

CATEGORICAL EXEMPTION REPORT

This report serves as the technical documentation of environmental analysis performed by Rincon Consultants, Inc., for the proposed Capital One Building Occupancy Project (“the project”). The intent of the analysis is to confirm that the proposed project is eligible for a Class 1 (a) and (l) Categorical Exemption (CE) under the California Environmental Quality Act (CEQA). The following report provides an introduction, project description, and evaluation of the project’s consistency with the requirements for a Class 1 exemption. This includes an analysis of the project’s potential to result in a significant impact due to unusual circumstances. The report concludes that the project is eligible for the Class 1 Exemption, as it would not include any major construction, renovations, or new uses.

1.0 INTRODUCTION

The County of Monterey has determined that a Class 1 Categorical Exemption (CE) is applicable to the proposed Capital One Building Occupancy Project. The State CEQA Guidelines Section 15301 (Class 1) states that a CE is allowed when:

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion or use beyond that existing at the time of the lead agency’s determination...The key consideration is whether the project involves negligible or no expansion of an existing use.

The relevant type of project included in Class 1 Categorical Exemptions is defined in Section 15301 as follows:

- a) *Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances*
- l) *Demolition and removal of individual small structures*

Rincon Consultants, Inc. evaluated the project’s consistency with the above requirements, including its potential to result in a significant impact due to unusual circumstances to confirm the project’s eligibility for the Class 1 exemption.

2.0 PROJECT DESCRIPTION

On August 26, 2014, the County of Monterey Board of Supervisors approved the purchase of the former Capital One building, located at 1441, 1448, and 1494 Schilling Place in Salinas. The site, also referred to as the Schilling Place complex, was previously used by Capital One as offices for approximately 800 employees. In 2013, Capital One closed the office, leaving the building vacant.

The site is zoned Industrial – Business Park and surrounding zoning includes Industrial – Business Park and Industrial – General. Surrounding land uses include industrial/business park uses to the north, west, and south. To the east of the site is U.S. Highway 101 with



agricultural land beyond. Agricultural uses also are located approximately 900 feet to the south and east of the project site, bordering the industrial uses.

The proposed project would include interior improvements and modifications to the existing Schilling Place complex and relocation of up to 450 County staff persons to the newly acquired and renovated facility. The improvements and modifications would include new hardwall spaces, the re-routing of HVAC supply/return, and the repositioning of lights. The majority of the work would consist of reconfigurations of the existing workstation cubicles within the building. Painting and carpet replacement would also occur. However, no major structural improvements or additions to the existing complex are proposed.

After internal modifications are complete, up to 450 County staff would relocate from existing County office buildings to the newly acquired property. Approximately 40 staff would be relocated to the building by April 1, 2015 and another 410 staff would relocate to the Schilling Place complex by early 2017. This occupancy is based on existing staff as well as projections for future County employment growth, which is not dependent upon the acquisition of the Capital One property. Table 1 presents the number of employees from each department that would be relocated, the date of relocation, and the current address from which they would relocate.

**Table 1
 Employees, Current Location, and Relocation Dates**

Department	Current Location	Approximate Date of Relocation	Existing Number of Employees	Projected Future Number of Employees
RMA Administration	168 West Alisal Street	12/2016 – 1/2017	33	35
RMA Building Services	168 West Alisal Street	12/2016 – 1/2017	32	35
RMA Planning	168 West Alisal Street	12/2016 – 1/2017	35	38
RMA Public Works	168 West Alisal Street	12/2016 – 1/2017	42	45
Equal Opportunity Office	168 West Alisal Street	12/2016 – 1/2017	6	7
Grand Jury	2620 1 st Avenue, Marina	12/2016 – 1/2017	20	20
Learning/Development	230 Church Street	12/2016 – 1/2017	8	10
Human Resources	168 West Alisal Street	12/2016 – 1/2017	28	35
Economic Development	168 West Alisal Street	12/2016 – 1/2017	8	9
Contracts/Purchasing	168 West Alisal Street	March 2015	7	10
Enterprise Resource Planning	168 West Alisal Street	12/2016 – 1/2017	20	0
Health- IQ	1611-15 Bunker Hill Road	12/2016 – 1/2017	17	20
Health – Business Office	1611-15 Bunker Hill Road	12/2016 – 1/2017	13	28
Health – Administration	1611-15 Bunker Hill Road	12/2016 – 1/2017	16	19
Health – Call Center	1611-15 Bunker Hill Road	12/2016 – 1/2017	10	15



**Table 1
 Employees, Current Location, and Relocation Dates**

Department	Current Location	Approximate Date of Relocation	Existing Number of Employees	Projected Future Number of Employees
Health – Emergency Medical Services	1611-15 Bunker Hill Road	12/2016 – 1/2017	45	45
Health – unit name unknown	1611-15 Bunker Hill Road	12/2016 – 1/2017	7	7
Water Resources	893 Blanco Circle	12/2016 – 1/2017	29	32
Social Services – Files/Supplies	815 Market	3/2015	5	5
Social Services – Copy Center	815 Market	3/2015	10	10
Records Retention	1610 Moffett Street	3/2015	4	5
Elections	1370 Main Street	12/2016 – 1/2017	12	15
Supervisor Salinas	168 West Alisal Street	12/2016 – 1/2017	5	5
TOTALS			412	450

168 West Alisal Street is a County-owned building located at the Government Center Campus. The second floor of this building would be vacated as a result of this project. It is anticipated that this space would then be backfilled by the District Attorney’s office, which currently occupies two modular buildings elsewhere on the Government Center Campus. Those modular buildings would be disposed of. A third modular building, located at 230 Church Street (also on the Government Center Campus), would also be disposed of after Learning/Development staff are relocated to the Schilling Place complex.

2620 1st Avenue in Marina is also a County-owned building. The Grand Jury currently occupies a small portion of this building (2,500 square feet) and other Monterey County agencies occupy the rest. These various agencies would continue to occupy this County-owned building.

In addition, as a result of County staff relocation, the following leased buildings would be vacated and therefore become available for leasing on the open market: 1611-15 Bunker Hill Road, 893 Blanco Circle, 1610 Moffett Street, 815 Market, and 1370 South Main Street. The space at 815 West Market Street – currently used as file/supply storage and a copy center – is a warehouse space located adjacent to an existing food bank. It is anticipated that the food bank would expand into the space currently utilized by the County.



3.0 CATEGORICAL EXEMPTION CONSISTENCY ANALYSIS

The following provides an evaluation of the project's consistency with the requirements for a Class 1 exemption. To be eligible for a Class 1(a) exemption, the project must consist of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination (CEQA Guidelines Section 15301[a]). The key consideration is whether the project involves negligible or no expansion of an existing use. For a Class 1(a) exemption, the project must only include interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances [Section 15301(a)].

In addition, demolition associated with the project (i.e. the removal of three existing modular buildings) would need to comply with Section 15301(l), which allows for the removal and demolition of accessory (appurtenant) structures such as garages, carports, and fences.

Further, in accordance with Section 15300.2 of the State CEQA Guidelines, a categorical exemption shall not be used in the following instances:

- When the cumulative impact of successive projects of the same type in the same place, over time is significant;
- When there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances;
- When a project may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway;
- When a project is located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code; and/or
- When a project may cause a substantial adverse change in the significance of a historical resource.

Thus, to qualify for an exemption, the project must not result in a cumulative impact, result in a significant effect on the environment due to unusual circumstances, result in damage to scenic resources within an officially designated state scenic highway, be located on a hazardous material site, or impact a historical resource.

The project includes internal modifications to the existing Schilling Place complex and relocation of up to 450 County staff persons to the newly acquired and renovated facility. Internal modifications would include new hardwall spaces, the re-routing of HVAC supply/return, and the repositioning of lights. Painting and carpet replacement would also occur. However, no major structural improvements or additions to the existing complex are proposed. There would not be any ground disturbance, any changes in land use, or any other changes to the physical environment. As a result, the project would generally fulfill the requirements of a Class 1(a) exemption. The three existing structures that would be removed as a result of the project are modular structures located on the Government Center Campus. These structures are considered as accessory (appurtenant) to the government center use. Therefore, removal of these structures would qualify for a Class 1(l) exemption.



Because the project would not result in ground disturbance or other changes to the physical environment, it would have no effect on ground-disturbance related environmental impacts, such as agricultural resources, biological resources, cultural (archaeological) resources, geology and soils, and hydrology and water quality. The existing Schilling Place complex was constructed in the 1980s. As the structures are less than 50 years old, they do not qualify as potentially historic resources. Thus, the project would have no effect on historic resources.

Because the project would include the relocation of existing County staff, it would not generate population or employment. Thus, there would be no effect of the project on population and housing, public services, or recreation. Further, because the Schilling Place complex is served by existing utilities, there would be no environmental effect related to the extension of utilities or service systems to the property.

The following sections analyze the project's potential impacts in the areas of aesthetics, air quality and greenhouse gas emissions, hazards and hazardous materials, noise, and traffic.

Aesthetics

The proposed project would include interior renovations to the existing Schilling Place complex in an industrial – business park area of Salinas. The aesthetics of the surrounding area would not be affected, since the project would not include external modifications to the existing structures. The Schilling Place complex is located immediately west of U.S. Highway 101, which is not an officially designated state scenic highway (Caltrans, 2011). Thus, the project would not damage to scenic resources within a highway officially designated as a state scenic highway.

As a result of the relocation of various County staff to the Schilling Place complex, five separate buildings located at 1611 and 1615 Bunker Hill Road, 893 Blanco Circle, 1610 Moffett Street, 815 Market, and 1370 South Main Street would be vacated and available for lease. The buildings would be vacant for an unknown period of time after the relocation of the County staff is completed through 2017. Such vacancies could result in aesthetic blight if the buildings were to enter a state of disrepair. However, it is expected that the buildings would be adequately maintained during any period of vacancy by their owners. Therefore, the project would not result in any significant aesthetic impacts in the vicinity of the Schilling Place complex or in the vicinity of the existing County buildings.

Air Quality and Greenhouse Gas Emissions

Air quality impacts are most commonly the result of construction activities, operation of new buildings or new uses, or increased levels of vehicle traffic associated with projects. The proposed project would not constitute a new land use, nor include any major construction that could result in substantial construction-related emissions.

Proposed improvements and modifications to the existing Schilling Place complex would include new hardwall spaces, the re-routing of HVAC supply/return, and the repositioning of lights. The majority of the work would consist of the reconfiguration of the existing workstation cubicles within the existing building. Painting and carpet replacement would also occur. These activities would have negligible air emissions and would not degrade air quality in the surrounding area or the region.



The air quality impacts associated with operation of the proposed project are equivalent to those that currently result from operations of the County offices in their existing locations.

As described under *Transportation and Traffic* below, the project would not generate new vehicle trips; rather, the project would redistribute existing vehicle trips. The net result of this redistribution would not be anticipated to result in substantially greater vehicle miles travelled. Thus, emissions associated with this vehicle use would not be substantially affected by the change in office locations and there would be no air quality impacts.

Hazards and Hazardous Materials

The project consists of improvements and modifications to the existing Schilling Place complex. The site is not included on any list compiled pursuant to Section 65962.5 of the Government Code (U.S. Environmental Protection Agency, 2014; State Water Resources Control Board, 2014; and California Department of Toxic Substances Control, 2014). The modifications would include the re-routing of HVAC supply/return, painting, and carpet replacement would also occur. These activities would not require the transportation of hazardous materials. In addition, any hazardous substances that may be included in the HVAC equipment, paint, and carpeting would be disposed of in accordance with applicable California and federal regulations. The existing Schilling Place complex was constructed in the 1980s and does not contain lead-based paint or asbestos containing materials. Further, no demolition activities would occur. Therefore, there are no concerns regarding asbestos-containing materials or lead-based paint. Improvements to the existing facilities would not expose workers, employees, or anyone in the surrounding area to hazards or hazardous materials.

The relocation of some County staff would result in the vacancy of three existing modular buildings. These buildings would be disposed of as a result. The materials used for the modular buildings could include hazardous materials, which would be disposed of in accordance with applicable California and federal regulations.

Noise

The proposed project consists of improvements and modifications to the existing Schilling Place complex. The complex is surrounded by industrial-business park and agricultural uses; there are no noise-sensitive receptors in the vicinity of the site. As improvements would be interior to the buildings, construction-related noise would not be anticipated to impact surrounding building tenants. Operational noise would primarily result from vehicle trips. As described under *Transportation and Traffic* below, the use of the Schilling Place complex by Monterey County would result in as many as 459 AM peak hour trips and 860 PM peak hour trips. These additional trips represent a small percentage of overall trips located in the vicinity of the Schilling Place complex, and would therefore not be expected to substantially increase roadway noise. Further, the nominal increase in noise would be compatible with the noise environment for the industrial-business park area.

U.S. Highway 101 is just east of the Schilling Place complex. The project site is also within the Salinas Municipal Airport Land Use Plan Study Area with the airport located just east of the Highway. Figure N-1 of the City of Salinas General Plan Noise Element shows the projected noise contours and associated Noise Impact Areas for the City. The location of the Schilling



Place complex is within the 70 CNEL contour. Figure N-2 shows the project site outside of the 55 CNEL Future Noise Contour of the Salinas Airport. According to Table N-4 of the General Plan, Government Services are compatible uses in areas with 65-70 CNEL contour. Therefore, occupancy of the Schilling Place complex would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan.

Transportation and Traffic

The use of the Schilling Place complex by Monterey County would not constitute a new or expanded use. Rather, the project would relocate existing County staff from existing buildings located in the City of Salinas (with 20 employees relocating from an existing office in the City of Marina) to the newly acquired buildings. As such, there would be no new trips generated by the proposed project; rather, the project would redistribute existing vehicle trips. Up to 450 County employees would be relocated. Based on the Institute of Transportation Engineers' *Trip Generation Manual, 9th Edition* (2012), government office buildings generate 1.02 AM peak hour trips per employee and 1.91 PM peak hour trips per employee. Therefore, use of the Schilling Place complex by Monterey County would result in as many as 459 AM peak hour trips and 860 PM peak hour trips. Abbott Street, approximately 0.1 mile south of the site, operated with approximately 18,932 average trips per day and an associated Level of Service (LOS) A in 2001, and is projected to operate with approximately 22,275 average trips per day and an associated LOS B upon General Plan buildout (City of Salinas General Plan EIR, 2002). The additional trips would therefore represent a small percentage of overall trips located in the vicinity of the Schilling Place complex.

Depending on where the trips originate (i.e. the residence of the County of employee), some trips may increase in length while other trips decrease in length. The net result of these modifications is not anticipated to be a substantial change for currently conditions, nor would it degrade the existing or projected levels of service on Abbott Street south of the site. Up to 20 employees may relocate from an existing office in Marina to the Schilling Place complex in Salinas as a result of the proposed project. If the majority of these employees currently reside in Marina, vehicle miles traveled would increase as a result of their relocation to the Schilling Place complex in Salinas. If, on the other hand, the majority of these employees currently reside in Salinas or other cities outside of Marina, the net result could be a decrease in vehicle miles traveled. The employees that currently work at 2620 1st Avenue in Marina represent 4.5% of the total number of employees that would be relocated under the proposed project (450), such that the effect of their trip redistribution would be minor. The remaining 95.5% of the affected employees may travel fewer miles to and from work, thereby ensuring that the net effect would be less than significant.

Cumulative Impacts

The proposed project would include interior improvements and modifications to the existing Schilling Place complex and relocation of up to 450 County staff persons to the newly acquired and renovated facility. There could be numerous interior renovation projects throughout the City of Salinas occurring at any given time, including renovations to other existing facilities near the Schilling Place complex. However, given the minor impacts associated with such improvements, these cumulative projects would not be anticipated to result in a significant contribution to cumulative impacts.



As described above, the effects of the internal modifications would not be significant. The project's operational impacts resulting from relocating County staff persons would also not be significant. Although the project would redistribute vehicle trips, these trips would not be new trips, and thus would not result in impacts to transportation and traffic, noise, or air quality and greenhouse gas emissions. In addition, compliance with existing regulations pertaining to the disposal of hazardous materials would ensure that the project would not result in hazardous materials impacts. The project's impacts would not combine with successive projects of the same type in the same place, and would generally not result in impacts. Thus, the project would not result in cumulative impacts.



4.0 SUMMARY

The California Environmental Quality Act (CEQA) Guidelines Section 15301 (Class 1), provides an exemption for "operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion or use beyond that existing at the time of the lead agency's determination. The key consideration is whether the project involves negligible or no expansion of an existing use." The proposed project includes internal modifications to an existing structure and would not include any ground disturbance, changes in land use, or other changes to the physical environment. Furthermore, the project would not result in changes to existing County operations. Thus, the project would be exempt under Class 1.

Furthermore, CEQA State Guidelines Section 15300.2 states that an environmental exemption shall not be used in the following instances:

- When the cumulative impact of successive projects of the same type in the same place, over time is significant;
- When there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances;
- When a project may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway;
- When a project is located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code; and/or
- When a project may cause a substantial adverse change in the significance of a historical resource.

As described above, the project would not result in a cumulative impact, and no unusual circumstances have been identified in association with the project. In addition, the project would not result in damage to scenic resources within an officially designated state scenic highway, and is not located on a hazardous material site. Finally, the proposed improvements would not result in damage to a historical resource. Therefore, the Capital One Building Occupancy Project fully qualifies for the Class 1 Categorical Exemption from CEQA review.



5.0 REFERENCES

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