or flooding, operational failure of the existing system could occur. This could reasonably result in surface and groundwater contamination. The Proposed Project would remove the existing wastewater system and construct a new system that would address these issues. Specifically, the Proposed Project would construct a wastewater system that would utilize modern technology to comply with regulations. Additionally, the wastewater system would be constructed outside of the 100-foot setback from the riverbank, outside of the 150-foot setback from drinking wells, and outside the 100-year floodplain. The distance from these resources would ensure that high precipitation or flood event impacts would remain less than significant.

Hydrology and Water Quality Impact (e) No Impact: The Proposed Project would not conflict with or obstruct a water quality control plan or sustainable groundwater management plan. As discussed previously, the Project would connect to existing water supply infrastructure. No impact would occur.

11. LAND USE AND PLANNING **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community? (sources:15,18,22,23)	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (sources: 15,18,22,23)	☐	☒	☐	☐

Discussion/Conclusion/Mitigation:

Big Sur Coast Land Use Plan
The Project lies within the coastal zone and is regulated by the Big Sur Coast LUP, which is the certified LCP for the region. The overall philosophy of the Big Sur Coast LUP is to maintain the scenic beauty, rural character, and cultural traditions of the Big Sur Coast. Basic objectives of the LCP affecting the Project include:

- Ensuring preservation of resources;

- Prohibiting development visible from Highway 1;
- Retaining Highway 1 as a scenic, two-lane road primarily serving recreational traffic; and
- Placing the preservation of natural scenery above the need for development.

The Big Sur Coast LUP identifies the land use category of the Project site as Rural Community Center ("RCC") and "Watershed and Scenic Conservation" ("WSC"). The principal uses in these land use categories include residential and visitor accommodations (e.g., inns, RV campgrounds, rustic campgrounds), agriculture/grazing, ranch houses, ranch buildings, with secondary uses to include rural residential and employee housing.

Big Sur River Protected Waterway Management Plan
The Big Sur River is located directly east of the Proposed Project site and is a supplement to the Big Sur Coast LUP. The Big Sur River Protected Waterway Management Plan contains numerous requirements for public and private entities with property adjacent to the river or within its watershed. Specifically, the plan identifies standards concerning water rights, optimization of water yields within the watershed, leach field locations, and distances of trails and campsites from the edge of the Big Sur River. The plan also mandates clearing debris from the river channel, which could impede water passage during high water periods and the restriction of incompatible development in the floodplain. The plan calls for restoration of native vegetation along the riverbank for ecological and visual reasons and for the use of prescribed burns to reduce fuel loads.

Land Use and Planning (a) No Impact: The division or disruption of an established community would occur if a project created a physical barrier separating, isolating, or dividing a portion of a built community. The physical division of a community is traditionally associated with the construction of large-scale transportation improvements (e.g., highways) or the creation of a large university campus. The Proposed Project consists of the demolition of existing campground common spaces, and the construction of new common spaces and improvements to the onsite utilities. The Project site is zoned as Visitor Serving Commercial and designated as "Rural Community Center/Watershed Scenic Conservation." Development of the Proposed Project is consistent with the existing and surrounding land uses. Due to the nature of the Project and location, the Project would not create a barrier that would divide an established community. Therefore, no impact would occur.

Land Use and Planning (b) Less than Significant Impact with Mitigation: The Project site lies within the coastal zone and is regulated by the Big Sur Coast LUP, which is the certified LCP for the region. The Big Sur Coast LUP identifies the land use category of the Proposed Project site as "Rural Community Center" and "Watershed and Scenic Conservation." The Project site is zoned Visitor Serving Commercial. As discussed above, this land use category primarily supports residences and visitor accommodations, such as rustic campgrounds and RV campgrounds. The Proposed Project consists of the demolition of existing campground common spaces, and the construction of new campground common spaces and improvements to the onsite utilities.

The Big Sur Coast LUP Policy 3.2.4 establishes policies to preserve the visual continuity of the region. More specifically, Big Sur Coast LUP Policies 3.2.4(A.1 – A.8) request that design and

siting of structures not detract from the natural beauty of the undeveloped skylines, ridgelines, and the shoreline; and that visual effects upon public and private views be considered. Consistency with this policy is achieved through siting and design of the development. As discussed in **Section VI.1 Aesthetics**, where existing features are visible from the highway, they are generally small in scale and cohesive with the surrounding environment. As proposed, the project would not substantially alter the appearance of the site from Highway 1 because the redevelopment would be sited in areas which are already development and largely not visible from the Highway. As designed and sited, the Proposed Project would reduce visibility from Highway 1. All other proposed development would be consolidated in areas already developed and currently not visible from Highway 1. The Project would not detract from the natural beauty or negatively affect public or private views.

The Big Sur Coast LUP Policies 3.3.2 ensure ESHA is protected, preserved, and conserved. As discussed in **Section VI.3 Biological Resources**, the Project site is located within, and adjacent to, ESHA (including by not limited to Coast Redwood Forest and the Big Sur River and its associated habitat and species) and is designated as critical habitat for California red-legged frog. The Project Biologist evaluated the site and did not observe any special-status plant or wildlife species within the area proposed for development. Also, it is anticipated that the Proposed Project would impact Coast Redwood tree roots. However, the severity of root impacts would not result in the loss of redwood trees. To ensure long term maintenance of the Project site's Redwood Forest and Riparian Habitat, the Proposed Project also includes restoration activities to further protect, preserve, and conserve ESHA. Implementation of **Mitigation Measure Nos. 1** through **10**, as described in Section VI.4, *Biological Resources*, would ensure compliance with the resource and ESHA protection policies of the Big Sur Coast LUP.

The Bis Sur Coast LUP Policies 3.7.1 – 3.7.2 establish policies pertaining to natural hazards such as earthquakes and wildfire. These policies ensure land use and development are carefully regulated through best available planning practices to minimize risk to life, property, and the natural environment. Consistent with these policies, the Project was evaluated by a geotechnical engineer. As discussed in Section **VI.6 Geology and Soils**, no significant geotechnical hazards associated with the Proposed Project were identified. Moreover, the geotechnical reports determined the site was suitable for development. Similarly, as discussed in **Section VI.3 Biological Resources, Section VI.8 Hazards and Hazardous Materials**, and **Section VI.14 Wildfire**, the Project is located within an area susceptible to wildland fire. Recommendations regarding fire fuel reductions were provided by the Project Biologist and Arborist and would be implemented throughout construction and operation of the Proposed Project.

The Project site's 106-visitor accommodations (82 RV/campsites, 3 A-frames, 4 mobile homes, and 17 park model RVs) either all currently have electricity supplied to each site or can fit a recreational vehicle, and are therefore considered "visitor serving units" pursuant to Table 1 of the Big Sur Coast LUP, and as further described in Big Sur Coast Implementation Plan (CIP) (Chapter 20.145). CIP Section 20.145.140.B.1.c.5 explains that the 300-unit total is applied after certification of the Big Sur Coast Land Use Plan certification. The County of Monterey Assessor's Map provides historical evidence of the subject property as an RV campground with mobile

homes. Book 419 Page 20-9 of the Assessor's Map is titled "BIG SUR CAMPGROUND & CABINS" and illustrates a site plan of the subject property with 106 RV campsite or mobile home sites, identified as rectangular boxes. Based on the prepared Historical Report and Monterey County Building records, the Big Sur Campgrounds and Cabins (106 sites) was established in 1955, prior to certification of the Big Sur Coast LUP in 1986. The Proposed Project does not propose additional visitor serving units and therefore does not require allocation of any additional visitor serving units and is consistent with the unit cap allocation numbers contained in the Big Sur Coast LUP and CIP.

Therefore, impacts related to conflicts with a land use plan would be less than significant with mitigation incorporated.

12. MINERAL RESOURCES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (sources:8,22,23)	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? (sources:8,22,23)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on mineral resources.

13. 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? (sources:15,18,22,23)	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels? (sources: 15,18,22,23)	☐	☐	☒	☐

13. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (sources: 15,18,22,23)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Noise is commonly defined as unwanted sound. Sound levels are usually measured and expressed in decibels ("dB") with zero (0) decibels corresponding roughly to the threshold of hearing. Most sounds consist of a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Most environmental noise includes a conglomeration of noise from distant sources, which creates a relatively steady background noise in which no particular source is identifiable.

The Proposed Project site is located in the community of Big Sur. The Proposed Project consists of the demolition of existing campground common spaces, and the construction of new campground common spaces and improvements to the onsite utilities. The Project site is located directly off Highway 1. The primary source of noise in the Project vicinity would be from vehicle traffic along Highway 1, neighboring residences, and visitor service facilities (e.g., restaurants, campgrounds), and the campground itself. The nearest residences and visitor serving facilities are located approximately 750 feet from the Proposed Project. The Big Sur Coastal Land Use Plan does not include specific policies related to noise but encourages land use to preserve the peace and tranquility of the existing neighbors. In the absence of noise related policies within the Big Sur Coast Land Use Plan, the 1982 Monterey County General Plan policies are applicable.

Noise (a) Less than Significant Impact: Construction of the Proposed Project would generate temporary noise in the project vicinity due to the use of equipment (e.g., trucks, tractors, excavators). The Big Sur Coast LUP does not contain specific policies pertaining to noise, and therefore this analysis relies on noise policies contained in the Monterey County 1982 General Plan. As such, construction activities are required to comply with the Monterey County Noise Ordinance as described in Chapter 10.60 of the Monterey County Code. The ordinance applies to "any machine, mechanism, device, or contrivance" within 2,500 feet of any occupied dwelling unit and limits the noise generated to 85 dBA at a distance of 50 feet from the noise source. Noise generating construction activities are limited to the hours between 7AM. and 7PM. Monday through Saturday. No construction noise is allowed on Sundays or holidays.

While the extent, duration, and volume of noise generated by the construction of the Project has not been quantified, it is unlikely that construction noise would result in a significant impact given

the location of the Project site, proximity of existing sensitive receptors, type of construction, and the temporary nature of construction activities. **Table 13-1 Construction Equipment Noise Emission Levels** identifies typical noise emissions (i.e., levels) generated by construction equipment and how equipment noise reduces with distance.[1]

Table 13-1
Construction Equipment Noise Emission Levels

Equipment	Typical Noise Level (dBA) 50 ft from Source	Typical Noise Level (dBA) 100 ft from Source[1]	Typical Noise Level (dBA) 200 ft from Source[1]	Typical Noise Level (dBA) 400 ft from Source[1]
Air Compressor	81	75	69	63
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: U.S. Department of Transportation, *Transit Noise and Vibration Impact Assessment,* 2006
Construction generated noise levels drop off at a rate of about 6 dBA per doubling of distance between the source and receptor.

As noted, the nearest sensitive receptor is located approximately 750 feet from the Project. Based on the proximity of the nearest receptor and the rate that noise diminishes, construction related activities would not exceed the County's noise related threshold.

Operational noise would not result in a permanent increase in ambient noise. The Proposed Project consists of the demolition of campground common spaces and the construction of new campground common spaces (e.g., café, general store, bathrooms), the use of the site would remain consistent with the existing use. Moreover, the Proposed Project would not result in an increase in visitor serving accommodations. Therefore, use of the site would not change. As discussed in the General Development Plan, the Proposed Project site has established hours of operations, which includes regulated "Quiet Hours." During peak season, "Quiet Hours" are from 10 pm – 7am, and

[1] The rate of noise diminishes as the distance from the source of noise doubles.

during the off-season "Quite Hours" are from 10 pm – 8 am. For these reasons, the Project would have a less than significant impact.

Noise (b) Less than Significant Impact: The Project would not generate excessive ground-borne vibration or ground-borne noise. Construction of the Project would consist of the demolition of existing campground common spaces, and excavation for improvements to utilities (e.g., wastewater system, propane, and electricity). Ground-borne vibration would be generated from these activities but would be temporary in nature. The operation of the Project would not create a new source of vibration. For these reasons, the Proposed Project would have a less than significant impact.

Noise (c) No Impact: The Project is not located within the vicinity of a private airstrip of an airport land use plan, or within two miles of a public airport. For these reasons, no impact would occur.

14. POPULATION AND HOUSING **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (sources:15,22,23)	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (sources15,22,23:)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on population and housing.

15. PUBLIC SERVICES Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (sources:15,22,23)	☐	☐	☐	☒
b) Police protection? (sources: 15,22,23))	☐	☐	☐	☒
c) Schools? (sources: 15,22,23))	☐	☐	☐	☒
d) Parks? 15,22,23)	☐	☐	☐	☒
e) Other public facilities? (sources: 15,22,23))	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on public services.

16. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (sources: 15,22,23))	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? Sources:15,22,23)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on recreational resources.

17. TRANSPORTATION/TRAFFIC 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? (sources:15,16,17,18,22,23,24)	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (sources: 15,16,17,18,22,23,24)	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (sources: 15,16,17,18,22,23,24)	☐	☐	☒	☐
d) Result in inadequate emergency access? (sources: 15,16,17,18,22,23,24)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Keith Higgins conducted a traffic analysis and prepared a memorandum dated September 13, 2022 (Monterey County Library No. LIB220348; Source: 17). The Project Traffic Engineer evaluated transportation related impacts associated with the Big Sur Campground Project, which would consist of the demolition of campground common spaces for the reconstruction of campground common spaces, and improvements to onsite parking, site access, and utilities (e.g., wastewater system). The following discussion is based on the findings of the analysis contained in the prepared traffic report.

Existing Operations

The Proposed Project is located at 4700 Highway 1, Big Sur, California. The Proposed Project site currently includes three (3) cabins, four (4) mobile homes, 17 park model recreational vehicle sites, and 82 RV sites. The Proposed Project site contains 106 overnight visitor-serving accommodations. Construction and operation of the Proposed Project would not change the number of visitor accommodations, rather the Proposed Project, as mentioned above, consists of the demolition of campground common spaces for the construction of new campground common spaces. No changes in the number of RV/campsites would result from implementation of the Proposed Project. Similarly, campground common spaces (e.g., café, general store) would continue to serve campground guests only. At full occupancy, the Project site generates 32 morning peak hour trips and 45 evening peak hour trips.

Significance Criteria - Vehicle Miles Traveled

Senate Bill (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 Vehicle Miles Traveled ("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.

Driveway Traffic Operation and Safety
In addition to evaluating the traffic and VMT, the Project Traffic Engineer also evaluated the safety of access to and from the Project site. The site is accessible by a single driveway on Highway 1. The driveway includes a second driveway that provides access to the 2,100 square-foot Big Sur Health Centers and Santa Lucia Campground and Chapel. These facilities are estimated to generate approximately 22 morning peak hour and 17 evening peak hour trips. The combined access carries a total of approximately 54 morning peak hour trips and 62 evening peak hour trips.[2] The Project Traffic Engineer and HCD-Development Services found the existing level of service at the Highway 1/Project driveway intersection are acceptable and traffic control improvements are not required.

The Project Traffic Engineering similarly evaluated the sight distance for exiting the existing access driveway. Keith Higgins notes the vehicles traveling northbound travel at an average speed of 45 miles per hour ("mph"). Sight distance looking south is limited by a redwood tree located approximately 20 feet to the south of the driveway, but from a distance of 15 feet from the edge of Highway 1, sight distance of 360 feet is provided. The sight distance looking north is approximately 460 feet, with vehicles traveling southbound at approximately 52 mph. No vehicle collisions have occurred within 500 feet of the driveway in the last 10 years.

Transportation (a) and (b) Less than Significant Impact: The Proposed Project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadways, and bicycle and pedestrian facilities, or be inconsistent with CEQA guidelines Section 15064.3(b). The Proposed Project would result in temporary construction-related traffic. There would be no increase in operational traffic due to the Proposed Project.

The Proposed Project consists of the demolition of existing campground common spaces, and the construction of new campground common spaces and improvements to the onsite utilities. Construction would require 10 – 100 workers onsite at any given time during the duration of construction. Due to the temporary nature of construction, this would not result in a significant impact. Moreover, construction hours would be from 7 AM – 7 PM.

The Proposed Project would not result in any increase in operational traffic such that there would be an increase in VMT. For the purposes of this IS/MND, the Proposed Project would result in a significant traffic-related effect if the Project would exceed 110 daily trips. As noted previously, the Proposed Project would replace existing campground common spaces, and would not result in

[2] Keith Higgins generated peak hour trips using the Institute of Transportation Engineers ("ITE"), Trip Generation Manual, 11th Edition, 2021.

changes to the visitor service accommodations (i.e., no increase in the number of campsites would occur). Moreover, no changes to the use of the Project site would occur. Furthermore, the Project Traffic Engineer identified that existing traffic trips associated with current operations are below 110 daily trips; and the Proposed Project would not generate any additional traffic tips beyond those associated with existing operations. Therefore, the Proposed Project would not result in a significant VMT-related impact. For these reasons, the Project represents a less than significant impact.

Transportation (c) Less than Significant Impact: The Proposed Project would not substantially increase hazards due to the geometric design features or incompatible uses. The Proposed Project would not be changing existing circulation systems, roadways, or bicycle and pedestrian facilities in a way that would generate hazards. As discussed above, the prepare traffic report evaluated the intersection of Highway 1 and the access driveway to the Project site. Based on the number of vehicles entering and exiting the driveway, the speed at which vehicles travel along Highway 1 at the intersection, and the sight distance for vehicles exiting the driveway, no new traffic control improvements are required, and adequate sight distance is provided. Therefore, the Proposed Project represents a less than significant impact.

Transportation (d) Less than Significant Impact: The Proposed Project would conform with all County and Fire Department requirements regarding emergency access, and therefore, would not result in inadequate emergency access. For this reason, the Project represents a less than significant impact.

18. TRIBAL 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 section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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 (sources:1,15,19,22,23)	☐	☒	☐	☐

18. TRIBAL CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (sources: 1,15,19,22,23)	☐	☒	☐	☐

Discussion/Conclusion/Mitigation:

The information contained in this discussion is supplemented with additional information provided by Native American representatives as part of the Tribal consultation process undertaken by the County of Monterey in accordance with AB52.

Tribal Resources (ai) and (a.ii.) Less than Significant Impact with Mitigation: Public Resources Code Sec. 21074 defines a tribal cultural resource as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following: a) included or determined to be eligible for inclusion in the California Register of Historical Resources, [or] b) included in a local register of historical resources as defined in subdivision (k) of [Public Resources Code] Section 5020.1" (Public Resources Code Sec. 21027(a)). No Tribal cultural resources, as defined in Public Resources Code Section 21074, are listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources, are known to exist at the Project site. No known or previously recorded archeological sites are located in or immediately adjacent to the Proposed Project site. Additionally, the field reconnaissance conducted in November 2021 did not find surface evidence of potentially significant historic period archaeological resources. Furthermore, the Proposed Project site is developed with infrastructure associated with the Big Sur Campground and Cabins site and is extensively disturbed in connection with the construction of the existing campground. In December 2022, a subsurface auger testing program was performed in five locations within the Proposed Project site to determine the presence or absence of archaeological deposits. The result of the subsurface auguring program was negative for historic and prehistoric site indicators. The prepared Phase I and Phase II archaeological report included a letter from the Tribal Chairperson for the Esselen Tribe of Monterey County. The Chairperson recalled stories about ancestral village sites along the Big Sur River and the "swimming hole" near the subject property. The Chairperson concluded that "this location is in all likelihood a site that was destroyed when the campgrounds were constructed" and requested cultural resources training for construction crew and tribal monitoring during ground disturbing activities.

Pursuant to Public Resources Code Section 21080.3.1, Monterey County HCD-Planning initiated consultation with local Native American tribes on October 4, 2023. The Esselen Tribe of Monterey County (ETMC) and Ohlone Costanoan Esselen Nation (OCEN) requested tribal consultation.

During consultation (October 31, 2023 and November 6, 2023), representatives of both tribes requested the on-site presence of a Native American monitor to observe excavation activities associated with development of the site. ETMC requested that all ground disturbance related to demolition activities and installation of utilities and foundations be monitored by a ETMC representative. The OCEN representative requested that OCEN monitor all ground disturbing activities and that there be one OCEN monitor for each soils disturbing machine (including hand tools), OCEN be included in any resource recovery program or reburial, and that the applicant send the archaeological report to OCEN. After the consultation with County staff, OCEN and ETMC submitted letters to memorialize the requests made during the consultation. ETMCs letter noted that the surrounding area is a "significant Traditional Esselen Landscape which locates the ethnographic village, *Jojopan*; [and] is the central location of Esselen territory in the District of *Ecgeajan*."

While no known Tribal cultural resources exist at the Project site, other than its existence within a cultural landscape, construction-related activities could potentially affect a buried Tribal cultural resource or previously unknown Tribal cultural resource. This represents a potentially significant impact that would be reduced to a less than significant level through the incorporation of the following mitigation.

As described in Section VI.5 of this Initial Study, a standard County Condition of Approval for protection of cultural resources, PD003(B), would be applied to address the potential inadvertent discovery of cultural resources and reduce potential impacts to a level of less than significant. Due to the negative cultural indicators identified in the auguring programs of the Archaeological and Geotechnical reports, HCD-Planning determined that the requested cultural resources training was not warranted (see Section VI. 5). There is no evidence presented alongside these negative reports that indicates that cultural, significant archaeological resources would be impacted by project implementation. However, as noted by the Chairperson of ETMC, the Project site may have once been occupied by an ancestral village. **Mitigation Measure No. 13** (described below) would require that, if tribal cultural artifacts or human remains are discovered, these resources are treated with appropriate dignity and respect. **Mitigation Measure No. 13** would require that a Tribal Monitor observe all demolition activities and hand digging and machine excavation related to installation of utilities and foundations. With implementation of the County's condition of approval for cultural resources (PD003B) and **Mitigation Measure No. 13**, the potential impact to Tribal Cultural Resources would be less than significant.

Mitigation Measure No. 13 – On-Site Tribal Monitor

To ensure that Tribal Cultural Resources incur a less than significant impact if encountered, a Tribal Monitor approved by the appropriate tribe traditionally and culturally affiliated with the vicinity of the subject parcel and that has consulted with the County and designated one lead

contact person in accordance with AB 52 requirements, or other appropriately Native American Heritage Committee (NAHC)-recognized representative, shall be on-site and observe all demolition activities, hand digging and machine excavation related to installation of utilities and foundations to identify findings with tribal cultural significance. This Tribal Monitor shall have the authority to temporarily halt work in order to examine any potentially significant cultural materials or features. If resources are discovered, the Applicant/Owner/Contractor shall refer to and comply with Condition PD003(B) as applicable. This mitigation is not intended to alleviate responsibility of the owner or its agents from contacting the County Coroner and complying with State law if human remains are discovered.

Compliance Actions for Mitigation Measure No. 13

13a: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the Applicant/Owner shall include a note on the construction plans encompassing the language contained in Mitigation Measure No. 13, including all compliance actions. The Applicant/Owner shall submit said plans to HCD-Planning for review and approval.

13b: Prior to County signature for the release of State HCD Mobilehome or Recreational Vehicle Park Government Agency Approval Form, the Applicant/Owner shall submit evidence to the satisfaction of the Chief of HCD-Planning that a monitor traditionally and culturally affiliated with the vicinity of the subject parcel and that has consulted with the County and designated one lead contact person in accordance with AB 52 requirements, or other appropriately NAHC-recognized representative, has been retained to monitor the appropriate construction activities. The Tribal monitor shall be retained for all demolition activities, hand digging and machine excavation activities related to installation of utilities and foundations.

13c: Prior to final of any State HCD Permit, the Tribal Monitor or other appropriately NAHC recognized representative shall submit a letter to HCD-Planning confirming participation in the monitoring and provide a summary of archaeological and /or cultural finds or no finds, as applicable.

19. UTILITIES AND SERVICE SYSTEMS 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 storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Source:2,5,15,18,22,23,29,34,35,36,37)	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years? (Source: 2,5,15,18,22,23,29,34,35,36,37)	☐	☐	☒	☐
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? (Source: 2,5,15,18,22,23,29,34,35,36,37)	☐	☐	☒	☐
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? (Sources: 2,5,15,18,22,23)	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statues and regulations related to solid waste? (Sources: 2,5,15,18,22,23)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The Project site is currently served by an onsite wastewater system (i.e., septic system). Similarly, the Project site is served by an existing onsite well that has been permitted by the Monterey County Environmental Health Bureau, the capacity of which was evaluated by Utility Services, Inc. Waste Management, Inc. provides waste and recycling services to the existing Project site. Solid waste generated by the Project would be transported and disposed of at the Monterey Peninsula Landfill and Recycling Facility north of the City of Marina, which is operated by the Monterey Regional Waste Management District ("MRWMD"). The landfill has a permitted capacity of 3,500 tons per day of solid waste. Currently, the landfill receives approximately 1,100 tons per day of solid waste. The remaining landfill capacity is approximately 48 million tons or 72 million cubic yards. At current rates of disposal, the landfill will continue to serve the present service area for approximately 150 years.

Utilities and Service Systems (a), (b), and (c) Less than Significant Impact: The Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas/propane, or

telecommunication facilities the construction of which could cause significant environmental effects.

Electricity, Propane, and Communications
The Project site is currently served by overhead electric and communication lines, and propane tanks. Improvements to these utilities would consist of removing all overhead utility lines and replacing them underground. Construction of utility trenching would occur within the existing disturbed areas, including the existing internal circulation route, which is an unpaved, dirt road. The nine (9) propane tanks that currently serve the Project site would be mostly removed, except for those that power the emergency generator. The implementation of mitigation measures identified in this IS/MND would ensure that potential impacts associated with the construction of new infrastructure improvements would be less than significant.

Water Supply
Water is supplied to the Project site from an existing onsite well that is permitted by the Monterey County Environmental Health Bureau (WSN #2701945). As discussed in **Section IV.10 Hydrology and Water Quality**, the well has a daily production capacity of 18,288 gallons. Utilities Services, Inc. evaluated the capacity of the well based on water demand calculations prepared by Whitson Engineers and determined that the onsite well has sufficient capacity to serve the Proposed Project. Moreover, as identified previously, the Proposed Project would not increase use beyond current levels and therefore would not increase demand for water beyond existing demand. Improvements to the water supply system would consist of replacing existing water lines with new lines in substantially the same footprint. Construction would require trenching for the removal and replacement of the existing lines. Trenching would occur within disturbed and developed areas of the Project site. The implementation of mitigation measures identified in this IS/MND would ensure that potential impacts associated with the construction of new infrastructure improvements would be less than significant.

Wastewater System
Wastewater is currently treated through an onsite wastewater system (i.e., septic). The Proposed Project would consist of the demolition of the existing wastewater system and the subsequent construction of a new wastewater system. Construction of the wastewater system would occur within previously developed and disturbed areas, and therefore would not result in a significant environmental impact. To address capacity of the wastewater system, BioHabitats prepared a report titled *Conceptual Wastewater Management Plan Big Sur RC Campground and Cabins,* which evaluated the new wastewater system and the capacity to serve the Project site (Source: 5). The existing wastewater system includes a series of existing and separate septic systems that were originally permitted in 1991 but likely built in the 1950s. Due to the age of the system, and proximity to the Big Sur River and drinking-water wells, a new wastewater system is necessary to ensure maintained capacity and protection of surface and groundwater quality. The design and capacity of the Proposed Project's wastewater system was determined by evaluating the expected usage and the assumptions presented in **Table 14-1**, below.

Table 14-1 Preliminary Wastewater Design Flow Estimates

Campground Common Spaces/Campsites	Units	Occupancy/Usage	Flowrate (gal/per/day)	Flowrate (gal/unit/day)	Occupancy	Total Flows (gal/day)
Park Model	17	2	37.5	75	34	1,275
Mobile Home	4	3		110	12	440
A-Frame Cabin	3	4	37.5	150	12	450
RV/Camper Hookup	82	2		75	164	6,150
Café	100			15		1,500
Staff/Employees	35			11		358
Laundry Machines	4			410		1,640
Factor of Safety for High Usage	1	50	34	1,700		1,700
Camp Workshop/Game Room	1	50	3	150		150
Total					**222**	**13,690**
Source: 5, BioHabitats Conceptual Wastewater Management Plan.						

Compared against the historical peak day water use rate of 13,000 gallons per day, the estimated peak wastewater generation rate for the Project would be 13,690 gallons per day. The improved wastewater system would consist of six (6) primary septic tanks with effluent pumping systems (also referred to as STEP tanks), each tank has a design flowrate between 600 and 3,847 gallons per day, with a holding capacity from 1,200 gallons to 8,000 gallons. The total capacity across all six tanks is 29,200 gallons. Waste from each tank is pumped to an equalization processing tank that has a 30,000-gallon capacity which would transfer wastewater through the membrane bioreactor package system, where it is processed and screened before being pumped to the effluent holding tank and later dispersed. The capacity of the wastewater system was evaluated by BioHabitats and determined sufficient to accommodate demands associated with the existing use of the Project site. The implementation of mitigation measures identified in this IS/MND would ensure that potential impacts associated with the construction of new infrastructure improvements would be less than significant. This represents a less than significant impact.

Utilities and Service Systems (d) and (e) Less than Significant Impact: The Project would not generate solid waste exceeding State or local standards or that exceeds the capacity of local infrastructure. Construction and operation generated waste would be disposed of at the Monterey Peninsula Landfill. The Monterey Peninsula Landfill is operating well below its daily intake capacity. The landfill has a permitted capacity of 3,500 tons per day of solid waste and currently receives approximately 1,100 tons per day. The Proposed Project would not change the existing use of the site or result in an increase in visitor-serving accommodations where an increase in solid waste would be reasonably expected. As such, solid waste generated by the Project would not have a substantial impact on the landfill's capacity. In addition, the Project would comply with all Federal, State, and local statues and solid waste regulations. All waste generated in connection with the Project would be handled in accordance with all applicable statutes and regulations to the extent they are applicable to the Project. For these reasons, this represents a less than significant impact.

20. WILDFIRE **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? (sources:3,4,15,18,22,23,24)	☐	☐	☒	☐
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? (sources: 3,4,15,18,22,23,24)	☐	☐	☒	☐
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? (sources: 3,4,15,18,22,23,24)	☐	☐	☒	☐
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(sources: 3,4,15,18,22,23,24)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The Proposed Project is located in a High Fire Hazard Severity Zone and in a State Responsibility Area. The Project area could be subject to wildland fire hazards. The Project site is served by CalFire and Big Sur Volunteer Fire Brigade.

Wildfire (a), (b), (c), and (d) Less than Significant Impact: The Proposed Project is located in an area that is subject to high fire hazards. Due to the relatively flat, developed nature of the site and existing fuel management efforts, it is unlikely the Proposed Project would result in a potentially significant impact with regards to wildland fires. The Project Biologist prepared a Biological Assessment for the Proposed Project, dated November 14, 2022, which addressed wildland fire and provided fuel management recommendations to be implemented during construction and maintained throughout operation (Source: 14). Additionally, a Fuel Management Plan was prepared for the Proposed Project by Ono Consulting which identified the fuel management zones, reduction zones and provided recommendations to ensure wildfire risk remains less than significant (Source: 30). Furthermore, implementation of vegetation management guidelines and BMPs during construction and operation of the Proposed Project would ensure that fire risk is minimized. The Proposed Project is not located in an area that due to slopes, prevailing winds, and other factors, would exacerbate wildlife fire hazards. Similarly, the Proposed Project does not entail the installation of infrastructure that could exacerbate fire risks or

that may result in temporary or on-going impacts to the environment. And finally, the Proposed Project would not expose people or structures to significant risks because of runoff, post-fire slope instability, or drainage changes. The Proposed Project consists of the demolition of existing campground common spaces, and the construction of new campground common spaces and improvements to the onsite utilities. Construction and operation of the Proposed Project would implement project-wide fuel reduction strategies to minimize potential wildland fire hazards to the Project site. For these reasons, this represents a less than significant impact.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Does the project:	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? (sources:1,2,15,18,19,22,23,30)	☐	☒	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? (sources15,18,19,22,23)	☐	☐	☒	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (sources: 15,18,19,22,23)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Mandatory Findings (a) Less than Significant Impact with Mitigation Incorporated: As discussed in this Initial Study, 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 to eliminate 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 Project would result in temporary construction-related impacts to biological resources that would be mitigated to less than significant through mitigation measures identified above (**Mitigation Measure Nos. 1** through **10**). Similarly, the Project site does not contain, nor is the site located near, any known cultural or Tribal cultural resources. While unlikely, construction could unearth resources that were previously unknown. However, the Proposed Project would implement standard County Conditions of Approval to ensure potential impacts related to the inadvertent discovery of previously unknown resource are minimized. Further, this Initial Study also identifies mitigation measures to ensure potential impacts to previously unknown Tribal cultural resources and Hazard/Hazardous Materials are minimized to a less than significant level (**Mitigation Measure Nos. 11, 12 and 13**). All potentially significant impacts associated with the Proposed Project would be minimized to a less than significant level through the implementation of mitigation measures identified in this Initial Study.

Mandatory Findings (b) Less than Significant Impact: To determine whether a cumulative effect requires an EIR, the lead agency shall consider whether the impact is significant and whether the effects of the project are cumulatively considerable (CEQA Guidelines §15064(h)(1)). In addition, 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 will render those potential impacts less than considerable (CEQA Guidelines 15064(h)(2). This IS/MND contains recommendations and mitigation measures to ensure that all potentially significant impacts are minimized to a less than significant level. Two discretionary projects (PLN160851-AMD1/Morgenrath Martha J TR ET AL and PLN200143/State of California [Pfeiffer Big Sur State Park]) in the vicinity of the Proposed Project were recently approved by the County of Monterey. These two projects were determined to have a less than significant impact on biological and tribal cultural resources with implementation of mitigation measures. When considered together with the Proposed Project, these projects would not result in a potentially significant cumulative impact. Furthermore, the County has identified Conditions of Approval to minimize potential impacts. Implementation of these various measures would ensure that the Project's impacts would be less than significant. The Project would not result in a cumulatively considerable adverse environmental effect. The Project did not result in any significant impacts.

Mandatory Findings (c) Less than Significant Impact: The Proposed Project would not have a substantial adverse effect on human beings, either directly or indirectly. The Proposed Project would result in temporary construction-related impacts that would be minimized to a less than significant level through the incorporation of construction best management measures and mitigation measures identified throughout this Initial Study. The Proposed Project consists of the demolition of existing campground common spaces, and the construction of new campground common spaces and improvements to the onsite utilities. The Project would not result in a change from the existing type or level of use at the site. Additionally, the Proposed Project would not increase overall visitor serving accommodations or result in an increase in traffic.

VIII. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

The State Legislature, through the enactment of Senate Bill (SB) 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a "de minimis" (minimal) effect on fish and wildlife resources under the jurisdiction of the California Department of Fish and Wildlife. Projects that were determined to have a "de minimis" effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of "de minimis" effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the California Department of Fish and Wildlife determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of "no effect" on fish and wildlife resources, development applicants must submit a form requesting such determination to the California Department of Fish and Wildlife. A No Effect Determination form may be obtained by contacting the Department by telephone at (916) 653-4875 or through the Department's website at www.wildlife.ca.gov.

Conclusion: The project will be required to pay the fee.

Evidence: Based on the record as a whole as embodied in the HCD-Planning files pertaining to PLN220106 and the attached Initial Study / Proposed Mitigated Negative Declaration.

IX. SOURCES

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