

Exhibit F

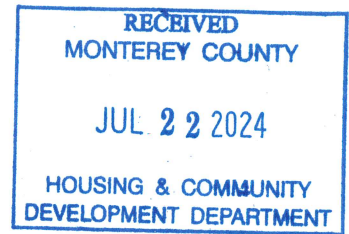
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PLN210306

Friedrich, Michele

From: Deborah Castles <Deborah@alombardolaw.com>
Sent: Monday, July 22, 2024 10:35 AM
To: Israel, Mary
Cc: Gail Hatter
Subject: PLN210306
Attachments: L-Israel_07.1924_w Encl.pdf

Follow Up Flag: Follow up
Flag Status: Flagged



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Dear Mary:

Please disregard the email that was sent to you on Friday by Paul Parker. The letter delivered to you with our firm's comments on the MND (and attached hereto) is our submittal. Please let us know if additional comments are posted on this matter. Thank you, Deborah Castles

Deborah M. Castles
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PLN210306

ANTHONY LOMBARDO & ASSOCIATES

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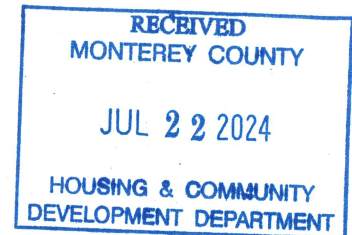
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July 19, 2024

Our File No.: 5556.000

Mary Israel
Supervising Planner
Monterey County HCD
1441 Schilling Place – 2nd Floor South
Salinas, CA 93901



Re: Carmel Self Storage Investments LLC (PLN210306)
Comments to Mitigated Negative Declaration

Dear Ms. Israel:

Our office represents Carmel Self Storage Investments LLC with respect to the application to obtain entitlements described in PLN210306. We have reviewed the Mitigated Negative Declaration (MND) filed by the County on June 21, 2024 and offer the following comments as well as the comments of Denise Duffy & Associates, Inc. in letter dated June 27, 2024 (Attachment A):

1. **Aesthetics: Discussion/Conclusion/Mitigation, (pg.19):** The word “character” should be substituted for “charter” in the last line of p.19.
2. **Biological Resources 4 (a), (pg. 28) and Mitigation Measures BIO-4, (Page 31):** The impact analysis and associated mitigation refer to western pond turtle (WPT) and “other special status reptiles”. The MND is unclear on what other special status reptiles may occur and how they will be impacted. The only special status reptile species the Biological Resource Report identified with the potential to occur within the site and impacted by the project is the WPT. This issue should be clarified with either an identification by the County what other special status reptile species may be impacted or removal of the reference to “other special status reptiles”.
3. **Mitigation monitoring Action BIO-2.2, (pg. 30):** This monitoring action identifies preconstruction surveys should follow the *Revised Guidance for CRLF Site Assessment and Field Surgery (USFWS, 2005)*. However, this survey protocol is intended to assess potential habitat and presence/absence of CRLF and does not provide guidance on pre-construction surveys. Because the preconstruction surveys and site assessments are two separate actions, we recommend that the County revise this measure to state that the “results of the habitat assessment

conducted in accordance with the *Revised Guidance for CRLF Site Assessment and Field Survey (USFWS, 2005)*” and “the results of the pre-construction surveys” shall be submitted to HCD and other required agencies.

4. **Mitigation Monitoring Action BIO-2.3, (pg. 30), 4.2, 4.3 (pg. 32), and 5.1 (pg. 35):** The mitigation monitoring actions state that reporting of monitoring results shall be sent to the County “either at the end of two weeks or at the end of every month of ground disturbing and vegetation removal activities “contingent on the rate of construction activity as determined by the construction timeline.” We recommend that the County clarify how the frequency of reporting would be determined so that there is no confusion as to whether reporting every two weeks or monthly is required.

5. **Mitigation Monitoring Action BIO-4.3, (pg. 32) and 5.1 (pg. 35):** These monitoring actions state that the “qualified biologist and construction monitor shall submit a daily log” to the County.” However, the text later provides that the monitoring reports would be either every two weeks or monthly. We recommend that the MND be clarified to be specific that qualified biologist and construction monitor keep daily logs and submit them to the County monthly. (See comment 4, above).

6. **Page 32, Third Paragraph:** Please add the following to the last sentence of paragraph 4 “and therefore the project would result in less than significant impacts. *Impacts would be less than significant.*”

7. **Biological Resources 4(b), (pg. 33):** The MND states that a standard condition of approval shall be imposed on the project requiring “a contiguous area of the .4 acre within the 100 feet of riparian habitat to be included in the conservation easement”. The MND does not cite the authority in the County Code or adopted policy which makes this a “standard condition.” The MND does not specify the proposed size and location of this area which is in addition to the 786 square feet of land set aside as a preserve for the WPT (“WPT Preserve”). The Biological Resources Report does not recommend the set aside of land in addition to the WPT Preserve to protect riparian habitat and concluded that the project “will not have a significant adverse impact on the long-term maintenance of the riparian habitat” (see Biological Resources Report, pg. 15). In addition, the project has been modified to satisfy the requirements of Section 21.66.020 (D) (3) of the County Code which provides:

“Removal of indigenous vegetation and land disturbance, such as grading, excavation, paving, and fill, in or within one hundred (100) feet of environmentally sensitive habitats shall be limited to that necessary for the structural improvements and driveway access. Modifications to the proposal shall be made for siting, location, design, bulk, vegetation removal, and grading where such modifications will reduce impacts to the habitat.”

We are not aware of any other Code Section or adopted policy which requires a “contiguous area of the .4 acre within the 100 feet of riparian habitat” to be set aside. Based on the modifications to the project and the permanent fencing that will separate the project from the remainder of the property that is within the 100’ buffer, we believe that adequate mitigation has been provided to protect the riparian habitat.

8. **Mitigation Monitoring Action 5.1, (Pg. 35):** The mitigation monitoring action should refer to on-going riparian habitat environmental compliance and not on-going WPT environmental compliance.

9. **Mitigation Measure CR-1, (pg.38):** The Phase II Archaeological Assessment referenced in the MND recommends (i) that a tribal monitor be included in the cultural awareness and response training for construction field staffs responsible for tree removal, major vegetation removal, grading or excavation and (ii) that the training be provided to all new personnel engaged in the work described in (i) above, during the life of the project. We recommend that Mitigation Measure CR-1 be amended as follows (see italicized language):

“To reduce potential impacts to cultural resources that may be discovered during development of the site, a qualified archaeologist *and tribal monitor* shall conduct a cultural resource awareness and response training for the construction field staffs that conduct any tree removal, major vegetation removal, grading or excavation activities. The training shall include a description of the kinds of cultural and tribal cultural resources that are found in the area, protocols to be used in the event of an unanticipated discovery, and the importance of cultural resources to the Native American community. The training shall occur within one month of the construction/tree removal activities. *The training shall be provided to field staff personnel who commence employment after the initial training is concluded.* After training, the archaeologist shall also monitor the site. The archaeological monitor 1 A Phase III report includes a plan for the treatment of uncovered archaeological resources with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource. Carmel Self-Storage Project Page 39 PLN210306 shall be present during soil disturbance for all grading and excavation described in the Phase 2 report as having a potential to contain resources. (Neither excavations into hardpan and bedrock nor backfilling, off hauling of soils, nor processing of previously excavated soils shall require monitoring.) The archaeologist shall be authorized to stop work in the event resources are found

10. **Mitigation Monitoring Action CR-2.3, (pg. 40):** We request that the first sentence in CR2.3 be amended to provide, “**In the event that resources are impacted**”, the archaeologist will contact the planner immediately.

Ms. Israel
Monterey County HCD
July 19, 2024
Page | 4

11. **Mitigation Monitoring Action CR-2.4, (pg. 40):** We request that the MND be amended to require the qualified archeologist and the tribal monitor to make the assessment of the extent of the uncovered resources within one week of the site visit with the project planner.

12. **Geology and Soils, (pg. 43):** The box for 7e should be checked as No Impact to be consistent with Section 7(e) on Page 46.

13. **Transportation 17(b) (pg.66):** Applicant accepts the trip generation rate for the project developed by Rick Engineering Company in its Center Street Self-Storage Facility Traffic Assessment (January 30, 2024) and applied by the County calculation of the Carmel Valley Development Impact Fee that is included in the MND.

It is our opinion that the changes requested in this letter do not rise to the level of requiring recirculation of the MND. Recirculation is only required when there is a substantial revision to the MND that identifies a “new unavoidable significant impact” or “the lead agency (finds) the proposed mitigations measures will not reduce impacts to an insignificant level” (CEQA Guidelines Section 15073.5(b)).

Please feel free to call us if you need additional information. We hope these comments are helpful.

Sincerely,



Deborah M. Castles

Enclosure

cc: Anthony Lombardo
Gail Hatter
William Tucker
Paul Parker



Denise Duffy & Associates, Inc.
PLANNING AND ENVIRONMENTAL CONSULTING

June 27, 2024

Will Tucker
385 Dane Lane
Templeton, CA 93463

Subject: Carmel Self Storage Investments Project – Initial Study/Mitigated Negative Declaration Review Comments

Mr. Tucker,

I have reviewed the Biological Resources analysis included in the Initial Study/Mitigated Negative Declaration (IS/MND) prepared by the County of Monterey for the Carmel Self Storage Investments Project. The majority of the analysis and measures provided are consistent with the information and recommendations provided in the Biological Resources Report that Denise Duffy & Associates (DD&A) prepared for the project. There are a few statements and measures that I recommend clarifying with the County prior to preparation of the Final IS/MND:

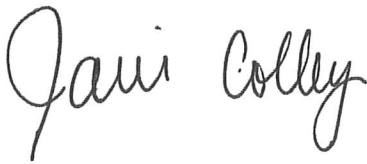
- **Biological Resources 4(a) (Page 28) and Mitigation Measures BIO-4 (Page 31):** The impact analysis and associated mitigation refer to western pond turtle (WPT) and “other special status reptiles.” The IS/MND is unclear on what other special-status reptiles may occur and how they may be impacted. The only special-status reptile species the Biological Resources Report identified with the potential to occur within the site and be impacted by the project is WPT. I recommend that the County identify what other special-status reptile species may be impacted by the project, or remove the vague language.
- **Mitigation Monitoring Action BIO-2.2:** This monitoring action identifies that pre-construction surveys should follow the *Revised Guidance for CRLF Site Assessment and Field Survey (USFWS, 2005)*. However, this survey protocol is intended only to assess potential habitat and determine presence/absence of CRLF and does not provide guidance on “pre-construction” surveys. I recommended that the County revise this measure to state that the “results of the habitat assessment conducted in accordance with the *Revised Guidance for CRLF Site Assessment and Field Survey (USFWS, 2005)*” and the “results of the pre-construction surveys” shall be submitted to HCD and other required agencies as these are two separate actions.
- **Mitigation Monitoring Actions BIO-2.3 (page 30), 4.2, 4.3 (Page 32), and 5.1 (Page 35):** These monitoring actions state that reporting of monitoring results shall be sent to the County “either at the end of every two weeks or at the end of every month of ground disturbing and vegetation removal activities” “contingent on the rate of construction activity as determine by the construction timeline.” I recommend the County clarify how the frequency of reporting would be determined. It is unclear to me the triggers for reporting every two weeks vs. reporting monthly.
- **Mitigation Monitoring Action BIO-4.3 (Page 32), and 5.1 (Page 35):** These monitoring actions state that the “qualified biologist and the construction monitor shall submit a daily log” to the County; however, the following sentences state that monitoring reports would be submitted every two weeks or at the end of every month. I recommend the County clarify that the qualified biologist and

constriction monitor will “keep” or “record” a daily log, and that monitoring reports that include the daily log will be provided to the County on a clarified timeline (see comment above).

- **Mitigation Monitoring Action 5.1 (Page 35):** This monitoring action incorrectly refers to providing the results of on-going WPT environmental compliance instead of on-going riparian habitat environmental compliance.

The comments above are all clarifying and are unlikely to result in the identification of any new impacts or require any new mitigation, and are therefore unlikely to require recirculation of the public document. Please note that this is not intended to be an official comment letter on the environmental document but to provide you guidance on discussions with the County. I am also available to coordinate with the County directly as your representative if requested. If you have any questions or concerns regarding these comments and recommendations, please feel free to reach out.

Sincerely,

A handwritten signature in black ink that reads "Jami Colley". The signature is written in a cursive, flowing style.

Jami Colley
Senior Environmental Scientist
(831) 373-4341 x24
jcolley@ddaplanning.com

PLN210306

Friedrich, Michele

From: Irene Miranda <imiranda@mbard.org>
Sent: Monday, July 22, 2024 2:06 PM
To: ceqacomment
Cc: Richard Stedman; David Frisbey; Shawn Boyle
Subject: Carmel Self Storage Investments LLC Mitigated Negative Declaration - Attn: Mary Israel
Attachments: MBARD Comments Monterey Co - Carmel Self Storage project.pdf

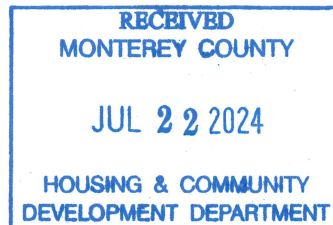
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Dear Ms. Israel,

Thank you for providing Monterey Bay Air Resources (MBARD) with the opportunity to comment on the Carmel Self Storage Investments LLC Mitigated Negative Declaration. Attached is MBARD's review letter. Please feel free to contact me if you have any questions.

Best regards,
Irene Miranda

Irene Miranda, Ph.D., Air Quality Planner
Monterey Bay Air Resources District
24580 Silver Cloud Court, Monterey, CA 93940
Office 831-647-9411 Direct 831-718-8021
imiranda@mbard.org
www.mbard.org



July 22, 2024

Monterey County
Housing & Community Development
Attention: Mary Israel
1441 Schilling Place South, 2nd Floor
Salinas, CA 93901

Submitted as hard copy to physical address and via email: CEQAcomments@co.monterey.ca.us

Re: Carmel Self Storage Investments LLC Mitigated Negative Declaration

Dear County of Monterey,

Thank you for providing the Monterey Bay Air Resources District (MBARD) with the opportunity to comment on the Carmel Self Storage Investments LLC Mitigated Negative Declaration (MND). MBARD has reviewed the MND and has the following comments:

Asbestos Cement Pipe (ACP) and other sub-surface asbestos Infrastructure

The project's 2.06 acre undeveloped site will be excavated to a depth of four feet. Proper procedures must be taken when encountering any active or abandoned ACP or other asbestos-containing subsurface infrastructure. Grading and trenching activities in particular can disturb ACPs and release fibrous material, exposing sensitive receptors. If ACP or other sub-surface asbestos material are encountered, please follow proper procedures including notification, removal, and disposal of regulated asbestos containing materials per MBARD Rule 424. Rule 424 can be found online at <https://ww2.arb.ca.gov/current-air-district-rules>. Please contact Bronwyn Nielson, Air Quality Compliance Inspector, at 831-718-8024 for more information regarding these rules.

Air Quality

- Fugitive Dust Control

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 the following Best Management Practices as applicable:

- 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).

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. We further recommend that whenever feasible, construction equipment use alternative fuels such as compressed natural gas (CNG), propane, electricity, or biodiesel. This would have the added benefit of reducing diesel exhaust emissions.

Portable or Stationary Engines

If a generator, boiler, or another stationary source of air pollutants is needed to support the construction process or will be installed for use in the operation of the project, a permit may be required. Per MBARD Rule 201, any stationary piston-type internal combustion engine of greater than or equal to 50 brake horsepower (bhp) requires an MBARD Permit to Operate. Please contact MBARD's Engineering Division if there are any questions regarding the permitting process.

Portable Equipment Registration Program

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

Transportation Emissions

- Electrical Vehicle Charging Stations

- Due to the construction of the self-storage facility that will bring site attendees, MBARD supports incorporating electric vehicle infrastructure goals in the project plan. To achieve further emission reduction of criteria pollutants, emissions and greenhouse gases, MBARD suggests including publicly available dual port Level 2 & DC fast-charge charging stations in the facility parking areas as part of the project.

We appreciate the opportunity to comment on the Carmel Self Storage Investments LLC Mitigated Negative Declaration. Please let me know if you have any questions. You can reach me at 831-718-8021.

Best regards,

Irene Miranda

Irene Miranda, Ph.D.
Air Quality Planner I

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