Final

Initial Study/Mitigated Negative Declaration

for the

B2 RESERVOIR PROJECT

SCH# 2025081340

Prepared for:

Marina Coast Water District
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October 2025

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CHAPTER 1. INTRODUCTION

1.1 Background

This document, together with the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND), constitutes the Final Initial Study/Mitigated Negative Declaration (Final IS/MND) for the B2 Reservoir Project (project or proposed project). The Marina Coast Water District (MCWD) is the lead agency for the proposed project. The Final IS/MND consists of an introduction, comment letters received during the 30-day public review period, responses to comments, and revisions to the Draft IS/MND, if deemed applicable.

1.2 Public Participation

The Draft IS/MND was prepared to inform the public of the potential environmental effects of the project and identify possible ways to minimize project-related impacts. Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15073(a), the Draft IS/MND was circulated for a 30-day review period during which comments could be submitted. In accordance with CEQA, the Final IS/MND is included in the official public record for the Initial Study. On August 28, 2025, the Draft IS/MND was distributed for the public review period to responsible and trustee agencies, interested groups, and individuals. The review period ended on September 29, 2025. A MCWD Board of Trustees meeting is scheduled for October 20, 2025, to consider the adoption of the Final IS/MND and Mitigation Monitoring and Reporting Program (MMRP) and approval of the project.

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CHAPTER 2. RESPONSE TO COMMENTS

2.1 Introduction

This chapter includes comments received from the public and public agencies during the circulation of the Draft IS/MND. This section contains all information available to date in the public record related to the Draft IS/MND.

2.2 List of Comment Letters

The following is a list of comment letters/email comments received on the Draft IS/MND and the dates these letters were received:

Comment Letters

A. California Department of Fish and Wildlife (CDFW) ..... September 29, 2025

A. State Water Resources Control Board (SWRCB) ..... September 29, 2025

A. Monterey Bay Air Resources District (MBARD) ..... September 29, 2025

2.3 Response to Comments

Each letter received on the Draft IS/MND is presented in this chapter, as identified in **Section 2.2** above. Individual comments in each letter are numbered. Correspondingly numbered responses to each comment are provided in the discussion following the comment letter.

If comments received on the Draft IS/MND raise environmental issues that required additions or deletions to the text, tables, or figures in the Draft IS/MND, a brief description of the change is provided, and the reader is directed to **Chapter 3, Revisions to the Draft IS/MND**.

The comments received on the Draft IS/MND did not result in a "substantial revision" of the IS/MND, as defined by CEQA Guidelines Section 15073.5, and the new information added to the IS/MND merely clarifies, amplifies, or makes insignificant modifications to the Draft IS/MND. No new significant impacts were identified since the commencement of the public review period that would require mitigation measures or project revisions to be added to reduce the effects to less than significant.

While responses to comments on a proposed IS/MND are not required by CEQA (Pub. Resources Code, § 21000 et seq.), this Response to Comments document is provided to demonstrate MCWD's careful consideration of the comments in compliance with CEQA. These responses provide MCWD's good faith, reasoned analysis on the major environmental issues raised in the comments.

Letter A: California Department of Fish and Wildlife

Response A-1: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response A-2: MCWD acknowledges CDFW's jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species in its trustee capacity. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response A-3: MCWD acknowledges CDFW's regulatory jurisdiction provided by Fish and Game Code, including for actions that may result in "take" of any species protected under the California Endangered Species Act and for actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. However, no lake or streambed resources are present within or adjacent to the proposed project site; therefore, CDFW's jurisdiction over lake and streambed resources are not applicable to the project. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response A-4: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response A-5: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response A-6: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response A-7: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response A-8: As described on Pages 23-24 and Appendix B of the Draft IS/MND, focused biological surveys for special-status plant species were conducted within the proposed project site in 2023 and 2025 in accordance with the 2000 U.S. Fish and Wildlife (Service) Guidelines for Conducting and Reporting Botanical Inventories for Federally listed, Proposed and Candidate Plants, 2018 CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities, and 2021 California Native Plant Society (CNPS) Botanical Survey Guidelines. As noted in Appendix B, the potential for seaside bird's-beak, Monterey gilia, Yadon's piperia, robust spineflower, and Eastwood's goldenbush to occur within the project site were eliminated based on the results of surveys, which were conducted when these species were blooming and/or would have been identifiable within the project site at the time of the surveys if conducted outside their blooming period. (For example, Eastwood's goldenbush is a perennial shrub which can be identified year-round, and piperia stalks are visible prior to the plant's peak blooming period.) Furthermore, these special-status plant species have not historically been documented within or adjacent to the project site, including during surveys conducted by DD&A in 2016 in support of the environmental analysis for the CSUMB Master Plan. Responses A-9 and A-11 through A-19 below address concerns regarding Crotch bumble bee (CBB), Northern California legless lizard, coast horned lizard, Monterey spineflower, and Kellogg's horkelia, and specific concerns regarding Monterey gilia and seaside bird's-beak.

Response A-9: MCWD acknowledges that the project site is within the current range of CCB and that bumble bees can travel several miles to forage. However, this species has never been documented within the CSUMB campus or on the former Fort Ord; the nearest known occurrence of CBB is approximately 22 miles from the project site at the Hastings Natural History Reservation in Carmel Valley. Given the low habitat quality of the proposed project site and the lack of documented occurrences of CNDDB in the

vicinity of the project, as noted in **Appendix B** of the Draft IS/MND, the potential for CBB to occur within the project site is low and mitigation measures recommended by CDFW to avoid and minimize impacts to this species are unwarranted.

Response A-10: As identified on Pages 35 and 37 of the Draft IS/MND, the special-status HMP species that are known or have the potential to occur within the proposed project site include Monterey spineflower and Northern California legless lizard. Mitigation Measure BIO-1a from the CSUMB Master Plan and EIR identifies additional special-status HMP species for consideration in project-specific biological assessments on the campus. As noted on Page 37 of the Draft IS/MND, the surveys conducted and analysis contained in the Draft IS/MND and **Appendix B** of the Draft IS/MND, which eliminate the potential for other HMP special-status species to occur within the project site, satisfy the requirement for surveys and a project-specific biological assessment.

Response A-11: MCWD disagrees with the comment that only botanical mitigation measures for HMP species are included in the Draft IS/MND and that no mitigation is identified for HMP wildlife species (i.e., Northern California legless lizard). As identified on Page 38 of the Draft IS/MND, impacts to the Northern California legless lizard would be minimized to a less-than-significant level under CEQA through implementation of **Mitigation Measures BIO-4** through **BIO 6**. These measures would minimize impacts to this species through employee education, protection of habitat outside of work limits, implementation of hazardous materials spill prevention, regular disposal of trash to avoid attracting predators, construction-phase biological monitoring and relocation of any special-status wildlife encountered by a qualified biologist holding an appropriate scientific collecting permit, prevention of spread of non-native, invasive species which may degrade habitat for special-status wildlife, and restoration of temporarily disturbed areas following construction. MCWD acknowledges that pre-construction surveys are only required for Monterey dusky-footed woodrat (MDFW) and that no pre-construction surveys are required for coast horned lizard or Northern California legless lizard. This is such because surveys for coast horned lizard and Northern California legless lizard are not practicable as these species can move into a project site at any time, while MDFW surveys consist of identifying stationary nests of this species, which are easily observable. CDFW's recommended Mitigation Measures 5 and 6 to further mitigate impacts to Northern California legless lizard and coast horned lizard are unwarranted and not practical; first, the analysis in the Draft IS/MND already identifies that the project site contains requisite habitat features for these species and **Mitigation Measures BIO-4** through **BIO 6** are already identified to minimize impacts to the species, and, second, observance of 50-foot disturbance buffers around burrow entrances that can provide refuge for these species would not be feasible given the small size of the project site and the location of proposed disturbance.

Response A-12: As noted on Page 30 of the Draft IS/MND, the determination of which special-status plant species occur within or directly adjacent to the project site is based on occurrences documented during biological surveys (i.e., Monterey spineflower and Kellogg's horkelia). Survey results for these species are detailed in the species-species discussion on Pages 32 and 34 of the Draft IS/MND. **Figure 5** on Page 33 of the Draft IS/MND includes a visual representation of the botanical survey results. As identified on Page 30 of the Draft IS/MND, all other special-status plant species are assumed unlikely to occur or to have a low potential to occur based on the species-specific reasons presented in **Appendix B** of the Draft IS/MND.

Response A-13: As described on Pages 23-24 and **Appendix B** of the Draft IS/MND, focused biological surveys for special-status plant species were conducted within the proposed B2 reservoir yard on June 2 and July 19, 2023, and again on April 16, 2025, while focused botanical surveys within the existing B1 reservoir yard were conducted on April 16 and May 7, 2025. These surveys were conducted during the blooming periods of Monterey gilia (April through June) and seaside bird's-beak (April through October) in accordance with CDFW, Service, and CNPS protocols and guidelines. While June is outside the peak Monterey gilia blooming period, DD&A observed that Monterey gilia was still blooming elsewhere within

the CSUMB campus during the June 2023 survey, likely due to the heavy winter rains that year. Similarly, while April and May are early in the blooming period for seaside bird's-beak, this species is still identifiable in these months. Therefore, the proposed B2 reservoir yard was surveyed for Monterey gilia and seaside bird's-beak twice in the last three years with negative findings, while the existing B1 reservoir yard, which is mostly developed or covered with dense iceplant mats, was surveyed once in the last year with negative findings. Furthermore, these species have not historically been documented within or adjacent to the project site, including during surveys conducted by DD&A in 2016 in support of the environmental analysis for the CSUMB Master Plan, and seaside bird's-beak is not known to occur anywhere within the CSUMB campus. It is acknowledged that Monterey gilia and seaside bird's-beak populations fluctuate annually; however, if seedbank is present, individuals are observed, even if the density or extent of the population fluctuates. Therefore, it was determined that these species, their seedbank, or potentially suitable habitat would not be impacted by the proposed project, and no mitigation is required to avoid impacts to or take of these species.

Response A-14: Comment acknowledged. Observance of 50-foot disturbance buffers around special-status plant populations would not be feasible given the small size of the project site and the location of proposed disturbance. However, **Mitigation Measure BIO-2** has been modified to require restoration of Monterey spineflower which are directly *and* indirectly impacted by the project, as determined by a qualified biologist. In accordance with **Mitigation Measure BIO-2**, if the populations of Monterey spineflower identified on **Figure 5** of the Draft IS/MND are directly or indirectly impacted by the project, the acreage of impact will be quantified and restored off-site.

Response A-15: The Kellogg's horkelia individual identified adjacent to the project site is outside of the identified work limits and, therefore, would be protected with protective fencing and construction-phase monitoring per the requirements of **Mitigation Measures BIO-4** and **BIO-5**. **Mitigation Measure BIO-3** is identified in the event that final design includes impacts to this individual given its proximity to the project site and the access route into the project site.

Response A-16: Comment acknowledged. As described on Pages 23-24 of the Draft IS/MND, focused botanical surveys in accordance with the 2000 Service Guidelines for Conducting and Reporting Botanical Inventories for Federally listed, Proposed and Candidate Plants, 2018 CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities, and 2021 CNPS Botanical Survey Guidelines were conducted within the project site in 2023 and 2025. Detailed botanical survey results are included on Pages 32-35 of the Draft IS/MND. Based on the analysis in the Draft IS/MND, no additional focused botanical surveys are proposed or warranted for the project.

Response A-17: Comment acknowledged. Observance of 50-foot disturbance buffers around special-status plant populations would not be feasible given the small size of the project site and the location of proposed disturbance. **Mitigation Measures BIO-1** through **BIO-6** have already been identified to avoid or minimize impacts to special-status plant species.

Response A-18: Comment acknowledged. No state-listed plant species were identified during focused, protocol-level botanical surveys conducted within the project site in 2023 and 2025, and none have been identified within the project site historically. Therefore, the proposed project would not result in take of any state-listed plant species and mitigation to reduce a significant impact is not required.

Response A-19: Comment acknowledged. **Mitigation Measure BIO-2** has been modified to require that the amount of restoration for impacts to Monterey spineflower will be based on the acreage of impacts quantified during final design and finalized after the completion of ground-disturbing activities, and to require that the restoration plan be prepared prior to ground-disturbing activities. Please refer to **Chapter 3, Revisions to the Draft IS/MND**. Restoration at a 1:1 ratio will be conducted for both temporary and permanent impacts to populations and individuals of Monterey spineflower, as shown on **Figure 5** of the

Draft IS/MND. As described on Pages 34-38 of the Draft IS/MND, the proposed project site is located on a parcel designated as "development" under the approved Fort Ord HMP. As described in the Draft IS/MND, parcels designated as "development" have no development restrictions or habitat management requirements if the former Fort Ord land recipient (i.e., CSUMB) is in compliance with the Fort Ord HMP. This is such because, with the designated habitat reserves and corridors and habitat management requirements of the HMP in place, the loss of Fort Ord HMP species (including Monterey spineflower) is not expected to jeopardize the long-term viability of these species and their populations on the former Fort Ord. CSUMB is currently preparing its Resource Management Plan to come into compliance with the Fort Ord HMP; in the interim, **Mitigation Measure BIO-2**, requiring 1:1 restoration for temporary and permanent impacts to Monterey spineflower, is typical mitigation for impacts to this species on the former Fort Ord.

Response A-20: Comment acknowledged. As identified on Pages 36, 37, and 42 of the Draft IS/MND, **Mitigation Measure BIO-7 is** identified and required to be implemented in compliance with the CSUMB's Master Plan EIR and MMRP. In accordance with the Master Plan EIR and MMRP, **Mitigation Measure BIO-7** minimizes potential impacts to nesting birds to a less-than-significant level under CEQA.

Response A-21: Comment acknowledged. As identified on Pages 23-24 and **Appendix B** of the Draft IS/MND, focused biological surveys for special-status plant species were conducted within the proposed project site in 2023 and 2025 in accordance with the CDFW, Service, and CNPS protocols and guidelines.

Response A-22: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response A-23: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response A-24: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Letter B: State Water Resources Control Board

Response B-1: Comment acknowledged. MCWD acknowledges the State Water Board's jurisdiction over public water systems. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response B-2: MCWD revised the text of the Draft IS/MND to include "State Water Resources Control Board, Division of Drinking Water: Domestic Water Supply Permit Amendment" under Section 2.6 Project Approvals, Responsible and State Agencies. Please refer to **Chapter 3, Revisions to the Draft IS/MND**. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response B-3: Comment acknowledged. MCWD will forward the requested items once the CEQA process is complete and as part of the permit application. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response B-4: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Letter C: Monterey Bay Air Resources District

Response C-1: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

Response C-2: Comment acknowledged. MCWD also has prior experience with the presence and proper abatement of subsurface asbestos cement pipe (ACP) with similar projects on the former Fort Ord. If ACP or other asbestos components are encountered or removed during construction, MCWD will follow the proper removal procedures and coordinate with MBARD for the proper removal procedures.

Response C-3: Comment acknowledged. However, the project site will be fenced following construction and public access, including parking, will not be permitted. Furthermore, following build-out of the project and tree replacement, the project site would not be able to accommodate fast charging stations.

Response C-4: Comment acknowledged. The project's 90% plan includes notes to manage dust. The additional best management practices recommended by MBARD to further minimize fugitive dust will be added to the project's final design plans, as applicable for the proposed project.

Response C-5: Comment acknowledged. As requested, MCWD will incorporate cleaner than required equipment and construction equipment that uses alternative fuels when feasible.

Response C-6: MCWD revised the text of the IS/MND to the correct that the North Central Coast Air Basin (NCCAB) is in attainment for the state's ozone standards. Please refer to **Chapter 3, Revisions to the Draft IS/MND**.

Response C-7: Comment acknowledged. As noted on Page 9 of the Draft IS/MND, MCWD will obtain a permit from MBARD for the proposed emergency generator, in compliance with MBARD Rule 201.

Response C-8: Comment acknowledged. MCWD will follow the requested notification protocol if project construction uses portable equipment registered with CARB and obtain permits as necessary for portable equipment not registered with CARD.

Response C-9: Comment acknowledged. This comment does not raise any issues with the analysis of the Draft IS/MND. No further response is required.

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CHAPTER 3. REVISIONS TO THE DRAFT IS/MND

The following section includes revisions to the text of the Draft IS/MND, in amendment form. The revisions are presented by page number in the order they appear in the Draft IS/MND. A description of the edit is provided first, the original text is presented second, and the revised text is presented last.

Page 9 – First List

Edit: MCWD revised this list to include the State Water Resources Control Board, Division of Drinking Water: Domestic Water Supply Permit Amendment as a required state approval.

Original Text:

Regional and State Agencies

- Regional Water Quality Control Board: National Pollution Discharge Elimination System (NPDES) and General Construction Permit
- CSUMB:
  - Quitclaim and Easement
  - Schematic Design Review (e.g., Structural, Mechanical, and Fire Safety Review)
  - Temporary Construction Permit
  - Temporary Access Agreement

Revised Text:

Regional and State Agencies

- State Water Resources Control Board, Division of Drinking Water: Domestic Water Supply Permit Amendment
- Regional Water Quality Control Board: National Pollution Discharge Elimination System (NPDES) and General Construction Permit
- CSUMB:
  - Quitclaim and Easement
  - Schematic Design Review (e.g., Structural, Mechanical, and Fire Safety Review)
  - Temporary Construction Permit
  - Temporary Access Agreement

Page 19 – Table 1

Edit: MCWD revised this table to the correct that the North Central Coast Air Basin (NCCAB) is in attainment for the state's ozone standards.

Original Text:

Table 1. North Central Coast Air Basin Attainment Status Designations

Pollutant	State Designation	National Designation
Ozone (O_3)	Nonattainment-Transitional[1]	Attainment/Unclassified[2]
Inhalable Particulates (PM_{10})	Nonattainment	Unclassified
Fine Attainment ($PM_{2.5}$)	Attainment	Attainment/Unclassified[3]
Carbon Monoxide (CO)	Monterey County-Attainment	Attainment/Unclassified
Nitrogen Dioxide (NO_2)	Attainment	Attainment/Unclassified[4]
Sulfur Dioxide (SO_2)	Attainment	Attainment/Unclassified[5]

Pollutant	State Designation	National Designation
Lead	Attainment	Attainment/Unclassified[6]

Notes
1) Effective July 26, 2007, the ARB designated the NCCAB a nonattainment area for the State ozone standard, which was revised in 2006 to include an 8-hour standard of 0.070 ppm.
2) In 2015, EPA adopted a new 8-hour ozone standard of 0.070 ppm.
3) This includes the 2006 24-hour standard of 35 µg/m3 and the 2012 annual standard of 12 µg/m3.
4) In 2012, EPA designated the entire state as attainment/unclassified for the 2010 NO2 standard.
5) In June 2011, the ARB recommended to EPA that the entire state be designated as attainment for the 2010 primary SO2 standard. Final designations to be addressed in future EPA actions.
6) On October 15, 2008, EPA lowered the NAAQS for lead to 0.15 µg/m3. Final designations were made by EPA in November 2011.
Source: ARB 2018a, MBARD 2018a.

Revised Text:

Table 1. North Central Coast Air Basin Attainment Status Designations

Pollutant	State Designation	National Designation
Ozone (O_3)	Attainment [1]	Attainment/Unclassified[2]
Inhalable Particulates (PM_{10})	Nonattainment	Unclassified
Fine Attainment ($PM_{2.5}$)	Attainment	Attainment/Unclassified[3]
Carbon Monoxide (CO)	Monterey County-Attainment	Attainment/Unclassified
Nitrogen Dioxide (NO_2)	Attainment	Attainment/Unclassified[4]
Sulfur Dioxide (SO_2)	Attainment	Attainment/Unclassified[5]
Lead	Attainment	Attainment/Unclassified[6]

Notes
1) The State ozone standard was revised in 2006 to include an 8-hour standard of 0.070 ppm.
2) In 2015, EPA adopted a new 8-hour ozone standard of 0.070 ppm.
3) This includes the 2006 24-hour standard of 35 µg/m3 and the 2012 annual standard of 12 µg/m3.
4) In 2012, EPA designated the entire state as attainment/unclassified for the 2010 NO2 standard.
5) In June 2011, the ARB recommended to EPA that the entire state be designated as attainment for the 2010 primary SO2 standard. Final designations to be addressed in future EPA actions.
6) On October 15, 2008, EPA lowered the NAAQS for lead to 0.15 µg/m3. Final designations were made by EPA in November 2011.
Source: ARB 2018a, MBARD 2018a.

Page 39 – Mitigation Measure BIO-2: Monterey Spineflower Restoration Plan

Edit: MCWD revised this mitigation to clarify that the mitigation applies to all permanent and temporary impacts to Monterey spineflower and to clarify that the restoration plan must be completed prior to ground-disturbing activities.

Original Text:

Mitigation Measure BIO-2: Monterey Spineflower Restoration Plan

Where avoidance of the Monterey spineflower occurrences is not feasible, the impacted area shall be quantified during final design and Monterey spineflower shall be replaced at a 1:1 ratio for the acreage or individuals impacted and a Restoration Plan shall be prepared by a qualified biologist and implemented. The plan shall include, but is not limited to, the following:

- A description of the baseline conditions of the habitats within the impacted area, including the presence of Monterey spineflower, its location, and density.

- A detailed description of on-site and/or off-site restoration areas, salvage of seed and/or soil bank and/or plant salvage, seeding and planting specifications, which may include but is not limited to, an increased planting ratio to ensure the 1:1 ratio.
- Procedures to control and/or eliminate non-native invasive species within the restoration area(s); and
- A monitoring program that describes annual monitoring efforts which incorporate success criteria and contingency plans if success criteria are not met.

Revised Text:

Mitigation Measure BIO-2: Monterey Spineflower Restoration Plan

Where avoidance of the Monterey spineflower occurrences is not feasible (including indirect impacts, as determined by a qualified biologist), the impacted area shall be quantified during final design and after ground-disturbing activities are completed and Monterey spineflower shall be replaced at a 1:1 ratio for the acreage or individuals impacted. A Restoration Plan shall be prepared by a qualified biologist prior to ground-disturbing activities and implemented following construction (after all impacts are quantified). The plan shall include, but is not limited to, the following:

- A description of the baseline conditions of the habitats within the impacted area, including the presence of Monterey spineflower, its location, and density.
- A detailed description of on-site and/or off-site restoration areas, salvage of seed and/or soil bank and/or plant salvage, seeding and planting specifications, which may include but is not limited to, an increased planting ratio to ensure the 1:1 ratio.
- Procedures to control and/or eliminate non-native invasive species within the restoration area(s); and
- A monitoring program that describes annual monitoring efforts which incorporate success criteria and contingency plans if success criteria are not met.

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ATTACHMENT A
COMMENT LETTERS

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

September 29, 2025

Jack Gao, Senior Project Manager
Marina Coast Water District
920 Second Avenue, Suite A
Marina, California 93933
(831) 883-5962
jgao@mcwd.org

Subject: B2 Reservoir Project (Project)
Mitigated Negative Declaration (MND)
State Clearinghouse No.: 2025081340

Dear Jack Gao:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an Initial Study (IS)/MND from the Marina Coast Water District (MCWD), as Lead Agency, for the above referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Projects that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Projects that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. A-1

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statue for all the people of the State (Fish and Game Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). A-2

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, activities evaluated in a project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish and Game Code, § 1600 et seq.). Likewise, to the extent implementation of a project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). A-3

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened on any State or federal list pursuant to CESA and/or the federal Endangered Species Act (ESA) to be considered Endangered, Rare, or Threatened under CEQA. If a species can be shown to meet the criteria specified in the CEQA Guidelines (Cal. Code Regs., tit. 14, Chapter 3, § 15380), it should be fully considered in the environmental analysis for the Project. A-4

PROJECT DESCRIPTION SUMMARY

Proponent: Marina Coast Water District (MCWD)

Objective: The proposed Project includes installing a new 2.16-million-gallon potable water tank (B2 reservoir) adjacent to an existing 2-million-gallon water tank (B1 reservoir), and associated infrastructure including underground pipeline connecting the reservoirs, paved access road and driveway, retaining wall, percolation basin, new fencing, and small improvements to the B1 reservoir infrastructure. The proposed Project will serve current and future water demands for MCWD water users. Construction activities are expected to last approximately 18 months. A-5

Location: The Project is located on the northwestern corner of the intersection of Colonel Durham Street and Sixth Avenue, within the City of Seaside on the California State University Monterey Bay (CSUMB) campus, within Assessor's Parcel Number (APN) 031-261-002, in Monterey County.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist MCWD in adequately identifying and/or mitigating the Project's significant, or potentially A-6

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significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the IS/MND prepared for this Project.

A-6 cont.

The Project is on the CSUMB campus and on the former Fort Ord. Per the IS/MND, MCWD must comply with the mitigation measures adopted in the Mitigation Monitoring and Reporting Program (MMRP) for the CSUMB Master Plan EIR and comply with the Fort Ord Habitat Management Plan (HMP). The site is within a designated "development" parcel under the HMP.

A-7

Based on a review of the IS/MND, California Natural Diversity Database (CNDDB) records (CDFW 2025), and the surrounding habitat, the Project site is within the geographic range of several special-status animal and plant species, and the IS/MND proposes specific mitigation measures to reduce impacts to these species to a less than significant level. CDFW has concerns about the ability of some of the proposed mitigation measures to reduce impacts to less than significant and avoid unauthorized take for a number of special-status animal species, including, but not limited to: the State endangered and California Rare Plant Rank (CRPR) 1B.1 seaside bird's-beak (*Cordylanthus rigidus ssp. littoralis*); the State threatened, federal endangered, and CRPR 1B.2 Monterey gilia (*Gilia tenuiflora ssp. arenaria*); the State candidate endangered Crotch's bumble bee (*Bombus crotchii*); the State species of special concern northern California legless lizard (*Anniella pulchra*) and coast horned lizard (*Phrynosoma blainvillii*); the federal endangered and CRPR 1B.1 Yadon's rein orchid (*Piperia yadonii*) and robust spineflower (*Chorizanthe robusta var. robusta*); the federal threatened and CRPR 1B.2 Monterey spineflower (*Chorizanthe pungens var. pungens*); and the CRPR 1B.1 Kellogg's horkelia (*Horkelia cuneata ssp. sericea*) and Eastwood's goldenbush (*Ericameria fasciculata*).

A-8

Crotch's Bumble Bee (CBB)

Appendix B of the IS/MND states that the CBB has a low potential to occur within the Project site since the site does not provide adequate sources of nectar for the entire life cycle of the species. CDFW disagrees with this assessment, the Project is within the range of CBB, and while dispersal and foraging distances can vary, bumble bee species can travel several miles to forage (CDFW 2023). CBB primarily nest in late February through late October and are known to inhabit a variety of habitats, including grasslands, scrublands, openings in woodlands, areas with bare ground including vacant lots, dirt roads, and levees (Xerces Society et al. 2018). Overwintering sites utilized by CBB mated queens include soft, disturbed soil (Goulson 2010) or leaf litter or other debris (Williams et al. 2014). Based on information provided in the IS/MND, some of these habitat elements are present within and adjacent to the Project site. Therefore, ground disturbance and vegetation removal associated with Project implementation has the potential to impact local CBB populations. To evaluate potential impacts to CBB,

A-9

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CDFW recommends conducting the following evaluation of the Project site and that the following mitigation measures be included in the MND.

Recommended Mitigation Measure 1: CBB Habitat Assessment
CDFW recommends a qualified biologist conduct a habitat assessment prior to ground-disturbing activities to determine if portions of the Project site and immediate surrounding vicinity contain habitat suitable to support CBB. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment.

Recommended Mitigation Measure 2: CBB Surveys
If potentially suitable habitat is identified, CDFW recommends that additional surveys be conducted for CBB, and their requisite habitat features, following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023).

Recommended Mitigation Measure 3: CBB Avoidance
If CBB is detected, then CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB prior to or during Project implementation warrants consultation with CDFW to discuss how to avoid take.

Recommended Mitigation Measure 4: CBB Take Authorization
If take cannot be avoided, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

A-9 cont.

MMRP Mitigation Measures (MM)-BIO-1a: Project-Specific Biological Assessments (HMP Species); and MMRP MM-BIO-1b: Project-Specific Biological Assessments (Non-HMP State Species of Special Concern)

The Fort Ord HMP species, as described in the IS/MND, include the California tiger salamander, Smith's blue butterfly, northern California legless lizard, Monterey ornate shrew, Monterey spineflower, sand gilia, sandmat manzanita, Hooker's manzanita, Toro manzanita, Monterey ceanothus, seaside bird's-beak, coast wallflower, Eastwood's goldenbush and Yadon's piperia. Per the IS/MND, the northern California legless lizard and Monterey spineflower occur or have the potential to occur in the Project site. CDFW agrees with MMRP MM-BIO-1a requiring that a biological survey of the Project site be

A-10

A-11

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conducted by a qualified biologist, prior to any ground-disturbing activities, to determine if the proposed development could potentially impact HMP species or potential habitat. However, only botanical focused protocol-level surveys and botanical mitigation measures are included in the IS/MND, focused protocol-level surveys and avoidance measures for the northern California legless lizard are not included in the IS/MND. It is unclear if avoidance measures will be implemented for the northern California legless lizard.

MMRP BIO-1b includes the requirement of conducting biological surveys for non-HMP special status species, and if those species are observed or determined to have the potential to occur the project biologist will recommend mitigation measures. The IS/MND indicates that there is potential habitat for the Monterey dusky-footed woodrat and coast horned lizard, and they have the potential to occur in the Project site, however, the IS/MND only includes species specific measures for the Monterey dusty-footed woodrat. It is unclear if avoidance measures will be implemented for the coast horned lizard.

To evaluate potential impacts to northern California legless lizard and coast (NCLL) horned lizard (CHL) CDFW recommends the following mitigation measures be included in the MND.

> **Recommended Mitigation Measure 5: NCLL and CHL Focused Surveys**
> CDFW recommends that a qualified biologist conduct focused surveys for northern California legless lizard and the coast horned lizard, and their requisite habitat features to evaluate potential impacts resulting from ground- and vegetation-disturbances.
>
> **Recommended Mitigation Measure 6: NCLL and CHL Avoidance**
> Avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around burrows entrances of burrows that can provide refuge for small mammals, reptiles, and amphibians.

A-11 cont.

Special Status Plants - Monterey gilia, Seaside bird's-beak, Monterey spineflower, and CRPR plant species

The Project site is within the geographic range of several special-status plants, including Monterey gilia, seaside bird's-beak, and Monterey spineflower. The IS/MND indicates protocol level botanical surveys were conducted in 2023 and 2025, and during those surveys Monterey spineflower and Kellogg's Horkelia were detected. Detailed survey results were not included in the IS/MND, and thus the nature of the survey effort is unclear.

A-12

Monterey gilia and seaside bird's-beak are known to occur in the vicinity of the Project site (USFWS 2008, CDFW 2025). The sandy soils and maritime chaparral contain suitable habitat for the CESA-listed Monterey gilia (USFWS 2008) and seaside bird's

A-13

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beak. In addition, seeds from both of these species may be present under other vegetation types. CESA extends to all stages of the species, so its take prohibition includes seed banks. Ground-disturbing activities and development associated with the Project have the potential to impact these special-status plant species. A-13 cont.

Mitigation Measure BIO-1, Monterey Spineflower Salvage, states that occurrences of Monterey spineflower will be avoided to the greatest extent feasible, individuals or populations that will not be impacted by the project will be protected during construction to the maximum extent possible through the use of exclusionary fencing and/or flagging. It is unclear if the fencing/flagging will include a no-disturbance buffer around the individual/population and how large that buffer will be, it is also unclear what "will not be impacted by the project" means. Individuals or populations that are not directly disturbed by ground-disturbing activities could be impacted by the Project if the surrounding habitat changes (e.g. changes in shade or sunlight, changes in hydrology, etc.). CDFW has concerns regarding the survival of individuals/populations within the Project site, since impacts to the surrounding habitat and associated impacts to the Monterey spineflower are not properly analyzed in the IS/MND. A-14

The IS/MND does not include avoidance measures for other special status plant species, such as for the Kellogg's Horkelia. MM BIO-3 requires the development of a Rare Plant Restoration Plan for non-HPM species that cannot be avoided, however, it is unclear if attempts will be made to fully avoid other special status plant species. A-15

Recommended Mitigation Measure 7: Survey Results and Focused Surveys

CDFW recommends detailed survey results, including methods, datasheets, and maps are submitted to CDFW for review prior to ground-disturbing activities. If additional surveys are advised, CDFW recommends that the Project site be surveyed for special-status plants by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (CDFW 2018). This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. In the absence of protocol-level surveys being performed, additional surveys may be necessary. A-16

Recommended Mitigation Measure 8: Special-Status Plant Avoidance
CDFW recommends special-status plant species be avoided whenever possible by delineation and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species. A-17

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Recommended Mitigation Measure 9: Special-Status Plant Take Authorization
If a State-listed plant species is identified during botanical surveys, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization would need to occur through issuance of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b). A-18

Special Status Plant Restoration Plans

MM BIO-2 requires the development of a Monterey Spineflower Restoration Plan, and states that the impact area will be quantified during final design and Monterey spineflower will be replaced at a 1:1 ratio for the acreage or individuals impacted. It is unclear if the final impact area will also include individuals and populations that are impacted post-final design, including individuals and populations in exclusion areas that are directly impacted during ground-disturbing and construction activities, and individual/populations that are impacted due to changes in the surrounding habitats. Further, it is unclear what areas of the species' habitat are considered temporary impacts, and which areas are considered permanent impacts. CDFW has concerns regarding the proposed mitigation ratio of 1:1 for permanent impacts to this species. MM BIO-3 requires the development of a Rare Plant Restoration Plan for non-HPM species and also includes a 1:1 mitigation ratio. CDFW has the same comments and concerns as with MM BIO-2. A-19

Recommended Mitigation Measure 10: Special-Status Plant Restoration Plans
CDFW recommends MCWD consult with CDFW during the development of their proposed Monterey Spineflower Restoration Plan and Rare Plant Restoration Plan, and that the restoration plans are finalized prior to ground-disturbing activities.

Editorial Comments and/or Suggestions

Nesting birds: CDFW encourages that Project ground-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above. A-20

CDFW further recommends that a qualified biologist conduct a pre-construction survey for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any

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area potentially affected, either directly or indirectly, by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist establish a behavioral baseline of all identified nests. Once Project activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is a compelling biological or ecological reason to do so, such as when the Project site would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance. A-20 cont.

CNDDB: Please note that the CNDDB is populated by records through voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDB does not mean a species is not present. To adequately assess any potential Project related impacts to biological resources, surveys conducted by a qualified biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted to determine whether any special-status species are present at or near the Project site. A-21

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to the CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to the CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. A-22

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FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). A-23

CONCLUSION

CDFW appreciates the opportunity to comment on the IS/MND to assist MCWD in identifying and mitigating Project impacts on biological resources. A Mitigation Monitoring and Reporting Program (Attachment 1) is included below to assist MCWD with incorporating the recommended mitigation measures provided above.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). If you have any questions regarding this letter or further coordination, please contact Jackson Powell, Environmental Scientist, at the address provided on this letterhead by electronic mail at Jackson.Powell@wildlife.ca.gov. A-24

Sincerely,

DocuSigned by:
Julie Vance
FA83F09FE08945A...

Julie A. Vance
Regional Manager

Attachment (MMRP)

ec: State Clearinghouse
Land Use and Climate Innovation
State.Clearinghouse@lci.ca.gov

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REFERENCES

California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. California Department of Fish and Wildlife. March 20, 2018.

California Department of Fish and Wildlife. 2023. Survey considerations for California Endangered Species Act candidate bumble bee species. California Department of Fish and Wildlife, Sacramento, California, USA.

California Department of Fish and Wildlife. 2025. Biogeographic information and observation system. <https://www.wildlife.ca.gov/Data/BIOS>. Accessed 24 September 2025.

Goulson, D. 2010. Bumblebees: behaviour, ecology, and conservation. OxfordUniversity Press, New York. 317pp.

U. S. Fish and Wildlife Service. 2008. Monterey Gilia Five-Year Review: Summary and Evaluation. March 2008

Williams, P. H., R. W. Thorp, L. L. Richardson, and S.R. Colla. 2014. Bumble bees of North America: an identification guide. Princeton University Press, Princeton, New Jersey. 208pp

Xerces Society for Invertebrate Conservation, Defenders of Wildlife, and Center for Food Safety. 2018. A petition to the state of California fish and game commission to list the Crotch's bumble bee (*Bombus crotchii*), Franklin's bumble bee (*Bombus franklini*), Suckley cuckoo bumble bee (*Bombus suckleyi*), and western bumble bee (*Bombus occidentalis occidentalis*) as Endangered under the California Endangered Species Act.

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Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: B2 Reservoir Project (Project)
SCH# 2025081340

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Disturbing Soil or Vegetation	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 1: CBB Habitat Assessment	
Recommended Mitigation Measure 1: CBB Surveys	
Recommended Mitigation Measure 4: CBB Take Authorization	
Northern California Legless Lizard (NCLL) and Coast Horned Lizard (CHL)	
Recommended Mitigation Measure 5: NCLL and CHL Surveys	
Special-Status Plants	
Recommended Mitigation Measure 7: Survey Results and Focused Surveys	
Recommended Mitigation Measure 9: Special-Status Plant Take Authorization	
Recommended Mitigation Measure 10: Special-Status Plant Restoration Plans	
During Construction	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 3: CBB Avoidance	
Northern California Legless Lizard (NCLL) and Coast Horned Lizard (CHL)	
Recommended Mitigation Measure 6: NCLL and CHL Avoidance	
Special-Status Plants	
Recommended Mitigation Measure 8: Special-Status Plant Avoidance	

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CALIFORNIA Water Boards

GAVIN NEWSOM
GOVERNOR

YANA GARCIA
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

September 29, 2025

Mr. Jack Gao
Marina Coast Water District
920 2nd Avenue, Suite A,
Marina, CA 93933

MARINA COAST WATER DISTRICT (WATER SYSTEM), INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR THE B2 RESERVOIR PROJECT (PROJECT), STATE CLEARINGHOUSE #2025081340

Dear Mr. Gao:

Thank you for the opportunity to review the IS/MND for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (DDW), issues domestic water supply permits under the Safe Drinking Water Act. This Project falls under DDW's Monterey District jurisdiction. The Monterey District issues permit amendments according to the Title 22 California Code of Regulations (Cal. Code Regs) chapter 16. Public water systems need a permit amendment for modification of the water supply including new sources, new reservoirs with 100,000-gallon capacity or greater, service area expansions of twenty percent or more, and treatment design capacity or process changes as per Cal. Code Regs. § 64556. B-1

The State Water Board, DDW, as a responsible agency under the California Environmental Quality Act (CEQA), has the following comments on the IS/MND:

- The Water System will need to apply for a permit amendment for the addition of a new distribution reservoir. Under Section 2.6 Project Approvals, Responsible and State Agencies, please add “State Water Resources Control Board, Division of Drinking Water: domestic water supply permit amendment.” B-2

When the CEQA process is completed, please forward the following items with the permit application to the State Water Board, DDW Monterey District at DWPDIST05@waterboards.ca.gov:

- The IS/MND, Mitigation Monitoring and Reporting Plan (MMRP), and comments received and the lead agency responses as appropriate;
- The Resolution or Board Minutes certifying/adopting the IS/MND and approving the Project; and
- The Notice of Determination filed at the County Clerk’s Office and the State Clearinghouse. B-3

B-4

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, for questions regarding this comment letter.

Sincerely,

Lori Schmitz Digitally signed by Lori Schmitz Date: 2025.09.29 13:24:03 -07'00'

Water Boards

Lori Schmitz
Environmental Scientist
Division of Financial Assistance
Special Project Review Unit
1001 I Street, 16th floor
Sacramento, CA 95814

Cc:

State Clearinghouse

Jonathan Weininger
District Engineer
Monterey District

Anna Snyder
Water Resource Control Engineer
Monterey District

Monterey Bay Air Resources District
Serving Monterey, San Benito, and Santa Cruz Counties

24580 Silver Cloud Court
Monterey, CA 93940

PHONE: (831) 647-9411 • FAX: (831) 647-8501

September 29, 2025

Jack Gao
Senior Project Manager
Marina Coast Water District
920 2nd St. Ste. A
Marina, CA 93933
Submitted via email: jgao@mcwd.org

Re: Mitigated Negative Declaration: B2 Reservoir Project

Dear Mr. Gao

Thank you for providing the Monterey Bay Air Resources District (MBARD) with the opportunity to comment on the Mitigated Negative Declaration (MND) and Initial Study (IS) for the B2 Reservoir Project. MBARD has reviewed the IS and has the following comments: C-1

Subsurface Asbestos Cement Pipe (ACP) and Other Asbestos Components

MBARD has prior experience with the presence and proper abatement of subsurface asbestos cement pipe (ACP) along with associated components and other buried asbestos containing materials on undeveloped/vacant land around Fort Ord. Proper procedures must be followed during construction activities when encountering and/or removing ACP or other asbestos-containing subsurface infrastructure. For further information regarding ACP and asbestos related items, please contact Bronwyn Nielson with MBARD at (831) 718-8024. C-2

Greenhouse Gas Emissions

To achieve further emission reduction of criteria pollutants and greenhouse gases, MBARD suggests including publicly available dual-port Level 2 & DC fast-charge charging stations throughout the project area. C-3

Fugitive Dust Control

Fugitive dust can be mitigated while maintaining compliance with MBARD Rule 402 (Nuisance) and CEQA Guidelines, Section 8.2 by implementing applicable Best Management Practices, such as: C-4

- Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
- Prohibit all grading activities during periods of high wind (over 15 mph).
- Cover all trucks hauling dirt, sand, or loose materials.
- Cover inactive storage piles.
- Maintain at least 2’ of freeboard in haul trucks.
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).

Construction Equipment

To further reduce construction emissions, MBARD recommends using cleaner than required equipment that conforms to the California Air Resources Board's (CARB) Tier 3 or Tier 4 emission standards. MBARD also recommends using construction equipment that uses alternative fuels when feasible, such as compressed natural gas (CNG), propane, electricity, or biodiesel. This would have the added benefit of reducing diesel exhaust emissions and odors. C-5

Attainment Status

On page 19 Table 1, the IS designates the North Central Coast Air Basin (NCCAB) as "Nonattainment-Transitional" for ozone. The NCCAB is currently in attainment for the State's 1-hour and 8-hour ozone standards. Please visit the California Air Resources Board's (CARB) State and Federal Area Designations webpage for more details- State and Federal Area Designations | California Air Resources Board. C-6

Engine Permitting

Please ensure that that proposed emergency generator to be used for maintenance and testing operations complies with MBARD Rule 201, if applicable. Per Rule 201, any stationary piston-type internal combustion engine of greater than or equal to 50 brake horsepower (bhp) requires a permit. Please contact MBARD's Engineering Division at (831) 657-9411 if there are any questions regarding the permitting process. C-7

Portable Equipment Registration Program

If project construction uses portable equipment registered with CARB in the Portable Equipment Registration Program (PERP), MBARD must be notified within two working days of commencing operations when the registered unit will be at the location for more than five days. Portable equipment not registered with CARB may be subject to MBARD permit requirements. C-8

MBARD appreciates the opportunity to comment on the MND and IS for the B2 Reservoir Project. Please let me know if you have any questions. I can be reached at (831) 718-8030 or eballaron@mbard.org. C-9

Regards,



Edward Ballaron
Air Quality Planner II

cc: Richard A. Stedman, Air Pollution Control Officer
David Frisbey, Planning and Air Monitoring Manager
Shawn Boyle, Planning and Air Monitoring Supervisor