

**Final  
Initial Study/Mitigated Negative Declaration  
for the  
Pajaro/Sunny Mesa Springfield Area Regional Consolidation Project  
SCH# 2025110647**

**Prepared for:**



**Pajaro/Sunny Mesa Community Services District**

**Prepared by:**



**Denise Duffy & Associates, Inc.**

**February 10, 2026**

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### Attachment A – Comment Letters

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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 Pajaro/Sunny Mesa Springfield Area Regional Consolidation Project (“Project” or “Proposed Project”). The Pajaro/Sunny Mesa Community Services District (“District”) is the lead agency for the Proposed Project. The Final IS/MND consists of an introduction, a list of 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 November 18, 2025, the Draft IS/MND was distributed for the public review period to responsible and trustee agencies, interested groups, and individuals. The District also filed a Notice of Availability/Notice of Intent (“NOA/NOI”) to adopt an MND with the Governor’s Office of Land Use and Climate Innovation (“State Clearinghouse”), posted copies of the NOA/NOI at the various project sites as well as off-site locations (as required per CEQA Guidelines Section 15072(b)) and the Monterey County Clerk. In accordance with Section 15105(b) of the State CEQA Guidelines, the public review period ended on December 17, 2025. Copies of all written comments received on the Draft IS/MND are contained in this Final IS/MND (refer to **Attachment A**).

Based on the analysis conducted in this IS/MND (including any comments received), there is no substantial evidence that the Project would have a significant environmental impact. Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. Argument, speculation, and unsubstantiated opinion or narrative do not constitute substantial evidence (CEQA Section 21080(e); State CEQA Guidelines Section 15064(f)(5)). The Project features and measures identified in the Final IS/MND will be required as conditions of certification of approval for the Proposed Project would avoid or reduce all impacts to a less-than significant level.

A District Board of Directors meeting is scheduled for February 26, 2026 to consider the adoption of the Final IS/MND and approval of the Project.

This IS/MND is organized as follows:

- Chapter 1: “Introduction.” This chapter provides an introduction to the IS/MND and public review process, including organization of this document.
- Chapter 2: “Response to Comments.” This chapter presents the comments received during the public review period and responses to comments.
- Chapter 3: “Revisions to the Draft IS/MND.” This chapter presents revisions to the IS/MND based on comments received during the public review period.

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## CHAPTER 2. RESPONSE TO COMMENTS

### 2.1 Introduction

This chapter includes comments received from members of 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 comments received on 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. Amah Mutsun Tribal Band of San Juan Bautista.....	11/18/2025
B. California Department of Transportation (“Caltrans”) .....	12/17/2025
C. Monterey Bay Air Resources District (“MBARD”).....	12/17/2025

### 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. The text of comments received is presented below, with some editing to summarize the overall intent of the comment and/or to reduce text not relevant to the environmental analysis contained in the Draft IS/MND. Comments are reproduced in full in **Attachment A**. 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 in order 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 the District’s careful consideration of the comments in compliance with CEQA. These responses provide the District’s good faith, reasoned analysis on the major environmental issues raised in the comments.

## Letter A: Amah Mutsun Tribal Band of San Juan Bautista

**Comment A-1:** The comment provides introductory information and contact information for Amah Mutsun Tribal Band of San Juan Bautista should the District have any questions on the comments provided.

**Response A-1:** These introductory remarks are acknowledged for the record. Responses to specific comments are provided below. In addition, the District held a consultation call with representatives of the Amah Mutsun Tribal Band of Mission San Juan Bautista on September 12, 2024. No changes to the analysis or conclusions of the Draft IS/MND are required as a result of this comment.

**Comment A-2:** This commenter notes that the states that the Amah Mutsun Tribal Band of San Juan Bautista is available to provide Native American Cultural Resource Monitoring, Consulting and/ or Sensitivity Training services for the Project.

**Response A-2:** The District will contact representatives of the Amah Mutsun Tribal Band of San Juan Bautista and other tribes who requested to be part of tribal monitoring for the Project prior to construction. No changes to the analysis or conclusions of the Draft IS/MND are required as a result of this comment.

**Comment A-3:** This comment recommends a search through Sacred Lands Files (“SLF”) and California Historical Resource Information Systems (“CHRIS”) as well as reaching out to the Native American Heritage Commission (“NAHC”) in order to determine if work would occur in an area of Cultural and/ or Historic sensitivity.

**Response A-3:** The District’s consultant contacted the NAHC and performed a search through the SLF and CHRIS databases as part of the Phase I Archaeological Assessment of the Project. A summary of the non-confidential findings of the Phase I Archaeological Assessment is provided in Section 3.5 of the Draft IS/MND. No changes to the analysis or conclusions of the Draft IS/MND are required as a result of this comment.

**Comment A-4:** The commenter suggests that if any areas of positive cultural or historic sensitivity are present within one (1) mile of the Project area, the District should adhere to the following specific recommendations from A.M.T.B Inc. and Amah Mutsun Tribal Band of San Juan Bautista:

- All Crews, Individuals and Personnel who will be moving any earth be Cultural Sensitivity Trained.
- A Qualified California Trained Archaeological Monitor is present during any earth movement.
- A Qualified Native American Monitor is present during any earth movement.

The commenter provides relevant contact information in the event further Consultation, Monitoring or Sensitivity Training is needed.

**Response A-4:** A cultural sensitivity training for all construction personnel involved with ground disturbing activities is included in Mitigation Measure CUL-1. Archaeological monitoring for a minimum of specific sensitive areas is also proposed as specified in Mitigation Measure CUL-2. Tribal monitoring throughout ground disturbing activities is identified in Mitigation Measure TCR-1.

Mitigation measures for cultural and tribal resources were prepared based on the suggestion of tribes who participated in consultation under AB 52, including the Amah Mutsun Tribal Band of Mission San Juan Bautista. No changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment as the commenter's recommendations were followed as documented above.

**Comment A-5:** The commenter recommends that the District undertake a sensitivity training for Tribal Cultural Resources. Specifically, the commenter recommends that the District, in consultation with their Cultural Resources Team, retain the services of an Ohlone Native American representative and/or archeological consultant from the Qualified List of Archeological Consultants to provide cultural sensitivity and archeological awareness training to all work crews who will be involved in ground disturbing activities at the Project site. The commenter recommends that this training be used to inform all project contractors, subcontractors and work crew members to be on the alert for evidence of the presence of potential tribal cultural resource(s) and how to identify the evidence of such a resource(s) during construction. In addition, the commenter recommends that the training cover procedures for stoppage of work, protection of resources, and requirements for notification in the event of a suspected discovery of a tribal cultural resource by construction crew members.

**Response A-5:** Comment acknowledged. This recommendation is largely consistent with Mitigation Measure CUL-1 as outlined in the Draft IS/MND. Mitigation measures for cultural and tribal resources were prepared based on the suggestion of tribes who participated in consultation under AB 52, including the Amah Mutsun Tribal Band of Mission San Juan Bautista. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment A-6:** The commenter recommends that the District provide clear direction for the potential stoppage of work in the event of the discovery of tribal cultural resources and adhere to standard procedures for notification in the event of a discovery. Specifically, the commenter recommends that, in the event that any indication of a tribal cultural resource is encountered during soil disturbing activity of the project, the Project's construction contractor and/or the District shall immediately notify representatives of the Amah Mutsun Tribal Band of San Juan Bautista. In addition, the commenter recommends that all work be immediately stopped and any soils-disturbing activities be suspended in the vicinity of a potential discovery until a Tribal Cultural Monitor and a qualified archeological consultant from the Qualified Archeological Consultants List have assessed the find and the respective parties have determined whether and what additional measures should be undertaken.

**Response A-6:** Comment acknowledged. This recommendation is largely consistent with Mitigation Measure CUL-3 as outlined in the Draft IS/MND. Mitigation measures for cultural and tribal resources were prepared based on the suggestion of tribes who participated in consultation under AB 52, including the Amah Mutsun Tribal Band of Mission San Juan Bautista. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment A-7:** The commenter recommends that the District develop procedures for the preservation in place of any potential tribal cultural resource discovered during ground disturbing activities. Specifically, the commenter recommends that the District, the District's archeological consultant, and the Ohlone representative consult to determine whether preservation in place would be feasible and

effective in preserving the values represented by the resource. The commenter recommends that the District's archeological consultant, in consultation with the Ohlone representative, document the potential find to current professional standards. The commenter notes that the tribe may also require that the District immediately implement a site security program if the resource is at risk from vandalism, looting, or other damaging actions.

The commenter recommends that if the evaluation determines that preservation-in-place of the tribal cultural resource would be both feasible and effective, the archeological consultant prepare a Resource Preservation Plan ("RPP") in consultation with the Ohlone representative for review and implementation by the District during construction.

The commenter recommends that if the evaluation determines that preservation in place would not be feasible or effective, then additional archeological assessment and treatment shall be implemented and in consultation with the Ohlone representative, as detailed in **Comments A-8** and **A-9**.

**Response A-7:** Mitigation Measure CUL-3 requires a qualified archaeologist in consultation with a Tribal Citizen affiliated with one (1) or more of the Tribes who requested consultation with the District for the Proposed Project to determine appropriate mitigation measures to prevent any impacts on previously undiscovered cultural resources encountered during construction, which may include preservation in place. Specific mitigation for any finds would be determined by the qualified archaeologist and Tribal Citizen on a case-by-case basis, depending on the specific nature of the find. Mitigation measures for cultural and tribal resources contained in the Draft IS/MND were prepared based on the suggestion of tribes who participated in consultation under AB 52, including the Amah Mutsun Tribal Band of Mission San Juan Bautista. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment A-8:** The commenter recommends that the District adhere to the following recommendations regarding archeological treatment of potential finds. Specifically, the commenter recommends that if the Ohlone representative and the District determine that preservation-in-place of a potential tribal cultural resources is not a sufficient or feasible option to preserve the values represented by the resource, then the District's archeological consultant, in consultation with the Ohlone representative, should conduct an archeological assessment to determine the significance of the find and determine whether it retains sufficient integrity to warrant additional treatment. The commenter recommends that if the tribal cultural resource is determined to be a significant archeological resource, the District's archeological consultant, in consultation with the Ohlone representative, prepare recommended appropriate archeological treatment to preserve the data and values of the tribal cultural resource, which may include archeological data recovery. The commenter also recommends that any data recovery be implemented in consultation with the Ohlone representative and should include appropriate analyses and reporting. In addition, the commenter notes that if an archeological interpretive, monitoring, and/or testing program is required, it should be consistent with Standard Guidelines for such programs and shall be implemented immediately.

**Response A-8:** Mitigation Measure CUL-3 requires a qualified archaeologist, in consultation with a Tribal Citizen affiliated with one (1) or more of the Tribes who requested consultation with the District for the Proposed Project, to evaluate potential finds and provide additional treatment

recommendations. Mitigation measures for cultural and tribal resources were prepared based on the suggestion of tribes who participated in consultation under AB 52, including the Amah Mutsun Tribal Band of Mission San Juan Bautista. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment A-9:** The commenter recommends that the District adhere to the following recommendations regarding archeological treatment of human remains and funerary objects. Specifically, the commenter recommends that the treatment of any human remains, and funerary objects discovered during any soils disturbing activity shall comply with applicable State laws, including Section 7050.5 of the Health and Safety Code and Public Resources Code 5097.98. The commenter recommends that if human remains or suspected human remains are encountered during construction, the contractor and District shall ensure that ground-disturbing work within 50 feet of the remains is halted immediately and shall arrange for the protection in place of the remains until appropriate treatment and disposition have been agreed upon and implemented in accordance with this section. The commenter recommends that the District immediately notify the Medical Examiner of the County in which the job resides and the Tribe of the find. In the event of the Medical Examiner’s determination that the human remains are Native American in origin, the Medical Examiner will notify the NAHC within 24 hours and all provisions of Public Resources Code 5097.98 will be followed.

**Response A-9:** Mitigation Measure CUL-4 outlines treatment of human remains inadvertently discovered during construction of the Project. Funerary objects would be subject to the requirements of Mitigation Measure CUL-3 as noted in the above response. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment A-10:** The commenter recommends that the District facilitate preparation of an interpretive program for tribal cultural resources. Specifically, the commenter recommends that if the Ohlone representative and the District determine that preservation-in-place of the tribal cultural resource is not a sufficient or feasible option, the District, in consultation with local Native American representatives, shall prepare a Cultural Resources Public Interpretation Plan (“CRPIP”) to guide the interpretive program. The commenter recommends that the CRPIP shall be submitted for review and approval prior to implementation of the program. The commenter recommends that the District implement the interpretive program upon approval of the CRPIP. The commenter also recommends that the District work with the tribal representative to identify the scope of work by the tribal representative to fulfill the requirements of the CRPIP, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, artwork). The commenter notes that tribal representatives would require compensation for their work based upon an agreed upon scope of work prior to preparation of the CRPIP.

**Response A-10:** Mitigation Measure CUL-3 requires a qualified archaeologist, in consultation with a Tribal Citizen affiliated with one (1) or more of the Tribes who requested consultation with the District for the Proposed Project, to evaluate potential finds and provide additional treatment recommendations, which, though not specifically listed, could potentially include preparation of an interpretive program. Specific mitigation for any finds would be determined by the qualified archaeologist and Tribal Citizen on a case-by-case basis, depending on the specific nature of the find.

Furthermore, mitigation measures contained in the Draft IS/MND for cultural and tribal resources were prepared based on the suggestion of tribes who participated in consultation under AB 52, including the Amah Mutsun Tribal Band of Mission San Juan Bautista. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

## Letter B: California Department of Transportation (“Caltrans”)

**Comment B-1:** This comment provides an overview of the Proposed Project and notes that the Proposed Project system improvements run along and across the State Highway System (“SHS”), with work within the states right of way in some areas, where Caltrans has permitting authority.

The commenter also indicates their support for local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety.

**Response B-1:** These introductory remarks are acknowledged and referred to decision makers. The District recognizes Caltrans’ permitting authority over the Proposed Project. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment B-2:** The commenter notes that work within the State Right-of-Way will require a Caltrans Encroachment Permit, including establishment of construction staging areas.

**Response B-2:** A Caltrans Encroachment Permit is included under the list of approvals presented on page 34 of the Draft IS/MND. The District will pursue a Caltrans Encroachment Permit for work within the State Right-of-Way. No changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment B-3:** The commenter notes that any construction staging for the Proposed Project that is located within the State’s right-of-way would require permitting from Caltrans, and that all materials in staging areas must be stored outside of the Clear Recovery Zone.

**Response B-3:** The District will ensure that any construction staging for the Proposed Project permitted within the State’s right-of-way would be located outside of the Clear Recovery Zone. No changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment B-4:** The commenter notes that any work is completed in the State’s right-of-way will require an encroachment permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The standards detailed in the Caltrans Encroachment Permit Manual should be followed. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and the comment letter does not limit those future conditions and requirements. The commenter has provided online resources regarding additional information on the encroachment permit process.

**Response B-4:** A Caltrans Encroachment Permit is included under the list of approvals presented on page 34 of the Draft IS/MND. The District will pursue a Caltrans Encroachment Permit for work within the State Right-of-Way. The District will ensure that all work conducted under the Caltrans Encroachment Permit is in accordance with the standards detailed in the Caltrans Encroachment Permit Manual, as well as any additional conditions of approval associated with the Caltrans Encroachment Permit. No changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment B-5:** The commenter provides direction on submittal process of the completed encroachment permit application.

**Response B-5:** The District and/or their designees shall submit the application package to Caltrans using one of the approaches identified above. No changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

## Letter C: Monterey Bay Air Resources District (“MBARD”)

**Comment C-1:** The commenter provides introductory remarks and introduces comments and recommendations, which are provided in subsequent comments in full.

**Response C-1:** Responses to individual comments provided by MBARD are provided below. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment C-2:** MBARD recommends the District continue utilizing the MBARD CEQA Air Quality Guidelines as a resource for preparing the Draft IS/MND.

**Response C-2:** The District used the MBARD CEQA Air Quality Guidelines to assess air quality impacts as discussed in Section 4.3 in of the Draft IS/MND. The District will continue to use the MBARD CEQA Air Quality Guidelines to assess impacts for any future projects undertaken by the District. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment C-3:** The commenter notes that the North Central Coast Air Basin (“NCCAB”) is currently in attainment with California’s standards for ozone for the State’s 8-hour ozone threshold standard of 0.070 ppm as of February 2021. The commenter notes that information and maps of State and Federal Area Designations are available on the California Air Resources Board’s (“CARB”) website.

**Response C-3:** Comment acknowledged. The District has revised the text of the Draft IS/MND to note that the NCCAB is in attainment with California’s ozone standards as shown in **Chapter 3. Revisions to the Draft IS/MND.**

**Comment C-4:** The commenter provides the text of MBARD Rule 424, which includes notifications, project surveys, removal, and disposal of regulated asbestos containing materials (“RACM”) as well as adherence to the renovation and demolition procedures of existing structures. The commenter notes that MBARD Rule 424 could also apply if subsurface pipeline or conduit infrastructure, or other materials suspected of containing asbestos are encountered during construction activities, such as grading and trenching. The commenter notes that proper handling procedures must be utilized when development or other construction activities encounter, remove, and dispose of any active or abandoned asbestos cement pipe (“ACP”) or any other asbestos-containing subsurface infrastructure. The commenter provides contact information for MBARD staff in the event that District has questions regarding MBARD Rule 424.

**Response C-4:** Comment acknowledged. The Proposed Project includes some demolition of existing structures and site infrastructure. The District will ensure that all building demolition complies with the asbestos testing and handling procedures required as part of MBARD Rule 424. The text of the Draft IS/MND has been modified to more clearly state that demolition activities would comply with the requirements of MBARD Rule 424 as shown in **Chapter 3. Revisions to the Draft IS/MND.**

**Comment C-5:** The commenter notes that MBARD Rule 439 applies to all building removals, inclusive of “the deconstruction or demolition of any building” by either manual or mechanical means. The commenter notes that, in addition to the prohibition of visible emissions during building removals,

MBARD Rule 439 requires that structures are sufficiently wetted prior to removal and that wetting of structures must continue as necessary during demolition. In addition, the commenter notes that MBARD Rule 439 requires that structures be demolished inward toward building pads and that removal activities must cease when peak wind speed exceeds 15 miles per hour. The commenter provides contact information for MBARD staff in the event that District has questions regarding MBARD Rule 439.

**Response C-5:** Comment acknowledged. The Proposed Project includes some demolition of existing structures and site infrastructure. All building demolition would conform with the requirements of MBARD Rule 439. The text of the Draft IS/MND has been modified to more clearly state that demolition activities would comply with the requirements of MBARD Rule 439 as shown in **Chapter 3. Revisions to the Draft IS/MND.**

**Comment C-6:** The commenter recommends using cleaner than required construction equipment that conforms to CARB's Tier 3 or Tier 4 emission standards. The commenter also recommends that construction equipment use alternative fuels such as compressed natural gas ("CNG"), propane, electricity, or biodiesel to reduce diesel exhaust emissions, whenever feasible.

The commenter also notes that the use of a generator, boiler, or other stationary sources of air pollutants to support the construction process would require a permit from MBARD. In addition, the installation of one or more of these items for use in the operation of the Project would also be subject to MBARD permitting. In addition, the commenter notes that any stationary piston-type internal combustion engine of greater than or equal to 50 brake horsepower (bhp) requires an MBARD permit. The commenter provides contact information for MBARD staff in the event that District has questions regarding the MBARD permitting process.

**Response C-6:** The Draft IS/MND relied on air quality modeling conducted using CalEEMod. All construction emissions were found to be below their respective significance thresholds. In addition, the Project would implement MBARD's Best Management Practices to further reduce construction-period emissions. However, the District will encourage potential construction contractors to consider utilizing equipment that conforms to CARB's Tier 3 or Tier 4 emission standards. No changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

Section 1.10 of the Draft IS/MND lists Project-related approvals, permits, and clearances anticipated to be required, including a Permit to Operate from MBARD for the backup generator at the Bluff/Jensen Tank and Pump Station Site. No other new stationary sources of air pollutants are proposed as part of the Project. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

**Comment C-7:** The commenter notes that fugitive dust emissions require mitigation during the construction phase of the Project. The commenter notes that the Project's compliance with MBARD Rule 402 Nuisance and CEQA Guidelines Section 8.2 can be maintained by implementing feasible Mitigation Measures, such as:

- 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 2'0" 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).

**Response C-7:** The Draft IS/MND includes these suggested feasible actions, as well as several other actions, as Best Management Practices as noted on page 61 of the Draft IS/MND. As such, no changes to the analysis or conclusions in the Draft IS/MND are required as a result of this comment.

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## CHAPTER 3. REVISIONS TO THE DRAFT IS/MND

The District has modified the text of the Draft IS/MND (November 2025) as noted below. Page numbers of affected text are identified. The original text is presented first, and the revised text is presented second.

### Page 2, Section 1.2 Background

**Explanation:** The text has been revised to correct the number of connections being added under the Proposed Project and as part of the previous Springfield Water System Project.

**Original Text:** Water service in the project area is primarily provided by three (3) public water systems owned and operated by the District. The District currently has six (6) full-time staff holding water system operator certifications. These systems are the Pajaro Water System (“PWS”), the Sunny Mesa Water System (“SMWS”), and the Springfield Water System (“SWS”). The PWS has approximately 463 active connections, consisting of 358 residential connections and 105 commercial/industrial connections. The SMWS has approximately 268 active connections, consisting of 257 residential connections and 11 commercial connections. The SWS is currently involved in a design and construction project to expand the service area and improve the system reliability and water quality. The improved system will serve 161 residential connections and two (2) commercial/industrial connections. These improvements were part of a separate project and are not part of the Proposed Project. The Proposed Project would add a further 127 (22 individual homes and 105 mobile homes) connections to the SWS.

**Revised Text:** Water service in the project area is primarily provided by three (3) public water systems owned and operated by the District. The District currently has six (6) full-time staff holding water system operator certifications. These systems are the Pajaro Water System (“PWS”), the Sunny Mesa Water System (“SMWS”), and the Springfield Water System (“SWS”). The PWS has approximately 463 active connections, consisting of 358 residential connections and 105 commercial/industrial connections. The SMWS has approximately 268 active connections, consisting of 257 residential connections and 11 commercial connections. The SWS is currently involved in a design and construction project to expand the service area and improve the system reliability and water quality. The improved system would add a further 127 (22 individual homes and 105 mobile homes) and would serve a total 161 residential connections and two (2) commercial/industrial connections. These improvements were part of a separate project and are not part of the Proposed Project. The Proposed Project would add a further eight (8) connections to the SWS.

### Page 32, Section 1.7 Project Construction

**Explanation:** The text has been revised to reflect the most recent construction estimates.

**Original Text:** Construction of the Proposed Project will occur over two (2) major phases lasting 24-30 months. Construction activities associated with Phase 1 would last approximately 24 months. Construction activities associated with Phase 2 would last approximately 18 months. Project Phases are delineated based on availability of funding sources and construction of Project components may occur simultaneously between Phases.

**Revised Text:** Construction of the Proposed Project will occur over two (2) major phases lasting 24-30 months. Construction of Phase 1 of the Project is expected to begin in 2027 and conclude by early 2029,

for a total duration of 24 months. Construction for Phase 2 of the Project is expected to begin in 2027 and conclude by mid-2028, over a course of 20 months. Project Phases are delineated based on availability of funding sources and construction of Project components may occur simultaneously between Phases.

**Page 32, Section 1.7 Project Construction – Demolition Subheading**

**Explanation:** The text has been revised to clearly state that demolition activities will adhere to the requirements of MBARD rules for demolition and asbestos removal.

**Original Text:** The Proposed Project includes both well removal and demolition of existing structures on some of the Project Component sites. For the Iron and Manganese System installed at Pajaro Well No. 1 located at the District’s office at 136 San Juan Road, some existing well piping and other site equipment would be removed to make way for the site improvements. For the Transmission Booster Pump Station located off of Elkhorn Road at the existing SMWS well site, the Project would demolish the existing concrete pad underlying the generator, remove and replace the existing driveway, convert SMWS Wells No. 1 and No. 2 to standby operation, and destroy some above-grade infrastructure at the SMWS well site. Underground pipe components at this site will be removed or abandoned in place. Other demolition activities associated with the Proposed Project include destruction of wells in use by the various small and private water systems in the NOML area. Demolition waste would be disposed of in accordance with all applicable regulations at the Monterey Peninsula Landfill.

**Revised Text:** The Proposed Project includes both well removal and demolition of existing structures on some of the Project Component sites. For the Iron and Manganese System installed at Pajaro Well No. 1 located at the District’s office at 136 San Juan Road, some existing well piping and other site equipment would be removed to make way for the site improvements. For the Transmission Booster Pump Station located off of Elkhorn Road at the existing SMWS well site, the Project would demolish the existing concrete pad underlying the generator, remove and replace the existing driveway, convert SMWS Wells No. 1 and No. 2 to standby operation, and destroy some above-grade infrastructure at the SMWS well site. Underground pipe components at this site will be removed or abandoned in place. Other demolition activities associated with the Proposed Project include destruction of wells in use by the various small and private water systems in the NOML area. Demolition waste would be disposed of in accordance with all applicable regulations at the Monterey Peninsula Landfill.

All demolition would occur in compliance with MBARD rule 439, including prohibition of visible emissions during building removals, sufficiently wetting structures prior to removal and continuing wetting as necessary throughout demolition, demolishing structures inward toward building pads, and ceasing removal activities when peak wind speed exceeds 15 miles per hour. In addition, given the potential for asbestos containing materials due to the age of existing structures and infrastructure, the Project would comply with the requirements of MBARD Rule 424. Specifically, all suspect building materials, in each building, as well as subsurface pipeline, conduit infrastructure, or other materials suspected of containing asbestos, that will be disturbed by planned demolition shall be sampled and analyzed for asbestos using Polarized Light Microscopy. Any building materials found to be Regulated Asbestos Containing Materials (“RACM”) shall be removed from the site and disposed of in accordance with Title 22, Division 4.5, of the California Code of Regulations.

**Page 54, Section 4.3 Air Quality – Table 5. Attainment Status for the NCCAB**

**Explanation:** Table 5 has been revised to show that the NCCAB is currently in attainment with California’s standards for ozone.

**Original Text:**

**Table 5  
Attainment Status for the NCCAB**

<b>Pollutants</b>	<b>State Designation</b>	<b>Federal Designation</b>
Ozone (O <sub>3</sub> )	Nonattainment – Transitional	Attainment
Inhalable Particulates (PM <sub>10</sub> )	Nonattainment	Attainment
Fine Particulates (PM <sub>2.5</sub> )	Attainment	Attainment
Carbon Monoxide (CO)	Monterey Co. – Attainment	Attainment
Carbon Monoxide (CO)	San Benito Co. – Unclassified	Attainment
Carbon Monoxide (CO)	Santa Cruz Co. – Unclassified	Attainment
Nitrogen Dioxide (NO <sub>2</sub> )	Attainment	Attainment
Sulfur Dioxide (SO <sub>2</sub> )	Attainment	Attainment
Lead	Attainment	Attainment

Source: MBARD, 2017. 2012 – 2015 AQMP

**Revised Text:**

**Table 5  
Attainment Status for the NCCAB**

<b>Pollutants</b>	<b>State Designation</b>	<b>Federal Designation</b>
Ozone (O <sub>3</sub> )	Attainment	Attainment
Inhalable Particulates (PM <sub>10</sub> )	Nonattainment	Attainment
Fine Particulates (PM <sub>2.5</sub> )	Attainment	Attainment
Carbon Monoxide (CO)	Monterey Co. – Attainment	Attainment
Carbon Monoxide (CO)	San Benito Co. – Unclassified	Attainment
Carbon Monoxide (CO)	Santa Cruz Co. – Unclassified	Attainment
Nitrogen Dioxide (NO <sub>2</sub> )	Attainment	Attainment
Sulfur Dioxide (SO <sub>2</sub> )	Attainment	Attainment
Lead	Attainment	Attainment

Source: CARB, 2021

**Page 58, Section 4.3 Air Quality – Regulatory Framework - Local**

**Explanation:** The list of MBARD rules has been updated to include a description of Rule 439.

**Original Text:** To achieve and maintain AAQS, the MBARD has adopted various rules and regulations for the control of airborne pollutants. The applicable MBARD rules and regulations to the Proposed Project include, but are not limited to, the following:

- **Rule 402 (Nuisances).** The purpose of this rule is to prohibit emissions that may create a public nuisance. Applies to any source operation that emits or may emit air contaminants or other materials.
- **Rule 426 (Architectural Coatings).** The purpose of this rule is to limit emissions of volatile organic compounds from architectural coatings.

- **Rule 425 (Use of Cutback Asphalt).** The purpose of this rule is to limit emissions of vapors of organic compounds from the use of cutback and emulsified asphalt. This rule applies to the manufacture and use of cutback, slow cure, and emulsified asphalt during paving and maintenance operations.
- **Rule 424 (NESHAP-Asbestos).** Rule 424 adopts the National Emissions Standards for Hazardous Air Pollutants contained in the Code of Federal Regulations (40 CFR Part 61) pertaining to asbestos removal and building demolitions.

**Revised Text:** To achieve and maintain AAQS, the MBARD has adopted various rules and regulations for the control of airborne pollutants. The applicable MBARD rules and regulations to the Proposed Project include, but are not limited to, the following:

- **Rule 402 (Nuisances).** The purpose of this rule is to prohibit emissions that may create a public nuisance. Applies to any source operation that emits or may emit air contaminants or other materials.
- **Rule 426 (Architectural Coatings).** The purpose of this rule is to limit emissions of volatile organic compounds from architectural coatings.
- **Rule 425 (Use of Cutback Asphalt).** The purpose of this rule is to limit emissions of vapors of organic compounds from the use of cutback and emulsified asphalt. This rule applies to the manufacture and use of cutback, slow cure, and emulsified asphalt during paving and maintenance operations.
- **Rule 424 (NESHAP-Asbestos).** Rule 424 adopts the National Emissions Standards for Hazardous Air Pollutants contained in the Code of Federal Regulations (40 CFR Part 61) pertaining to asbestos removal and building demolitions.
- **Rule 439 (Building Removals).** Rule 439 sets specific requirements for the demolition of existing structures to limit particulate emissions associated with building removal.

**Page 62, Section 4.3 Air Quality – Impact Discussion – Impact c) – 2<sup>nd</sup> Paragraph**

**Explanation:** The text has been revised to refer to adherence to MBARD Rules 424 and 439.

**Original Text:** In addition, there are sensitive receptors located approximately 200 feet southwest of the Bluff/Jensen Tank and Pump Station site, approximately 300 feet southwest of the Transmission Booster Pump Station site, approximately 400 feet southeast (including both preschool and residential sensitive receptors) of the Pajaro Tank where site rehabilitation would occur, and immediately adjacent to the Iron and Manganese Treatment System to be installed at the existing Pajaro Well site. These components of the Proposed Project would result in construction activities being concentrated in single locations for longer periods of time than the pipeline components of the Proposed Project, which could result in increased concentrations of air quality pollutants. However, all air quality emissions for the construction period were found to be below their respective MBARD thresholds as described in **Appendix B**. In addition, the Proposed Project includes construction BMPs to reduce air quality emissions, and construction air quality emissions would be temporary in nature. Therefore, the Proposed Project would have a **less-than-significant construction impact** concerning the exposure of sensitive receptors to substantial pollutant concentrations.

**Revised Text:** In addition, there are sensitive receptors located approximately 200 feet southwest of the Bluff/Jensen Tank and Pump Station site, approximately 300 feet southwest of the Transmission Booster

Pump Station site, approximately 400 feet southeast (including both preschool and residential sensitive receptors) of the Pajaro Tank where site rehabilitation would occur, and immediately adjacent to the Iron and Manganese Treatment System to be installed at the existing Pajaro Well site. These components of the Proposed Project would result in construction activities being concentrated in single locations for longer periods of time than the pipeline components of the Proposed Project, which could result in increased concentrations of air quality pollutants. However, all air quality emissions for the construction period were found to be below their respective MBARD thresholds as described in **Appendix B**. In addition, the Proposed Project includes construction BMPs to reduce air quality emissions, and construction air quality emissions would be temporary in nature. Furthermore, the Project would adhere to the requirements of MBARD Rules 424 and 439 to prevent emissions, including potential asbestos release, during demolition activities. Therefore, the Proposed Project would have a **less-than-significant construction impact** concerning the exposure of sensitive receptors to substantial pollutant concentrations.

**Page 139, Section 4.9 Hazards and Hazardous Materials – Impact Discussion – Impacts and b) – 2<sup>nd</sup> Paragraph**

**Explanation:** The text has been revised to refer to MBARD Rule 424.

**Original Text:** Construction activities would require the temporary use of hazardous substances such as fuel and other petroleum-based products for operation of construction equipment, as well as oil and solvents. As a result, the Proposed Project could result in the exposure of persons and/or the environment to an adverse environmental impact due to the accidental release of a hazardous material. However, the transportation, use, handling, and disposal of hazardous materials would be temporary and would coincide with the short-term project construction activities. Further, handling of hazardous materials would be limited to the quantities and concentrations set forth by the manufacturer and/or applicable regulations, and all hazardous materials would be securely stored in a construction staging area or similar designated location within the Project site. In addition, the handling transport, use, and disposal of hazardous materials would comply with all applicable federal, state, and local agencies and regulations, including DTSC; Occupational Safety and Health Administration (“OSHA”); Caltrans; and the Monterey County Health Department - Hazardous Materials Management Services.

**Revised Text:** Construction activities would require the temporary use of hazardous substances such as fuel and other petroleum-based products for operation of construction equipment, as well as oil and solvents. In addition, due to the age of existing structures and infrastructure, demolition activities associated with the Proposed Project could potentially result in the release or disturbance of asbestos containing materials. As a result, the Proposed Project could result in the exposure of persons and/or the environment to an adverse environmental impact due to the accidental release of a hazardous material. However, the transportation, use, handling, and disposal of hazardous materials would be temporary and would coincide with the short-term project construction activities. Further, handling of hazardous materials would be limited to the quantities and concentrations set forth by the manufacturer and/or applicable regulations, and all hazardous materials would be securely stored in a construction staging area or similar designated location within the Project site. In addition, the handling transport, use, and disposal of hazardous materials would comply with all applicable federal, state, and local agencies and regulations, including DTSC; Occupational Safety and Health Administration (“OSHA”); Caltrans; and the Monterey County Health Department - Hazardous Materials Management Services.

Furthermore, all demolition activities would occur pursuant to the requirements of MBARD Rule 424, which requires sampling for asbestos from building materials to be removed, and, if asbestos is detected, appropriate disposal of asbestos containing materials.

**Page 201, Chapter 5. References - Bibliography**

**Explanation:** The new citation for Table 5 has been added to the bibliography.

**Original Text:** N/A

**Revised Text:** California Air Resources Board (“CARB”) (2021). *Proposed 2021 Amendments to Area Designations for State Ambient Air Quality Standards*. Available at:

<https://ww2.arb.ca.gov/rulemaking/2022/sad2022>

**ATTACHMENT A**  
**COMMENT LETTERS**

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## Letter A

**From:** [Amah Mutsun Tribal](#)  
**To:** [Robyn Simpson](#)  
**Subject:** Re: Notice of Availability/Notice of Intent to Adopt IS/MND for the Pajaro/Sunny Mesa Community Services District  
**Date:** Tuesday, November 18, 2025 3:02:44 PM  
**Attachments:** [General Recommendations \(1\) \(1\).pdf](#)  
[2025 Letter of Response for AMTB LLC.pdf](#)

---

Hello Robyn,

Thank you for the information on the proposed project, and please see the attached documents with our recommendations. If you have any questions about the attached documents, or would like to set up a meeting to discuss consultation, please give us a call at 650-851-7489 or email us at [amtbinc21@gmail.com](mailto:amtbinc21@gmail.com).

A-1

Thank you,

Lorelei Alli

On Tue, Nov 18, 2025 at 1:16 PM Robyn Simpson <[RSimpson@ddaplanning.com](mailto:RSimpson@ddaplanning.com)> wrote:

**The Amah Mutsun Tribal Band of San Juan Bautista &  
AMTB**

**Letter of Response**

**To whom it may concern:**

It is our pride and privilege to be of service for any Native American Cultural Resource Monitoring, Consulting and/ or Sensitivity Training you may need or require. We take our Heritage and History seriously and are diligent about preserving as much of it as we can. Construction is a constant in the Bay Area and with that new discoveries are bound to happen. If you choose our services, we will gladly guide all personnel through proper procedures to safely protect and preserve: Culture, Heritage, and History.

A-2

It is highly recommended, if not previously done, to search through Sacred Lands Files (SLF) and California Historical Resource Information Systems (CHRIS) as well as reaching out to the Native American Heritage Commission (NAHC) In order to determine whether you are working in a Cultural and/ or Historic sensitivity.

A-3

If you have received any positive cultural or historic sensitivity within 1 mile of the project area here are A.M.T.B Inc's and Amah Mutsun Tribal Band of San Juan Bautista's recommendations:

- All Crews, Individuals and Personnel who will be moving any earth be Cultural Sensitivity Trained.
- A Qualified California Trained Archaeological Monitor is present during any earth movement.
- A Qualified Native American Monitor is present during any earth movement.

A-4

If further Consultation, Monitoring or Sensitivity Training is needed please feel free to contact A.M.T.B. Inc. or Myself Directly. A.M.T.B. Inc. 650-851-7747

*Irenne Zwiierlein*

Irenne Zwiierlein

2451 Tyrolean Way, Sacramento CA  
95821

[amtbinc21@gmail.com](mailto:amtbinc21@gmail.com)

(650)851-7747

# Amah Mutsun Tribal Band of San Juan Bautista & AMTB

2451 Tyrolean Way, Sacramento CA 95821

Our rates for 2025 are

\$200.00 per hour.

4 hours minimum

Cancellations not 48 hours (about 2 days) prior will be charged as a 4-hour minimum. There is a round trip mileage charge if canceled after they have traveled to site.

Anything over 8 hours a day is charged as time and a half.

Weekends are charged at time and a half.

Holidays are charged at double the time.

For fiscal year (FY) 2025, standard per diem rate of \$425. (\$333. lodging, \$92 M&IE).

M&IE Breakdown FY 2025

M&IE Total	Continental Breakfast/Breakfast	Lunch	Dinner	Incidental Expenses	First & Last Day of Travel
\$92.00	\$23.00	\$26.00	\$38.00	\$5.00	\$69.00

Beginning 2025, the standard mileage rates for the use of a car round trip (also vans, pickups or panel trucks) will be: \$.70 cents per mile driven for business use or what the current federal standard is at the time.

Our Payment terms are 5 days from date on invoice.

Our Monitors are Members of the Amah Mutsun Tribal Band of Mission San Juan Bautista.

If you have any questions, please feel free to contact the A.M.T.B. Inc. at the below contact information.

Sincerely,

*Irenne Zwiierlein*

Irenne Zwiierlein

2451 Tyrolean Way, Sacramento CA  
95821

[amtbinc21@gmail.com](mailto:amtbinc21@gmail.com)

(650)851-7747



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)  
01/14/2025

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> ALLIED BROKERS INSURANCE AGCY INC 57101434 591 LYTTON AVENUE PALO ALTO CA 94301	<b>CONTACT NAME:</b>		
	<b>PHONE (A/C, No, Ext):</b> (866) 467-8730	<b>FAX (A/C, No):</b> (888) 443-6112	
	<b>E-MAIL ADDRESS:</b>		
<b>INSURER(S) AFFORDING COVERAGE</b>		<b>NAIC#</b>	
<b>INSURED</b> AMTB LLC 2451 TYROLEAN WAY SACRAMENTO CA 95821-4809	<b>INSURER A:</b> Hartford Underwriters Insurance Company		30104
	<b>INSURER B:</b>		
	<b>INSURER C:</b>		
	<b>INSURER D:</b>		
	<b>INSURER E:</b>		
	<b>INSURER F:</b>		

**COVERAGES****CERTIFICATE NUMBER:****REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/Y YYY)	LIMITS				
A	COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> General Liability			57 SBM BM9HAR	01/14/2025	01/14/2026	EACH OCCURRENCE	\$1,000,000			
	GEN'L AGGREGATE LIMIT APPLIES PER:										
	<input checked="" type="checkbox"/> POLICY	<input type="checkbox"/> PRO-JECT	<input type="checkbox"/> LOC								
	OTHER:										
A	<b>AUTOMOBILE LIABILITY</b>			57 SBM BM9HAR	01/14/2025	01/14/2026	COMBINED SINGLE LIMIT (Ea accident)	\$1,000,000			
	<input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input type="checkbox"/> AUTOS	<input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS									
	<b>UMBRELLA LIAB EXCESS LIAB</b>						EACH OCCURRENCE				
	<input type="checkbox"/> DED	<input type="checkbox"/> RETENTION \$					AGGREGATE				
	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b>						PER STATUTE	OTH-ER			
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	<input type="checkbox"/> Y/N	<input type="checkbox"/> N/A				E.L. EACH ACCIDENT				
							E.L. DISEASE -EA EMPLOYEE				
							E.L. DISEASE - POLICY LIMIT				

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

The Business Liability Coverage Part includes a Blanket Additional Insured By Contract Endorsement, Form SL 30 32.

**CERTIFICATE HOLDER****CANCELLATION**

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

*Susan L. Castaneda*

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## Provisions to Address Discovery of a Tribal Cultural Resource During Construction

Tribal Cultural Resources Sensitivity Training. The project sponsor, in consultation with any Cultural Resources Team if one is available, shall retain the services of an Ohlone Native American representative and/or archeological consultant from the Qualified List of Archaeological Consultants to provide cultural sensitivity and archeological awareness training to all work crews who will be involved in ground disturbing activities at the project site. The training shall inform all project contractors, subcontractors and work crew members to be on the alert for evidence of the presence of potential tribal cultural resource(s), of how to identify the evidence of such a resource(s), and of stop work, resource protection, and notification requirements in the event of suspected discovery of a tribal cultural resource by construction crew members.

A-5

Stop Work and Notification Upon Discovery. Should any indication of a tribal cultural resource be encountered during any soils-disturbing activity of the project, the project Head Foreperson and/or project sponsor shall immediately notify tribe and shall immediately suspend any soils-disturbing activities in the vicinity of the discovery until the Cultural Monitor and a qualified archeological consultant from the Qualified Archeological Consultants List have assessed the find and the respective parties have determined whether and what additional measures should be undertaken.

A-6

Preservation in Place. In the event of the discovery of a tribal cultural resource, the cultural resource team (if one is present on job), the project sponsor, the archeological consultant, and the Ohlone representative shall consult to determine whether preservation in place would be feasible and effective in preserving the values represented by the resource. The archeological consultant, in consultation with the Ohlone representative, shall document the find to current professional standards. The tribe may also require that the project sponsor immediately implement a site security program if the resource is at risk from vandalism, looting, or other damaging actions.

A-7

If it is determined that preservation-in-place of the tribal cultural resource would be both feasible and effective, the archeological consultant shall prepare a Resource Preservation Plan (RPP) in consultation with the Ohlone representative, for review, which shall be implemented by the project sponsor during construction.

If it is determined that preservation in place would not be feasible or effective, then archeological assessment and treatment shall be implemented and in consultation with the Ohlone representative, as detailed below.

Archeological Treatment. If it is determined, in consultation with the Ohlone representative and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option to preserve the values represented by the resource, then the archeological consultant, in consultation with the Ohlone representative, shall conduct archeological assessment to determine

A-8



the significance of the find and determine whether it retains sufficient integrity to warrant additional treatment. If the tribal cultural resource is determined to be a significant archeological resource, the archeological consultant, in consultation with the Ohlone representative, shall recommend appropriate archeological treatment to preserve the data and values of the tribal cultural resource, which may include archeological data recovery. Data recovery shall be implemented in consultation with the Ohlone representative and shall include appropriate analyses and reporting. If an archeological interpretive, monitoring, and/or testing program is required, it shall be consistent with Standard guidelines for such programs and shall be implemented immediately.

A-8  
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Human Remains and Funerary Objects. The treatment of any human remains, and funerary objects discovered during any soils disturbing activity shall comply with applicable State laws, including Section 7050.5 of the Health and Safety Code and Public Resources Code 5097.98. If human remains or suspected human remains are encountered during construction, the contractor and project sponsor shall ensure that ground-disturbing work within 50 feet of the remains is halted immediately and shall arrange for the protection in place of the remains until appropriate treatment and disposition have been agreed upon and implemented in accordance with this section. The project sponsor shall immediately notify the Medical Examiner of the County in which the job resides and the Tribe of the find. In the event of the Medical Examiner's determination that the human remains are Native American in origin, the Medical Examiner will notify the California State Native American Heritage Commission (NAHC) within 24 hours and all provisions of Public Resources Code 5097.98 will be followed.

A-9

Interpretive Program. If it is determined, in consultation with Ohlone representative and the project sponsor, determines that preservation-in-place of the tribal cultural resource is not a sufficient or feasible option, the project sponsor, in consultation with local Native American representatives, shall prepare a Cultural Resources Public Interpretation Plan (CRPIP) to guide the interpretive program. The CRPIP shall be submitted for review and approval prior to implementation of the program. The interpretive program may but is not limited to artist installations, preferably by local Native American artists, oral histories with local Native Americans, cultural displays, educational panels, or other interpretive elements agreed upon by the sponsor, and Ohlone Native American representatives, and shall include an on-site acknowledgement that the project is built on traditional Ohlone land. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. Upon approval of the CRPIP and prior to project occupancy, the interpretive program shall be implemented by the project sponsor. The project sponsor shall work with the tribal representative to identify the scope of work by the tribal representative to fulfill the requirements of this mitigation measure, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Tribal representatives shall be compensated for their work as identified in the agreed upon scope of work.

A-10

# California Department of Transportation



CALTRANS DISTRICT 5  
50 HIGUERA STREET | SAN LUIS OBISPO, CA 93401-5415  
(805) 549-3101 | FAX (805) 549-3329 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)

December 17, 2025

Mon-1-Variou  
SCH # 2025110647

Judith Vazquez-Varela, General Manager  
Pajaro/Sunny Mesa Community Services District  
136 San Juan Road  
Royal Oaks, CA 95076

Dear Ms. Vazques-Varela:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Initial Study/Mitigated Negative Declaration (MND) for the Pajaro/Sunny Mesa – Springfield Area Regional Consolidation Project. The Project proposes a two-phased consolidation of various water systems into a single water system. The water systems run along and across the State Highway System (SHS) and work is proposed within the states right of way in some areas.

Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development.

Caltrans offers the following comments in response to the MND:

### Traffic Operations and Safety:

- Work within the State Right-of-Way will require a Caltrans Encroachment Permit, including establishment of construction staging areas.
- If construction staging for proposed Project is permitted within the states right of way, all materials shall be stored outside of the Clear Recovery Zone.

### Permits:

- Please be aware that if any work is completed in the State's right-of-way it will require an encroachment permit from Caltrans, and must be done to our engineering and environmental standards, and at no cost to the State. The standards detailed in the Caltrans Encroachment Permit Manual should be followed. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and

B-1

B-2

B-3

B-4

nothing in this letter shall be implied as limiting those future conditions and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at:

<https://dot.ca.gov/programs/traffic-operations/ep/applications>.

- When the application package is complete, it may either be emailed to [d5.permits@dot.ca.gov](mailto:d5.permits@dot.ca.gov) or submitted through the Caltrans Encroachment Permit System (CEPS) public portal.

↑  
B-4  
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B-5

Thank you for the opportunity to review and comment on the proposed project. If you have any questions or need further clarification on the items discussed above, please contact me at (805) 835-6555 or email [ingrid.mcroberts@dot.ca.gov](mailto:ingrid.mcroberts@dot.ca.gov).

Sincerely,

*Ingrid McRoberts*

Ingrid McRoberts  
Caltrans District 5  
Local Development Review Coordinator



December 17, 2025

Judith Vazquez-Varela, General Manager  
136 San Juan Road, Royal Oaks, CA 95076  
Submitted via email: [judyvazquez@pajarosunnymesa.com](mailto:judyvazquez@pajarosunnymesa.com)

Re: Pajaro/Sunny Mesa Springfield Area Regional Consolidation Project

Dear Ms. Vazquez-Varela,

Thank you for providing the Monterey Bay Air Resources District (MBARD) with the opportunity to comment on the Notice of Availability/Notice of Intent (NOA/NOI) to adopt a Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Pajaro/Sunny Mesa Springfield Area Regional Consolidation Project. MBARD has reviewed this MND and has the following comments:

C-1

**CEQA Guidelines**

MBARD recommends the Pajaro/Sunny Mesa Community Service District (District) to continue utilizing the [MBARD CEQA Air Quality Guidelines](#) as a resource for preparing the Draft IS/MND.

C-2

**North Central Coast Air Basin (NCCAB) Attainment Status**

The North Central Coast Air Basin (NCCAB) is currently in attainment with California’s standards for ozone. The NCCAB has been in attainment since February 2021 for the State’s 8-hour ozone threshold standard of 0.070 ppm. [Additional information](#) and [maps of State and Federal Area Designations](#) are available on California Air Resources Board’s (CARB) website.

C-3

**Rule 424 National Emission Standards for Hazardous Air Pollutants (NESHAP)**

Rule 424 states, “All suspect building materials, in each building, that will be disturbed by planned demolition or renovation activities shall be sampled and analyzed for asbestos using the method specified in Appendix E, Subpart E, 40 Code of Federal Regulations, Part 763, Section 1 (Polarized Light Microscopy) or assumed to be asbestos containing. Suspect materials include, friable asbestos-containing material, Category I nonfriable asbestos-containing material, Category II nonfriable asbestos-containing material or any other material that may contain asbestos, based on past manufacturing practices or use”. Rule 424 includes notifications, project surveys, removal, and disposal of regulated asbestos containing materials (RACM) as well as adherence to the renovation and demolition procedures.

C-4

Rule 424 could also apply if subsurface pipeline or conduit infrastructure, or other materials suspected of containing asbestos are encountered during construction activities, such as grading and trenching. Proper handling procedures must be utilized when development or other construction activities encounter,



remove, and dispose of any active or abandoned asbestos cement pipe (ACP) or any other asbestos-containing subsurface infrastructure.

For assistance regarding this regulation, please contact Bronwyn Nielson, Air Quality Inspector, at (831) 718-8024 [bnielson@mbard.org](mailto:bnielson@mbard.org) for more information regarding this rule.

C-4  
Con't

### **Rule 439 Building Removals**

Rule 439 applies to all building removals, or “the deconstruction or demolition of any building” by either manual or mechanical means. In addition to the prohibition of visible emissions during building removals, the following work practice standards are required: structures must be sufficiently wet prior to removal and wetting must continue as necessary, demolish structures inward toward building pads, and cease removal activities when peak wind speed exceeds 15 miles per hour.

C-5

For assistance regarding this regulation, please contact Bronwyn Nielson, Air Quality Inspector, at (831) 718-8024 [bnielson@mbard.org](mailto:bnielson@mbard.org) for more information regarding this rule.

### **Construction Emissions and Permits**

MBARD recommends using cleaner than required construction equipment that conforms to CARB’s Tier 3 or Tier 4 emission standards. MBARD also recommends, whenever feasible, construction equipment use alternative fuels such as compressed natural gas (CNG), propane, electricity, or biodiesel to reduce diesel exhaust emissions.

If a generator, boiler, or other stationary sources of air pollutants are needed to support the construction process or will be installed for use in the operation of the project, a permit may be required. 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) 647-9411 if there are any questions regarding the permitting process.

C-6

### **Rule 402 Nuisances**

Fugitive dust should be mitigated during the construction phase of the project. Compliance with MBARD Rule 402 Nuisance and CEQA Guidelines Section 8.2 can be maintained by implementing feasible Mitigation Measures, such as:

- 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 2’0” 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).

C-7

MBARD appreciates the opportunity to comment on the NOA/NOI to adopt a Draft IS/MND for the Pajaro/Sunny Mesa Springfield Area Regional Consolidation Project. Please let me know if you have any questions. I may be reached at (831) 718-8021 or [tbell@mbard.org](mailto:tbell@mbard.org).

Regards,

A handwritten signature in black ink, appearing to read 'Tyrone Bell', with a stylized flourish at the end.

Tyrone Bell  
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

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