Exhibit E

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Exhibit E
Addendum
Pursuant to the California Environmental Quality Act
Article 11, Section 15164

Esalen Institute
RMA-Planning File No. PLN150337

1. Introduction

This technical addendum has been prepared pursuant to Article 11, Section 15164 of the California Environmental Quality Act Guidelines to make minor technical changes to the environmental impacts analyzed in the Esalen Institute Mitigated Negative Declaration (Resolution No. 03080), adopted by the Planning Commission on November 12, 2003. The Esalen Institute Initial Study analyzed proposals for development on two separate properties – the main campus, located on a coastal bluff above the Pacific at 55000 Highway 1, and the South Coast Center, located approximately one mile north of the main campus at 54105 Highway 1, on the landward or eastern side of Highway 1. The Esalen Institute entitlements (covering both properties) consisted of a Coastal Development Permit (PLN020599) for development within 100 feet of environmentally sensitive habitat (to include sea cliff buckwheat), and a Coastal Development Permit for development on slopes of 30 percent or greater. This addendum reflects changes to those portions of the project associated with the South Coast property and analyzes potential impacts specific to the environmental aspects discussed in the Initial Study and subsequently adopted Mitigated Negative Declaration, 03-080, as the subject relates to the South Coast property.

PLN020599 project

The 2002 development proposal located on the South Coast property was to construct two (2) new structures (staff housing and a meeting room) with a cumulative 1,310 square foot footprint on a lot containing 13,500 square feet of structural coverage, resulting in lot coverage of 14,810 square feet. These structures were to be built on the northern reaches of the site within areas that were previously disturbed through farming activities during the early to mid-20th century, followed by the development of the South Coast Motel in the 1950s. The proposed buildings were to be located on the previously developed portions of the property that included fill soils and structural development, landscaping that included native trees and ornamental plants and ornamental grasses. The project proposal also included a proposed paved parking area of 16,988 square feet, resulting in a cumulative paved parking area coverage of 51,836 square feet on the parcel. The two proposed structures were never built and the plans to construct these structures has been abandoned. The parking lot, however, was constructed and is currently utilized as a site for temporary housing units for

Esalen employees. These temporary housing units would be removed as the proposed permanent housing structures are constructed and the parking lot would be utilized as the required parking for the employees of Esalen. Environmental impacts to the South Coast property were predominately related to the creation of the new parking lot described above, thus, the thrust of the environmental restoration and enhancement efforts described in the MND was related to the parking lot expansion. The restorative and enhancement measures were implemented and has been determined successful (Toyan 2019).

PLN150337 project

Based on the proposed design for this current project (PLN150337), none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or negative declaration have occurred. This addendum was prepared in order to quantify the site-specific environmental considerations of proposed structural development with a footprint of approximately 7,410 square feet on the South Coast property, resulting in a structural footprint of 18,046 square feet for the parcel, approximately 3,236 square feet more than what was considered under the 2003 Initial Study. A fire in 2011 destroyed an employee housing structure with a footprint of approximately 4,174 square feet. The proposed employee housing development is, in part, replacement for the housing lost in the fire and, in part, as substitution of the two previously approved residential structure and meeting room, but not built, described above.

Article 11, Section 15164 (Addendum to an EIR or Negative Declaration) provides, in pertinent part, the following:

(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted Negative Declaration.

(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

2. Scope and Purpose of this Addendum

The purpose of this addendum is to identify minor technical changes to the previously approved development proposal (PLN020599) and provide clarifications of the site-specific conditions for the current proposed development. The project involves the phased construction of three new employee housing structures and a “common room” with a cumulative footprint of approximately 7,410 square feet. The proposed development is located within a portion of the site that was developed in the 1950s and is also located in part where the destroyed employee structure was sited. Furthermore, the proposed development is located within the current limits of

disturbance established when the site was developed in the 1950s. Building one would be located in a developed area that is level and includes a temporary housing structure and ornamental turf grass. Buildings two and three are located on an adjacent terrace that is the result of fill materials deposited during the site development in the 1950s. The destroyed employee housing unit was located on this terrace. The terrace is characterized by portions of a paved driveway, a dirt roadway, remnant turf grass and a number of non-native, invasive species, and three or four Coastal scrub plants that could be considered incidental as there is no chaparral or other plants associated with chaparral in this portion of the site. This portion of the site is generally degraded from a biological or native habitat standard. The non-native and invasive plants found in this area would be removed as part of the current project.

The Esalen Institute MND analysis of 2003 included the evaluation of impacts associated with the proposed structural development and additional coverage resulting from an expansion of paved parking facilities. The Initial Study identified potential sensitive habitat in close proximity to the proposed (since constructed) parking lot; the location of the proposed structures described earlier did not contain any sensitive plants or indication that animals included on the State or Federal sensitive animal lists were present. The MND recommended appropriate mitigation measures to reduce potential impacts relating to the parking lot construction to a level of less than significant. Those mitigation measures were implemented and determined to be successful. None of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have been triggered by the proposed development of replacement or substituted employee housing structures.

The structural development proposed under the current application (PLN150337) would provide a slight increase in the cumulative structural footprint on the site over what would have been if the employee housing building was not destroyed by fire and if the two buildings described earlier would have been built. The proposed development also increases the number of employee housing units and square footage of conditioned area on the site. However, the development proposed has beneficial impacts as the proposal is employee housing for Esalen staff. The benefits of this development would include reduced traffic impacts to Highway 1 and reduced vehicular emissions associated with reduced traffic trips relating to the Esalen Institute. The proposed project would not be growth inducing as the housing is restricted to Esalen employees and would not result in any cumulative impacts.

The Esalen Institute Initial Study and MND contained analysis and mitigation relating to two separate parcels approximately one mile apart. There were common resources found at both locations. The resources have various designations, including candidate, sensitive, and special-status species. Of the biological resources cited in the 2003 MND, the following are found or are potentially present on the South Coast property: roosting and breading habitat for olive-sided flycatcher is present, however, no such birds were observed during site reconnaissance in 2000 and again in 2018;

Monterey dusky-footed woodrat; habitat for Smith's blue butterfly (sea cliff buckwheat); arroyo willow habitat; and northern coastal scrub habitat. These resources are addressed in more detail below.

Requirements and scope of study undertaken through the Initial Study process have evolved since the Esalen Initial Study was conducted and the resultant MND adopted. Namely, the CEQA process has added four (4) new sections of analysis: Energy, Greenhouse Gas Emissions, Tribal/Cultural Resources, and Wildfires. These sections are incorporated into this addendum as they appear in current CEQA guidelines. The addition of these new topics has altered the numbering system in contemporary Initial Studies, thus, the numbering sequence found in the 2001 Initial Study is different than what it would be today, with a duplication of topic numbers between the original IS and this addendum. The numbering found in this Addendum follows that of the original IS. The new sections, in some instances, will have an identical number and are denoted with brackets [ ].

Initial Study item 4 Biological Resources

Tree preservation policy ordinance

It is the policy to preserve the forest resources – trees and major vegetation – of the Big Sur area. The South Coast property includes a mixed-conifer forest of Monterey pine and Monterey cypress. These tree species are native to California but are not native to Big Sur and were likely planted over the decades (Toyan 2018). The trees are located predominately along portions of the perimeter of the historical and current site development and provide screening of the structural development from Highway 1. These stands of trees are outside the limits of grading for the project proposal. The interior portions of the site are characterized by development, degraded habitat through the historical farming practices of the early to mid-20th century, altered topography to accommodate the development of the site, and ornamental landscaping including turf grass and small, non-native brush or plants. There are instances of Monterey pine or Monterey cypress utilized in this ornamental landscaping scheme and planted as a screening device most likely in conjunction with the development of the motel in the 1950s. Along the southern portions of the forestation, adjacent to an existing service road, are isolated instances of Coastal Scrub.

Mitigation Measure 1 requires that all trees be retained where possible (except in emergencies and special cases). The current project proposal requires the removal of ornamental trees and shrub, remnants of previous landscaping scheme. However, trees within proximity of the project shall be protected with exclusionary fencing and barricades as needed. Plans depict tree protection measures as prescribed by the biological assessment and tree removal that complies with the Monterey County Coastal Implementation Plan, Part 3 (Big Sur) 20.145.60. Moreover, the stands of trees that screen the proposed development are located outside the limits of grading and will be preserved. The project proposal is compliant with the adopted MND (Resolution 03080).

Olive-sided flycatcher

The project biologist estimates a high probability that the olive-sided flycatcher is present at the Esalen properties, though more likely at the main campus. Regardless, conditions exist on the South Coast property for nesting habitat in the site's conifer forestation described above. This bird species is a Migratory Non-game Bird of Management Concern, according to the US Fish & Wildlife Service. The biologist notes that the "[o]live-sided flycatcher, *Contopus borealis*, nests in mixed conifer forests and eucalyptus groves, and breeding is known from the immediate area of the Esalen main property and the South Coast Center." The project proposal includes the removal of non-native ornamental trees within the limits of disturbance to accommodate the proposed project. The mixed conifer stands of trees along the northern property line are located outside the limits of development and would be preserved. The mixed conifer stands of trees located along the western portions of the site are outside the limits of disturbance for this project proposal and would not be disturbed. Additionally, since Mitigation Measure 1 requires that all trees be retained where possible (except in emergencies and special cases), potential impacts to the olive-sided flycatcher are maintained at less-than significant levels.

Smith's Blue Butterfly & Northern Coastal Scrub

Part of Esalen's project proposal includes the restoration of northern coastal scrub habitat through the elimination (where feasible, due to steep slopes [main campus]) and control of invasive exotic plant species, as well as by replanting with sea cliff buckwheat to enhance the habitat for Smith's blue butterfly, a federally-listed endangered species. At the South Coast Property, 4,922 square feet of northern coastal scrub habitat (with no Seacliff buckwheat) was impacted to construct the expanded parking lot area. However, a total of 24,263 sq. ft. (approximately ½ acres of northern coastal scrub habitat was restored on site.

The mitigation measures relating to the Northern Coastal Scrub were successfully implemented (Toyon, November 2, 2018). No sea cliff buckwheat was observed growing within 100 feet of the proposed project. Furthermore, no sea cliff buckwheat was observed growing in the area during the 2002 survey (Norman).

There would be no impact to sea cliff buckwheat, or the northern coastal scrub found on the South Coast property.

Bats: Yuma myotis, Long-legged myotis, Fringed myotis, Long-eared myotis, Townsend's western big-eared bat, and Pallid bat

No focused survey was conducted during the 2000 reconnaissance and the likelihood of any of the bats being present on the site are low. The bats typically roost in tree crevices and in buildings. There are no buildings proposed for removal as part of the current project. The current project proposal is within the existing limits of disturbance present on the site and tree protection measures described earlier in this addendum will protect any potential bat habitat. Possible mitigation measures were specific to the main campus regarding building demolition related to improvements on that site. There were no mitigation measures proposed for the South Coast

property. Regardless, it is recommended that a pre-construction survey of the site be conducted by a qualified biologist. If any of the bats are found to be roosting, mitigation measures may include providing suitable refugia farther away from the construction zone.

Monterey Dusky-footed Woodrat

The Monterey dusky-footed woodrat lives exclusively in the Santa Lucia Mountains of Central California. It is a federal "species of concern" as well as a California "special concern species" and the South Coast property includes habitat that is suitable for the woodrat. An updated biological assessment was conducted at the South Coast property on November 2, 2018, during which time a nest for a sub-species, the San Francisco dusky-footed wood rat was observed at the perimeter of the pine forestation. The biologist noted that the nest is located outside of the limits of grading (development) and no impacts are expected to this species from the proposed project. A mitigation measure relating to reducing impacts to this species was specific to the Main campus, however, the tree protection measures described above would provide protection of the tree resources at the South Coast property and thus provide habitat for the woodrat.

Arroyo Willow Riparian Habitat

This plant is associated with surface or subsurface moisture. Approximately 697 square feet were impacted by the construction of the parking lot. However, approximately 24,263 square feet was restored on site, a replacement ratio of nearly 5:1. There is no Arroyo Willow present at the proposed building location because the housing location is at an elevation approximately 25 feet above the arroyo elevation. The spatial distance between the proposed building site and the willow riparian forest is approximately 140 feet. There would be no impacts to this biological resource as a result of the project proposal. Regardless, exclusionary fencing and silt fencing would be installed along the southern edges to the driveway to protect the eastern reaches of the willow restoration area.

Coastal Sage Scrub and Smith's blue butterfly

The Coastal Sage Scrub plant community is not considered sensitive habitat in and of itself but can include seacliff buckwheat, possible habitat for the Smith's blue butterfly. Impacts to the habitat were addressed during the CEQA process relating to PLN020599 and the Adopted Mitigated Negative Declaration (03080). The Toyan assessment (November 2018) noted that the impacts to the project were successfully implemented and no impacts to this habitat are expected beyond the original Biological Assessment. The Toyon assessment concluded that no additional mitigations are required.

Initial Study Item 5: Cultural Resources

No archaeological resources have been identified at the South Coast property. Nevertheless, in general, the entire Big Sur coast is considered to be an area of high archaeological sensitivity. Therefore, the possibility remains that archaeological

resources may be discovered during construction activities. Regardless, a standard condition of approval will be imposed:

If, during the course of construction, cultural, archaeological, historical or paleontological resources are uncovered at the site (surface or subsurface resources) work shall be halted immediately within 50 meters (165 feet) of the find until it can be evaluated by a qualified professional archaeologist. The Monterey County Planning and Building Inspection Department and a qualified archaeologist (i.e., an archaeologist registered with the Society of Professional Archaeologists) shall be immediately contacted by the responsible individual present on-site. When contacted, the project planner and the archaeologist shall immediately visit the site to determine the extent of the resources and to develop proper mitigation measures required for the discovery.

Initial Study Item 6: Geology and Soils

Soils & Lithology

According to the *Soil Survey of Monterey County*, the soils at the South Coast Center's proposed project site are "*Lockwood shaly loam.*" According to the information contained in the PBID's Geographic Information System (GIS), the area of the South Coast Center has a high susceptibility for landslides. The erosion risk is moderate at the South Coast Center's project site, according to the PBID GIS. The risk of liquefaction is low at the [South Coast] site, according to the PBID GIS. Nevertheless, the geologic and preliminary geotechnical reports produced for the current proposal do not raise any negative concerns due to the soil characteristics or lithology found at the South Coast site.

Seismicity

The Resource Maps characterize the seismic hazards at the Esalen properties as "relatively unstable upland areas." In addition, a trace of the Sur Fault Zone passes within 1/8 of a mile of the South Coast Center. This Sur Fault is categorized as "Quaternary undifferentiated" by the GIS fault layer created for the Monterey County General Plan Update. The Quaternary Period dates from 1.6 million years ago. The fault's "undifferentiated" categorization signifies that although its most recent movement is believed to have occurred during the last 1.6 million years, it is currently unknown precisely when during this period the most recent movement would have occurred. Further, this means that the Sur Fault is defined by the Monterey County Code as "potentially active" since it is thought to have experienced movement within the past 3,000,000 years. Potentially active faults are considered "active" by the Code unless proven otherwise. Therefore, to maintain plan consistency and to reduce potential seismic-related impacts to less-than-significant levels, necessary mitigation measures are designed to address impacts that could result from an active fault.

Mitigation Measure 15:

The proposed development at the South Coast property is sited as such that it is at least 660 feet from the Sur Fault (Fault Survey). Regardless, all building plans for structures at…the South Coast Center shall bear the wet-seal stamp, date, and

signature of a registered geologist or certified engineering geologist and a certified geotechnical engineer, indicating that the plans adequately incorporate the recommendations of these consulting professionals for reducing seismic-related impacts to less-than-significant levels.

Initial Study Item 8: Hydrology and Water Quality

Water Supply & Water Quality

The project will not increase wastewater disposal to a point where it would violate the existing California Regional Water Quality Control Board's Water Quality Order No. 97-10 (General Waste Discharge Requirements for Discharges to Land by Small Domestic Wastewater Treatment Systems) already in place (Reference #17, page 2-2). Nitrogen loading will be reduced…with the proposed wastewater disposal system (Reference #17, pages 2-9, 2-16, & 2-17). Wastewater will be denitrified through an enhanced wastewater treatment process (Reference #17, page 2-9). Through this process, the total nitrogen load (TNL)…will be reduced from…91.0g/acre to 52.8g/acre. Regardless, wastewater disposal on the South Coast property will still exceed the Monterey County limit of 40g/acre.

However, the Environmental Health Division of the Monterey County Health Department has concluded that, due to the absence of usable freshwater groundwater resources under the South Coast property, the nitrogen loadings do not represent a significant environmental impact or public health threat (Reference #17, pages 2-17 & 2-18).

The project proposes to treat the wastewater by using a septic/recirculation tank for primary solids removal and an Orenco Advantex textile filter wastewater system for secondary treatment and the denitrification of wastewater (Reference #16, page 2-9 & its Appendix A). Disposal of treated effluent will be through a subsurface landscape irrigation system and back-up leach fields (Reference #16, page 2-9). To further treat the wastewater, an open water constructed wetlands will be built (Reference #16, page 2-10). By incorporating subsurface landscape irrigation with the treated wastewater, at full build out of the Long-Term Development Plan, water use on the South Coast property will be reduced by 7% (Reference #16, Table 4.11, page 4-9). Therefore, there will be no depletion of groundwater supplies and there will be no substantial interference with groundwater recharge. Groundwater recharge would actually be improved with the proposed project since less water would be extracted from the surface springs at the South Coast property.

The spring serving the South Coast property produces fresh water at 8 gallons per minute (gpm) (Reference #16, page 3-4), or 11,520 gallons per day, or four times what is needed at build out (Reference #16, Table 4.3, page 4-2).

Hydrology

Drainage conditions will be improved by the proposed project through the implementation of Best Management Practices (BMPs), such that substantial erosion or siltation on- or off-site will not result but instead will be reduced. Neither will

flooding (on- or off-site) result from the proposed project, since the topography in the area is generally fairly steep and therefore not conducive to flooding. No levees or dams are located in the area. Stormwater drainage systems will be improved through the BMPs proposed by the project, which will slow and treat drainage with bio-swales, sod roofs and subterranean downspout drainage systems on some buildings.

Erosion Control

Specific erosion control measures during construction are required above by Mitigation Measure 10 under Section VI.4 – Biological Resources. These measures will also minimize impacts.

The project will not generate significant hydrologic or water-quality impacts or impacts that would require mitigations in order to be lessened to less-than-significant levels. As stated above, overall water demand will be reduced through the use of water-saving technologies, wastewater treatment will be upgraded to secondary and tertiary treatment levels, and surface hydrology will be improved through the use of BMPs that address runoff. Therefore, the project is "self-mitigating" in the areas of hydrology and water quality due to the proposed implementation of BMPs and superior technologies for addressing these issues. Erosion controls during construction are required by Mitigation Measure 10 under Section VI.4 – Biological Resources (Arroyo Willow Riparian habitat. The restoration was installed and monitored as recommended in the IS. Condition compliance has been completed and conditions met).

Initial Study Item 9: Land Use and Planning

The Initial Study conducted for PLN020599 noted that the uses at the South Coast property are legal, non-conforming to land use ordinances and the local coastal plan. The uses located on the South Coast property and the current project proposal are conforming to the zoning ordinance, specifically 20.17.050.HH, *Other residential or agricultural uses of a similar nature, intensity and density as those listed in the Section determined by the Planning Commission to be consistent and compatible with this Chapter and the applicable land use plan*. The project proposal would have no impact on land use and planning. The proposed project would not divide an established community – it is located in a rural part of the County; does not conflict with any applicable land use plan or zoning ordinance; and does not conflict with any applicable habitat conservation plan.

Initial Study Item 15: Transportation and Traffic

The construction of the proposed project would have a temporary increase in traffic trips. However, the number of trips generated during construction and their short-term duration do not represent a significant impact and therefore do not require mitigation. Furthermore, the construction of employee housing would actually reduce the number of daily trips on Highway 1 by providing housing for the employees, substantially reducing the Vehicle Miles Traveled (VMT) by the employees.

Initial Study Item 16: Utilities and Service Systems

The new onsite wastewater-treatment and stormwater-drainage facilities proposed by the project will have the potential to cause some environmental impacts. However, these potential impacts will be reduced to less-than-significant levels through required mitigation measures and monitoring actions. These issues are discussed in detail in Sections 4 (Biological Resources)…and 8 (Hydrology and Water Quality), above. Local- or regional-level facilities will not be required.

New topics of consideration as required by current CEQA standards

Since the Initial Study was conducted for the original development proposal, PLN020599, the scope of an Initial Study has expanded to include new areas of analysis. The following sections are required by CEQA and are included in this Addendum to the original Initial Study:

[6.] ENERGY **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Source: 1, 3, 7)	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Source: 1, 3, 7)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
As described in the Introduction above of this Addendum, implementation of the project includes the construction of three dormitory-like buildings for the purpose of employee housing on a developed lot in a coastal rural area. Cumulative square footage for the new buildings would be approximately 14,026 square feet (conditioned space). The proposed employee housing is, in part replacement for the 4,174 square foot employee housing structures destroyed by fire, structures that were built in the 1950s. There would be a net gain of approximately 9,852 square feet in conditioned, habitable space over the existing 2002 baseline that would require energy for lights, heating, and cooling. The project includes photovoltaic rooftop panels to produce a portion of the energy required to serve the site. Additionally, the project would meet all building requirements to meet Title 24 of the Uniform Building Code (UBC) and would be more energy efficient than the building that was destroyed by the fire, a building that was constructed in the 1950s. Therefore, the project would consume modest energy for functions such as internal building lighting, heating or air conditioning. There is no mitigation required.

[8.] GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Source: 1, 8, 9)	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Source: 1, 8, 9)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

According to the United States Environmental Protection Agency (EPA), greenhouse gases (GHG) are emitted by natural processes and human activities such as electricity production, motor vehicle use, and agricultural uses. These gases trap heat in the atmosphere and the elevation of GHGs has led to a trend of unnatural warming of the earth's climate, otherwise known as the "greenhouse effect". In order to reduce the statewide level of GHG emissions, the State Legislature adopted California Assembly Bill 32 (AB 32) California Global Warming Solutions Act of 2006. AB 32 established a comprehensive statewide program of regulatory and market mechanisms to achieve reductions in GHG emissions, thereby reducing the State's vulnerability to global climate change. The Monterey Bay Air Resources District (MBARD) is responsible for the monitoring of air quality and regulation of stationary sources throughout the North Central Coast Air Basin, where the proposed Project is located, by enforcing standards and regulating stationary sources through the *2012-2015 Air Quality Management Plan for the Monterey Bay Region* (AQMP) (Source 9) which evaluates a project's potential for a cumulative adverse impact on regional air quality (ozone levels)

8(a) - Less Than Significant Impact.

Impacts to greenhouse emissions would be less than significant, based on the fact that the construction of the structures would cause temporary, short-term greenhouse emissions. The Project includes site preparations and subsequent construction of three employee housing units, and the operational component of the structures once they are built and occupied. Temporary construction activities of the proposed project would be the main contributor to GHG emissions. From an operational GHG emission standpoint, this project would result in negligible to modest change to the baseline GHG emissions of the surrounding area. However, quantifying Project emissions at this time would be too speculative. Therefore, in lieu of State guidance or locally adopted thresholds, a primarily qualitative approach was used to evaluate possible impacts from the proposed Project.

Ambient ozone levels depend largely on the number of precursors, such as nitrogen oxide (NO_x) and reactive organic gases (ROG), emitted into the atmosphere. Implementation of the Project would result in temporary impacts resulting from grading and construction activities that require fuel combustion of construction vehicles, a primary source of NO_x and ROG emittance. Typical construction equipment would be used for the project and NO_x and ROG emitted from that equipment have been accommodated within the AQMP. Therefore,

implementation of the Project would produce no more than the threshold of significance of 82 pounds per day of GHG precursors and these precursor emissions would have a less than significant impact on GHGs. No mitigation is required.

Greenhouse Gas Emissions 8(b) – No Impact.
As described above, the project's temporary construction and permanent use emissions are below the applicable GHG significance thresholds established by CARB, and the MBUAPCD has no established GHG thresholds. The project would not conflict with any local or state GHG plans or goals. Therefore, the project would not result in impacts.

[18.] TRIBAL CULTURAL RESOURCES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or (Source: 1, 2, 3, 4, 7 &15)	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Source: 1, 2, 3, 4, 7 &15)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
As described in the Introduction above of this Addendum, implementation of the project includes the construction of three dormitory-like buildings in a location that was previously disturbed when the property was developed in the 1950s. Prior to the development of the original motel, the site was used for agricultural uses, including farming. The archaeological report prepared for the 2002 permit, LIB090038, noted that No archaeological resources had been identified at the South Coast property. Nevertheless, in general, the entire Big Sur coast is considered to be an area of high archaeological sensitivity. Therefore, the possibility remains that archaeological resources may be discovered during construction activities. A standard condition of approval will also be imposed on the project, which requires that: "If, during the course of construction, cultural, archaeological, historical or paleontological resources are uncovered at the site (surface or

subsurface resources) work shall be halted immediately within 50 meters (165 feet) of the find until it can be evaluated by a qualified professional archaeologist. The Monterey County Resource Management Agency and a qualified archaeologist (i.e., an archaeologist registered with the Society of Professional Archaeologists) shall be immediately contacted by the responsible individual present on-site. When contacted, the project planner and the archaeologist shall immediately visit the site to determine the extent of the resources and to develop proper mitigation measures required for the discovery."

[20.] WILDFIRE **If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☒	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation: Discussion/Conclusion/Mitigation:
The project involves the phased construction of three new employee housing structures with a cumulative footprint of approximately 7,410 square feet. The proposed structures are located on a portion of the site that was previously developed in the 1950s. The project is located in a rural coastal area characterized by sloping terrain to the east and Highway 1 and the Pacific Ocean to the west. Wildfire could potentially isolate the development from areas not affected by such a fire. The project would be built to conform with the UBC and Monterey County Codes, which would require fire sprinklers within the structural development and water tanks with water that could be dedicated to fighting fire on the property. Additionally, the project includes a landscape plan that conforms to current fire protection standards, namely a 30 foot "defense zone" that includes plants with a high-water content and foliage that is not as susceptible to fire. Lastly, the Big Sur Fire Brigade has a fire truck and some fire-fighting equipment on site that could potentially be utilized in the defense of the property.

3. Conclusion

The purpose of this addendum is to identify minor technical changes and provide clarifications of the site-specific conditions and the scope of work for the proposed development. Staff has reviewed the Mitigated Negative Declaration for the Esalen projects of 2003 (Resolution No. 03-080) and the proposed employee housing development for consistency with the environmental considerations contained within. No adverse environmental effects were identified, other than what was analyzed in the original Mitigated Negative Declaration, during staff review of the development application, and during a site inspection on August 22, 2018. Staff finds that the site-specific conditions and the scope of work on the site do not constitute substantive changes, are consistent with the analysis provided in the MND, and therefore do not warrant the preparation of a subsequent environmental document.