Attachment C

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Print Form

Appendix C

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Morgenrath (Blaze Engineering)

Lead Agency: County of Monterey - RMA Planning | Contact Person: Anna V. Quenga, Senior Planner
Mailing Address: 1441 Schilling Place, 2nd Floor | Phone: (831) 755-5175
City: Salinas | Zip: 93933 | County: Monterey

Project Location: County: Monterey | City/Nearest Community: Big Sur
Cross Streets: State Route 1 and Apple Pie Ridge Road | Zip Code: 93920
Longitude/Latitude (degrees, minutes and seconds): 36 ° 16 ′ 17.7 ″ N / 121 ° 48 ′ 22.6 ″ W Total Acres: 2.55
Assessor's Parcel No.: 419-201-007-000 | Section: S23 | Twp.: 9S | Range: 1E | Base:
Within 2 Miles: State Hwy #: State Route 1 | Waterways: Big Sur River, Pacific Ocean
Airports: N/A | Railways: N/A | Schools: Captain Cooper

Document Type:

CEQA: ☐ NOP ☐ Early Cons ☐ Neg Dec ☒ Mit Neg Dec ☐ Draft EIR ☐ Supplement/Subsequent EIR (Prior SCH No.) ☐ Other:
NEPA: ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI
Other: ☐ Joint Document ☐ Final Document ☐ Other:

Local Action Type:

☐ General Plan Update ☐ General Plan Amendment ☐ General Plan Element ☐ Community Plan
☐ Specific Plan ☐ Master Plan ☐ Planned Unit Development ☐ Site Plan
☐ Rezone ☐ Prezone ☐ Use Permit ☐ Land Division (Subdivision, etc.)
☐ Annexation ☐ Redevelopment ☒ Coastal Permit ☐ Other:

Development Type:

☐ Residential: Units ____ Acres ____
☐ Office: Sq.ft. ____ Acres ____ Employees ____
☒ Commercial: Sq.ft. 2160 Acres 2.55 Employees 20
☐ Industrial: Sq.ft. ____ Acres ____ Employees ____
☐ Educational:
☐ Recreational:
☐ Water Facilities: Type ____ MGD ____
☐ Transportation: Type
☐ Mining: Mineral
☐ Power: Type ____ MW ____
☐ Waste Treatment: Type ____ MGD ____
☐ Hazardous Waste: Type
☐ Other:

Project Issues Discussed in Document:

☒ Aesthetic/Visual
☐ Agricultural Land
☒ Air Quality
☐ Archeological/Historical
☒ Biological Resources
☒ Coastal Zone
☒ Drainage/Absorption
☐ Economic/Jobs
☐ Fiscal
☐ Flood Plain/Flooding
☒ Forest Land/Fire Hazard
☒ Geologic/Seismic
☐ Minerals
☒ Noise
☐ Population/Housing Balance
☐ Public Services/Facilities
☐ Recreation/Parks
☐ Schools/Universities
☒ Septic Systems
☐ Sewer Capacity
☒ Soil Erosion/Compaction/Grading
☐ Solid Waste
☒ Toxic/Hazardous
☒ Traffic/Circulation
☐ Vegetation
☐ Water Quality
☐ Water Supply/Groundwater
☐ Wetland/Riparian
☐ Growth Inducement
☐ Land Use
☐ Cumulative Effects
☒ Other: Tribal Cultural

Present Land Use/Zoning/General Plan Designation:

Visitor Serving Commercial, Design Control (Coastal Zone)

Project Description: *(please use a separate page if necessary)*

Combined Development Permit consisting of 1) Coastal Development Permit, Design Approval, and General Development Plan to allow the establishment of a commercial business operation including a 760 square foot office, a 600 square foot workshop, an 800 square foot storage unit, storage of equipment such as generators, cement silo, diesel storage tanks, and septic system; 2) Coastal Development Permit to allow development on slopes in excess of 30%; 3) a Coastal Development Permit to allow removal of 16 protected trees; and 4) Coastal Administrative Permit to convert a test well into a permanent well.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "**X**".
If you have already sent your document to the agency please denote that with an "**S**".

S Air Resources Board
____ Boating & Waterways, Department of
____ California Emergency Management Agency
____ California Highway Patrol
S Caltrans District # 5
____ Caltrans Division of Aeronautics
____ Caltrans Planning
____ Central Valley Flood Protection Board
____ Coachella Valley Mtns. Conservancy
S Coastal Commission
____ Colorado River Board
____ Conservation, Department of
____ Corrections, Department of
____ Delta Protection Commission
____ Education, Department of
____ Energy Commission
____ Fish & Game Region # ____
____ Food & Agriculture, Department of
____ Forestry and Fire Protection, Department of
____ General Services, Department of
____ Health Services, Department of
____ Housing & Community Development
S Native American Heritage Commission

____ Office of Historic Preservation
____ Office of Public School Construction
____ Parks & Recreation, Department of
____ Pesticide Regulation, Department of
____ Public Utilities Commission
____ Regional WQCB # ____
____ Resources Agency
____ Resources Recycling and Recovery, Department of
____ S.F. Bay Conservation & Development Comm.
____ San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
____ San Joaquin River Conservancy
____ Santa Monica Mtns. Conservancy
____ State Lands Commission
____ SWRCB: Clean Water Grants
____ SWRCB: Water Quality
____ SWRCB: Water Rights
____ Tahoe Regional Planning Agency
____ Toxic Substances Control, Department of
S Water Resources, Department of

____ Other: ____
____ Other: ____

Local Public Review Period (to be filled in by lead agency)

Starting Date September 5, 2018 Ending Date October 5, 2018

Lead Agency (Complete if applicable):

Consulting Firm: N/A
Address: ____
City/State/Zip: ____
Contact: ____
Phone: ____

Applicant: Morgenrath Martha J, TR ET AL
Address: HC67 BOX 1201
City/State/Zip: BIG SUR CA 93920
Phone: (831) 667-2697

Signature of Lead Agency Representative: ____ **Date:** 8/31/2018

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

County of Monterey
State of California

MITIGATED NEGATIVE DECLARATION

FILED
AUG 31 2018
STEPHEN L. VAGNINI
MONTEREY COUNTY CLERK
DEPUTY

Project Title:	Morgenrath (Blaze Engineering)
File Number:	PLN160851
Owner:	Morgenrath Martha J TR ET AL
Project Location:	46821 Highway 1, Big Sur
Primary APN:	419-201-007-000
Project Planner:	Anna V. Quenga, Senior Planner
Permit Type:	Combined Development Permit
Project Description:	Combined Development Permit consisting of 1) Coastal Development Permit, Design Approval, and General Development Plan to allow the establishment of a commercial business operation including a 760 square foot office, a 600 square foot workshop, an 800 square foot storage unit, storage of equipment such as generators, cement silo, diesel storage tanks, and septic system; 2) Coastal Development Permit to allow development on slopes in excess of 30%; 3) a Coastal Development Permit to allow removal of 16 protected trees; and 4) Coastal Administrative Permit to convert a test well into a permanent well.

THIS PROPOSED PROJECT WILL NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AS IT HAS BEEN FOUND:

a) That said project will not have the potential to significantly degrade the quality of the environment.

b) That said project will have no significant impact on long-term environmental goals.

c) That said project will have no significant cumulative effect upon the environment.

d) That said project will not cause substantial adverse effects on human beings, either directly or indirectly.

Decision Making Body:	Planning Commission
Responsible Agency:	County of Monterey
Review Period Begins:	September 5, 2018
Review Period Ends:	October 5, 2018

Further information, including a copy of the application and Initial Study are available at the Monterey County RMA Planning, 1441 Schilling Place South, 2nd Floor, Salinas, CA 93901/(831) 755-5025

MONTEREY COUNTY
RESOURCE MANAGEMENT AGENCY
Carl P. Holm, AICP, Director

LAND USE & COMMUNITY DEVELOPMENT | PUBLIC WORKS & FACILITIES | PARKS
1441 Schilling Place, South 2nd Floor (831)755-4800
Salinas, California 93901-4527 www.co.monterey.ca.us/rma

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION
MONTEREY COUNTY PLANNING COMMISSION

NOTICE IS HEREBY GIVEN that Monterey County Resource Management Agency – Planning has prepared a draft Mitigated Negative Declaration, pursuant to the requirements of CEQA, for a Combined Development Permit (Morgenrath, File Number PLN160851) at 46821 Highway 1, Big Sur (APN 419-201-007-000) (see description below).

The Mitigated Negative Declaration and Initial Study, as well as referenced documents, are available for review at Monterey County Resource Management Agency – Planning, 1441 Schilling Place, South 2nd Floor, Salinas, California. The Mitigated Negative Declaration and Initial Study are also available for review in an electronic format by following the instructions at the following link: http://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/environmental-documents/pending .

The Planning Commission will consider this proposal at a meeting tentatively set for October 31, 2018, in the Monterey County Board of Supervisors Chambers, 168 West Alisal, 2nd Floor, Salinas, California. Written comments on this Mitigated Negative Declaration will be accepted from September 5, 2018 to October 5, 2018. Comments can also be made during the public hearing.

Project Description: Combined Development Permit consisting of 1) Coastal Development Permit, Design Approval, and General Development Plan to allow the establishment of a commercial business operation including a 760 square foot office, a 600 square foot workshop, an 800 square foot storage unit, storage of equipment such as generators, cement silo, diesel storage tanks, and septic system; 2) Coastal Development Permit to allow development on slopes in excess of 30%; 3) a Coastal Development Permit to allow removal of 16 protected trees; and 4) Coastal Administrative Permit to convert a test well into a permanent well.

We welcome your comments during the 30-day public review period. You may submit your comments in hard copy to the name and address above. The Agency also accepts comments via e-mail or facsimile but requests that you follow these instructions to ensure that the Agency has received your comments. To submit your comments by e-mail, please send a complete document including all attachments to:

CEQAcomments@co.monterey.ca.us

An e-mailed document should contain the name of the person or entity submitting the comments and contact information such as phone number, mailing address and/or e-mail address and include any and all attachments referenced in the e-mail. To ensure a complete and accurate

record, we request that you also provide a follow-up hard copy to the name and address listed above. If you do not wish to send a follow-up hard copy, then please send a second e-mail requesting confirmation of receipt of comments with enough information to confirm that the entire document was received. If you do not receive e-mail confirmation of receipt of comments, then please submit a hard copy of your comments to ensure inclusion in the environmental record or contact the Agency to ensure the Agency has received your comments.

Facsimile (fax) copies will be accepted with a cover page describing the extent (e.g. number of pages) being transmitted. A faxed document must contain a signature and all attachments referenced therein. Faxed document should be sent to the contact noted above at **(831) 757-9516**. To ensure a complete and accurate record, we request that you also provide a follow-up hard copy to the name and address listed above. If you do not wish to send a follow-up hard copy, then please contact the Agency to confirm that the entire document was received.

For reviewing agencies: Resource Management Agency – Planning requests that you review the enclosed materials and provide any appropriate comments related to your agency's area of responsibility. The space below may be used to indicate that your agency has no comments or to state brief comments. In compliance with Section 15097 of the CEQA Guidelines, please provide a draft mitigation monitoring or reporting program for mitigation measures proposed by your agency. This program should include specific performance objectives for mitigation measures identified (CEQA Section 21081.6(c)). Also inform this Agency if a fee needs to be collected in order to fund the mitigation monitoring or reporting by your agency and how that language should be incorporated into the mitigation measure.

All written comments on the Initial Study should be addressed to:

County of Monterey
Resource Management Agency – Planning
Attn: Anna V. Quenga, Senior Planner
1441 Schilling Place, South 2nd Floor
Salinas, CA 93901

Re: Morgenrath PLN160851

From: Agency Name: _____
Contact Person: _____
Phone Number: _____

___ No Comments provided
___ Comments noted below
___ Comments provided in separate letter

COMMENTS: _____

_____

_____

_____

DISTRIBUTION

1. State Clearinghouse (15 CD copies + 1 hard copy of the Executive Summary) – include the Notice of Completion
2. County Clerk's Office
3. California Coastal Commission
4. CalTrans District 5, Attn: Chris Bjornstad (San Luis Obispo office)
5. Native American Heritage Commission, Sacramento Office
6. Louise Miranda-Ramirez, C/O Ohlone/Costanoan-Esslen Nation
7. Association of Monterey Bay Area Governments
8. Monterey Bay Air Resources District
9. California Department of Fish & Wildlife, Marine Region, Attn: Steven Rienecke
10. Monterey County Water Resources Agency
11. Monterey County RMA-Environmental Services
12. Morgenrath Martha J Tt Et Al (Owner)
13. Law Offices of Aengus Jeffers, Attn: Laura Lawrence (Agent)
14. The Open Monterey Project
15. LandWatch Monterey County
16. Maureen Wruck Planning Consultants LLC, Attn: Joel Panzer
17. Paul Smith
18. Property Owners & Occupants within 300 feet (**Notice of Intent only**)

Distribution by e-mail only (Notice of Intent only):

19. U.S. Army Corps of Engineers (San Francisco District Office: Katerina Galacatos: galacatos@usace.army.mil)
20. Emilio Hipolito (ehipolito@nccrc.org)
21. Molly Erickson (Erickson@stamplaw.us)
22. Margaret Robbins (MM_Robbins@comcast.net)
23. Michael Weaver (michaelrweaver@mac.com)
24. Monterey/Santa Cruz Building & Construction (Office@mscbctc.com)
25. Tim Miller (Tim.Miller@amwater.com)

Revised 1/11/2017

MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY
PLANNING
1441 SCHILLING PL SOUTH, 2nd FLOOR, SALINAS, CA 93901
PHONE: (831) 755-5025 FAX: (831) 757-9516

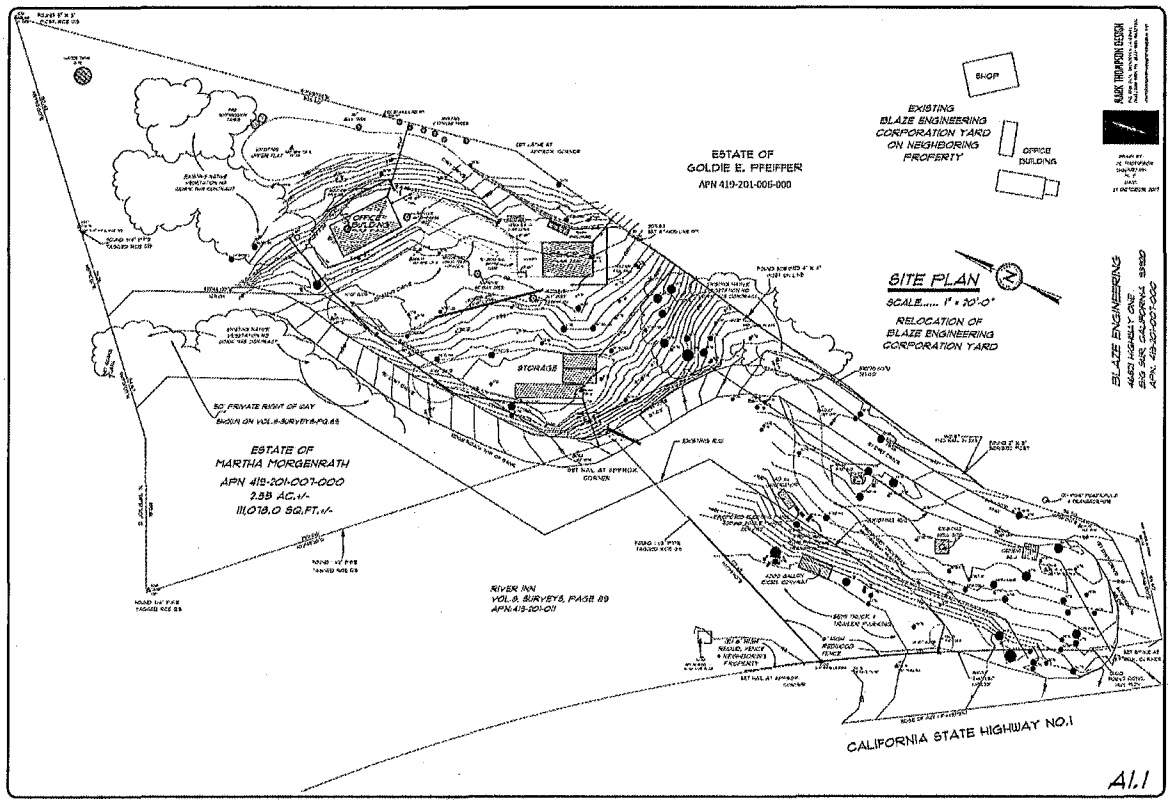
Project Title:	Morgenrath Martha J TR ET AL (Blaze Engineering)
File No.:	PLN160851
Project Location:	46821 Highway 1, Big Sur
Name of Property Owner:	Morgenrath Martha J TR ET AL
Name of Applicant:	Law Offices of Aengus L Jeffers
Assessor's Parcel Number:	419-201-007-000
Acreage of Property:	2.55 Acres
General Plan Designation:	Rural Community Center
Zoning District:	Visitor Serving Commercial, Design Control (Coastal Zone)
Lead Agency:	RMA-Planning
Prepared By:	Anna V. Quenga, Senior Planner
Date Prepared:	July 27, 2018
Contact Person:	Anna V. Quenga, Senior Planner
Phone Number:	(831) 755-5175

II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. Description of Project:

The Morgenrath project (Project) includes the establishment of a commercial business operation for Blaze Engineering on a vacant parcel zoned Visitor Serving Commercial, Design Approval, Coastal Zone or "VSC-D(CZ)". The proposed facilities on the site consist of: a 760 square foot office, a 600 square foot workshop, an 800 square foot storage unit, and equipment such as generators, a cement silo, and above ground diesel storage tanks. An onsite wastewater treatment system is proposed to provide wastewater service and potable water would be provided by a test well[1] converted into a permanent well. Site improvements require the removal of 16 protected trees, grading of 444 cubic yards of cut and 619 cubic yards of fill, and development on slopes in excess of 30%. The applicant, hereafter referred to as "Morgenrath" or "Blaze Engineering", requests a Combined Development Permit to erect the new facilities and commence use (Reference 1).

To put the Project in context, background information of Blaze Engineering's operations should be considered as the Project includes relocation of existing operations from one property to another. Between 1989 and 2017, Blaze's operations were conducted out of the adjacent property that borders the Morgenrath's eastern property line (Assessor's Parcel Number 419-201-006-000), hereafter referred to as the "former Blaze site". Morgenrath was notified that the lease of the adjacent property would no longer be available and the application for the Combined Development Permit was submitted to Monterey County (References 1 and 8).



[1] Coastal Administrative Permit (File No. PLN170051, Resolution No. 17-006) permitted drilling of a test well. As of preparation of this report, conditions of the permit have been meet and the well has been drilled.

Figure 1. Project Site Plan

The Project proposes to construct a 760 square foot on the Morgenrath property. Materials and colors consist of board and batt siding ("moss green" body with "frost white" trim), white framed vinyl windows, and a gray composition shingle roof. The storage containers[2], cement silo, generator, and diesel storage tanks are proposed to be moved from the former Blaze site to the Morgenrath property (**Figure 2**).

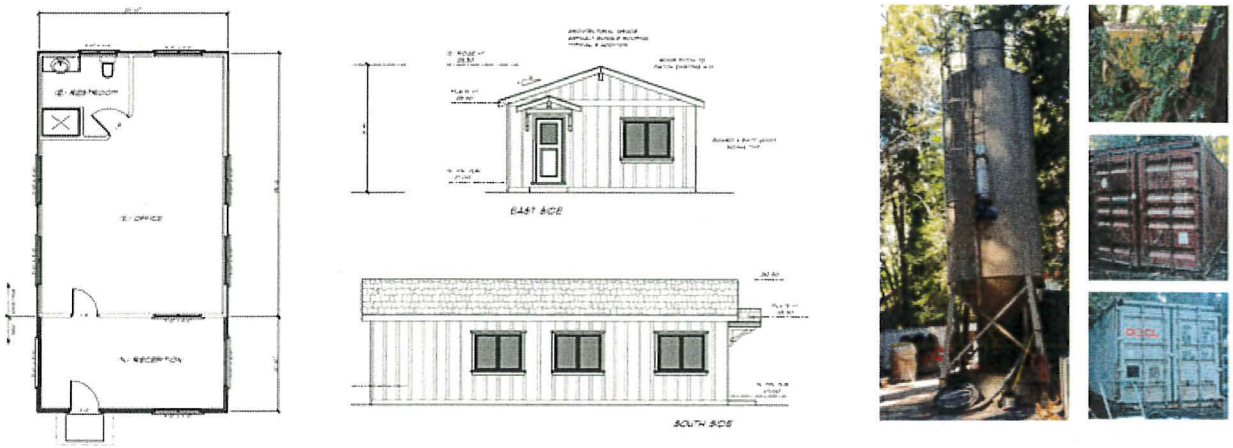
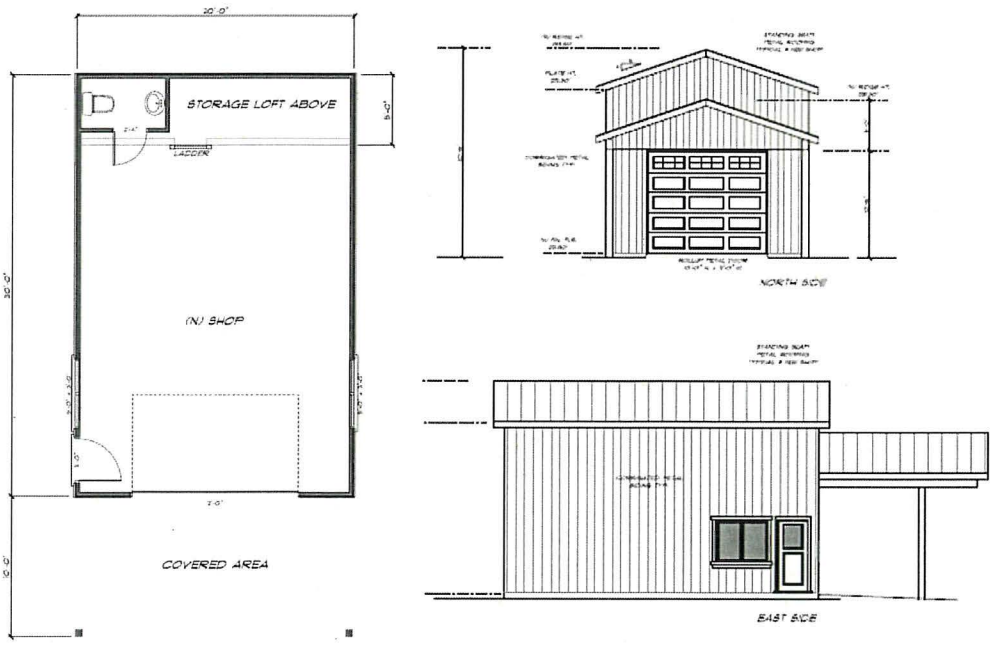


Figure 2. Office, Cement Silo, Generator, & Storage Containers

The proposed shop is intended to provide indoor space for maintaining and repairing contractor equipment when necessary (see **Figure 3**). The 21-foot tall pre-fabricated structure is proposed to be assembled onsite and consists of corrugated metal siding with a standing seam metal roof.



[2] On February 23, 2018, the County of Monterey issued a Design Approval (File No. PLN180139) allowing the temporary placement of (3) storage containers on the Morgenrath property until a permanent location for Blaze Engineering is secured.

Figure 3. Shop

Site improvements for the Project include grading, placement of structures, and/or placement of interior roadways on areas in excess of 30%. As demonstrated in **Figure 4**, these slope areas are at the office building, shop and adjacent soldier pile wall, the proposed Hilfiker wall, and proposed driveway off State Route 1. As also illustrated on **Figure 4**, the Project involves the removal of 16 trees, many of which are in hazardous conditions (References 1, 8, 9 and 16).

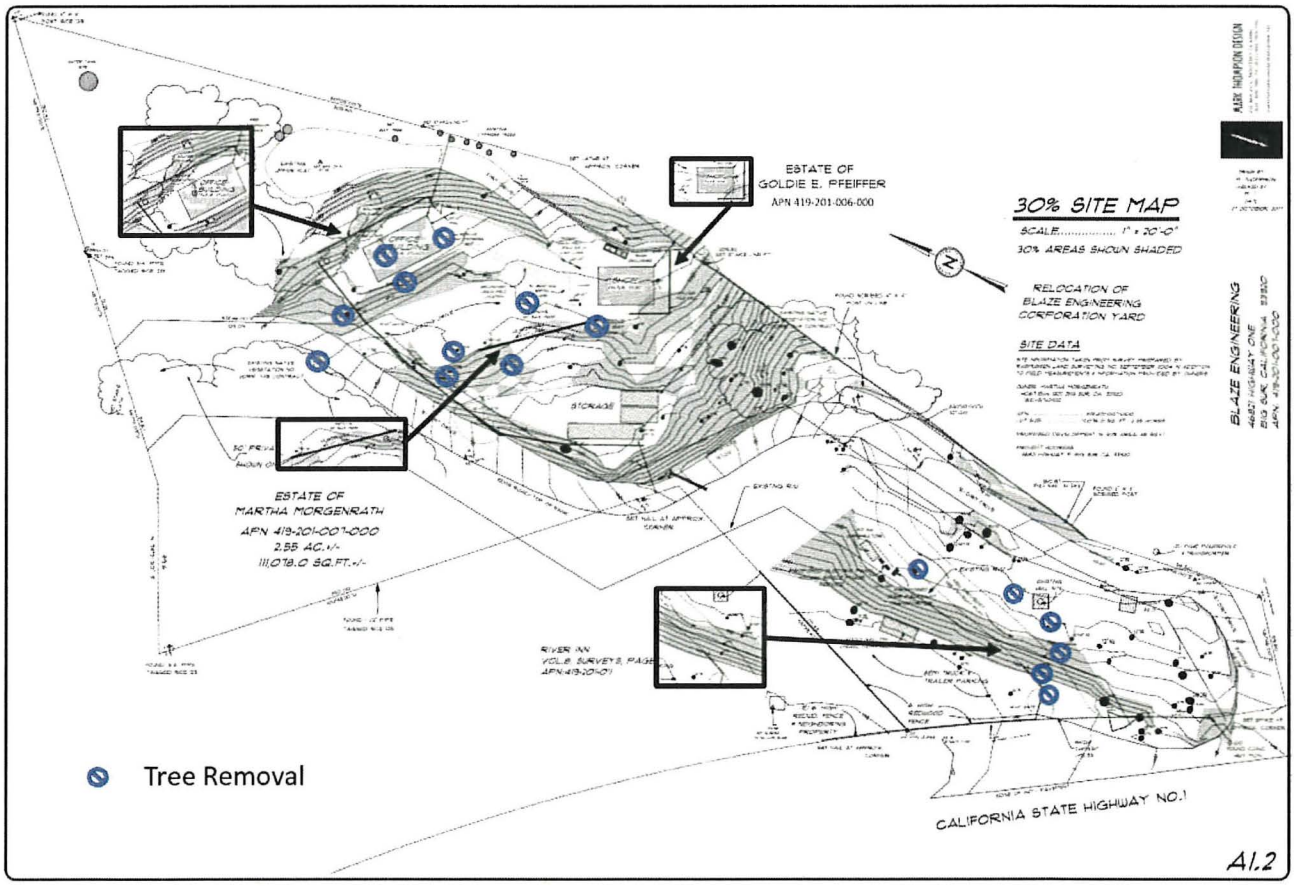


Figure 4. Development on Slopes in Excess of 30% & Tree Removal

Access to the site is provided by an existing driveway off State Route 1 (SR1). However, approximately 60-feet north of the existing driveway, the applicant proposes to construct a new driveway access with safer ingress and egress due to a greater line of sight distance (**Figure 5**). Parking of Blaze's large construction equiptment (trucks, trailers, dozers, etc.) is proposed within the existing flat dirt parking area adjacent to the new driveway (**Figure 7**). To screen parked vehicles, and as recommended by the public during the Big Sur Land Use Advisory Committee meeting, the applicant proposes a redwood fence between the parking area and and SR1. Blaze currently has 20 employees, including office staff and parking for administrative staff is proposed in an area located adjacent to the office and shop (**Figure 1** and References 1 and 18).

Examples of materias provided by Blaze includes concrete, rock, sand, and plumbing and landscape supplies and examples of services consist of grading, paving, installing water, septic, and electrical systems, and road building and repair. Blaze also provides heavy equiptment, fuel, and labor to the Big Sur area on an emergancy basis. For example, assistance to repair and re-

open damaged roads was provided during the 1998 El Nino, 2008 Basin Complex Fire, 2013 Pfeiffer Ridge Fire, 2016 Soberanes Fire, and 2017 landslide events. The Project is intended to allow Blaze Engineering to continue their operations and no new uses are proposed[3]. The ongoing component of the Project would provide a home base for Blaze's operation with office hours Monday through Friday from 8:00am to 4:30pm. However, on-call staff is available for emergency response. Associated activities on the site will be primarily for administrative, storage, and maintenance. Based on the goods and services Blaze provides, intensive construction activities would continue to occur off-site on their client's property.

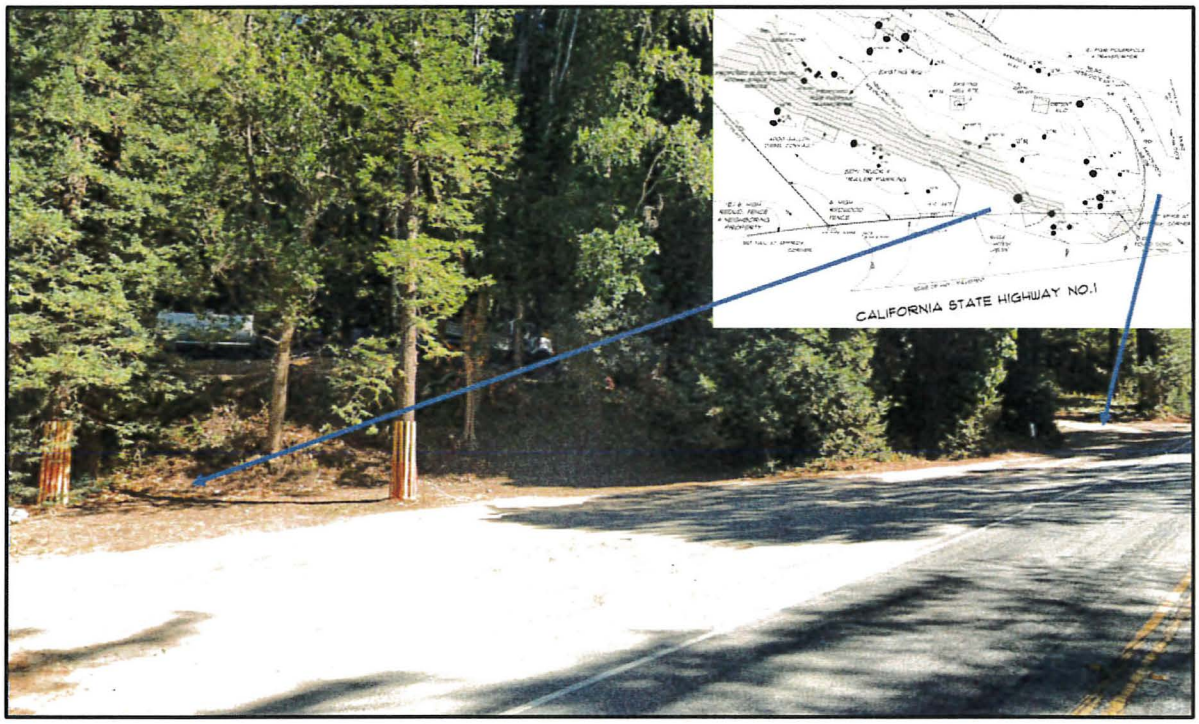


Figure 5. Existing and Proposed Access Driveway

B. Surrounding Land Uses and Environmental Setting:

The Morgenrath property is an oddly-shaped 2.55 acre parcel located on the eastern side of State Route 1 (SR1). Access to the site is provided by an existing driveway off SR1 and a right of way that traverses the property and provides access to nearby parcels. The Geotechnical report (Grice, Reference 12) describes the property to contain topography with "slight to moderate" slopes at elevations ranging between 180 to 280 feet above mean sea level. The lower elevation of the property is nearest SR1 while the higher elevation of the property is generally to the northeast (References 1 and 8). Soils range from fine sand to medium gravel with few amounts of silts and clays (Reference 12). The site is considered to be entirely within a Redwood Forest natural community dominated by coast redwood and co-dominated by California bay laurel. Tan oaks and coast live oaks are present but limited in numbers. Native understory plants are also limited

[3] Section 4.0 of the proposed General Development Plan (GDP, Source 1) describes future employee housing on the Morgenrath site in accordance with Policy 5.1.2 of the BSC LUP. Morgenrath does not seek permit approval for this use at this time and acknowledges that a separate permit will be required should they wish to establish in the future. Therefore, employee housing is not part of the Project or this environmental review.

due to invasive English ivy that dominates the understory vegetation (see Ballerini, Reference 11 and **Figure 6**).

Figure 6. On-Site Vegetation

The lower portion of the property contains a flat dirt parking area (**Figure 7**). This parking area is used by both Blaze Engineering to park their construction vehicles and parking for the River Inn Motel. The River Inn has motel units adjacent to the Morgenrath property and across SR 1 and the Morgenrath's have an existing agreement to share this portion of their property with the motel to provide off-street overflow parking (Reference 1).

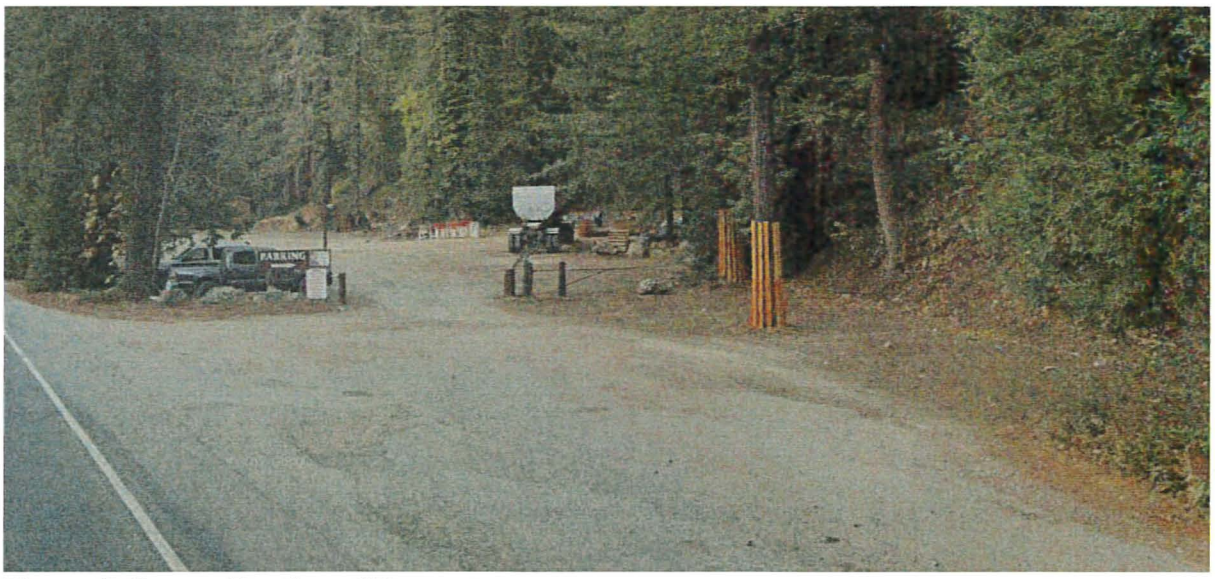


Figure 7. Lower Portion of Property

Other man-made improvements on the site include an improved road right-of-way, interior driveways, trails, and 3 level building pads (**Figures 8**). An existing, permitted test well is located on the lower portion of the property.

Figure 8. Right-of-Way, Driveway, and Upper Building Pad for Office (Top), Middle Building Pad for Shop (Bottom Left) and Lower Building Pad for Storage (Bottom Right)

Surrounding lands uses include rural residential parcels to the north, northeast, and east that range in size between 2 and 60 acres. Nearby visitor serving commercial uses such as inns, campgrounds, service stations, and restaurants, are found to the west and southwest. The Big Sur River is approximately 500-feet west of the site and Pheneger Creek, a tributary to the Big Sur River, is approximately 150-feet to the south.

The Morgenrath property is located within an area identified as the Big Sur Valley Rural Community Center (**Figure 9**). Pursuant to Section 5.3.2 of the BSC LUP, Rural Community Centers are areas with a special land use classification based on an existing variety of land use activities that provide essential services to the community and visiting public. Policies applicable

to these centers are intended to allow developments that would continue to provide a spectrum of functions to the public and residents of the area (References 3 and 4).

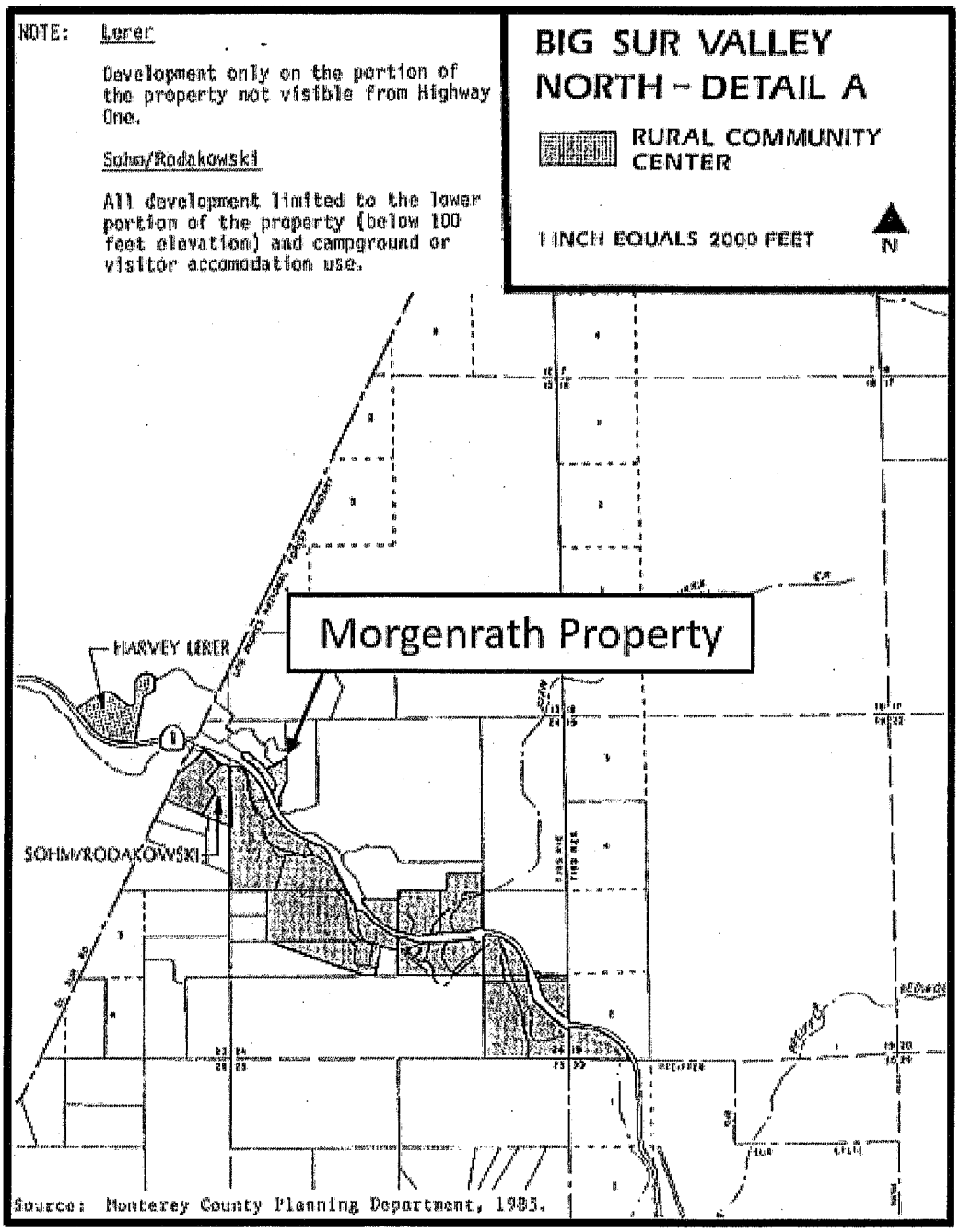


Figure 9. Rural Community Center – Big Sur Coast Land Use Plan

As previously stated, Blaze Engineering's operations were conducted from an adjacent property to the east for approximately 28 years (**Figure 10**). Therefore, as part of the baseline condition of the immediate vicinity, analysis of impacts resulting from the project includes effects to both the physical conditions of the Morgenrath property and the spatial and functional conditions of the area at the time the application for development was made.

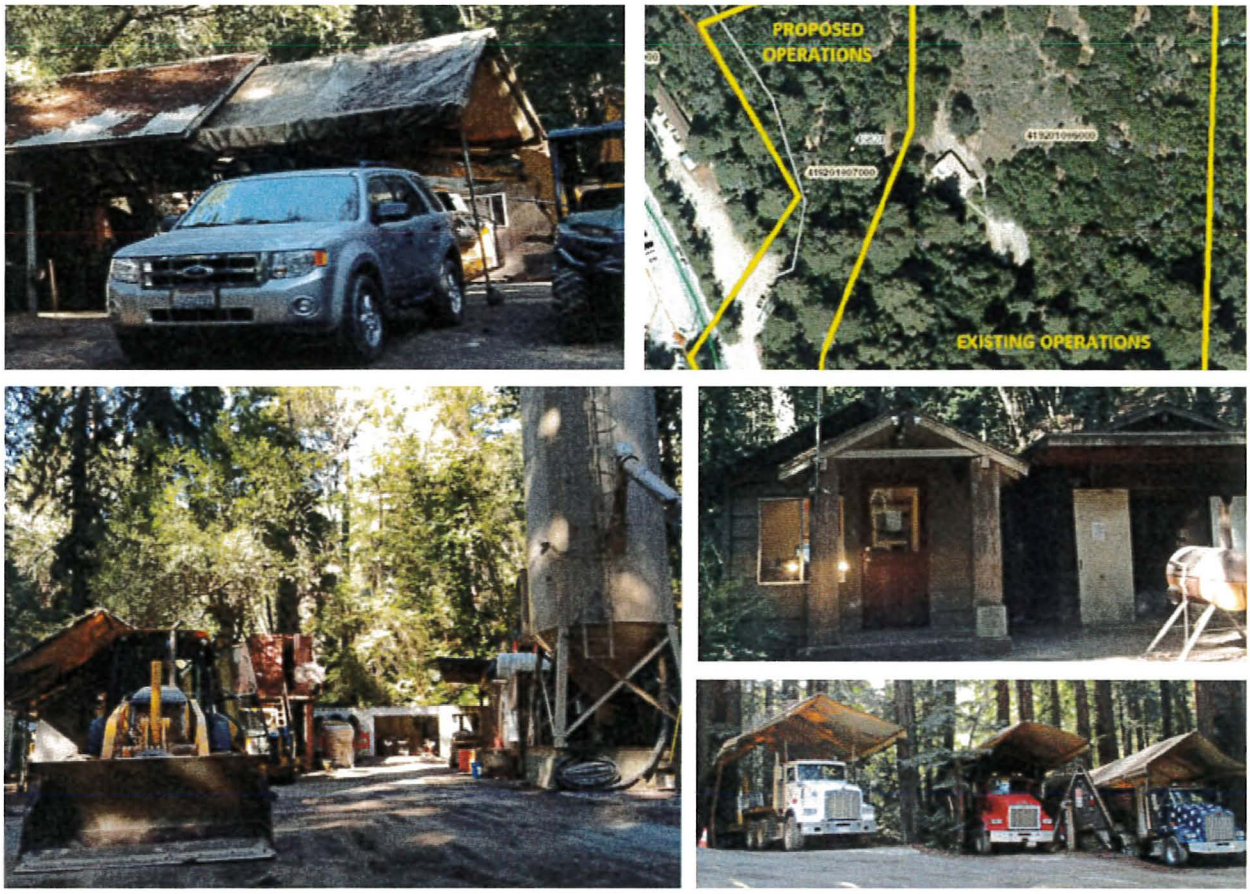


Figure 10. Blaze Engineering Operations on Adjacent Parcel (APN 419-201-006-000)

C. Other Public Agencies Whose Approval is Required:

The Project is entirely within the jurisdiction of the County of Monterey and approval from any outside agencies would not be required, other than an encroachment permit from Caltrans for the new driveway. County approval of the proposed permit is subject to appeal to or by the California Coastal Commission. In addition, obtaining ministerial construction permits would be required through the Monterey County Building Division, where review and approval by Cal Fire, Resource Management Agency-Public Works, Water Resources Agency, Environmental Health, and Resource Management Agency-Environmental Services Division would also occur.

D. Potential Project Impacts Identified:

The Morgenrath property is not located within an identified agricultural or State forest area and is not a mineral resource recovery site. Project implementation would not induce or reduce the population or availability of housing, or cause reduction of the existing level of services for fire, police, public schools, or parks. The project would not divide an existing community or conflict with policy and/or regulation adopted to avoid an environmental effect. Therefore, the project would have no impact on agricultural and State forest resources, land use/planning, mineral resources, population and housing, public services, recreation, or utilities and service systems. See further discussion in Section IV of this Initial Study.

Less than significant impacts have been identified for aesthetics, air quality, cultural resources, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water

quality, land use/planning, noise, and transportation and traffic (see Section VI, Environmental Checklist, of this Initial Study). Implementation of the project would incorporate conditions of approval to assure compliance with County requirements, some of which would reduce potential impacts to a less than significant level. Therefore, mitigation measures were not necessary for the Project to have a less than significant impact on these resources.

Potential impacts to biological resources and tribal cultural resources caused by site disturbance and the establishment of new structures resulting from Project implementation have been identified. Mitigation measures have been incorporated to reduce these potential impacts to a less than significant level (see Section VI, Environmental Checklist, of this Initial Study).

III. PROJECT CONSISTENCY WITH OTHER APPLICABLE LOCAL AND STATE PLANS AND MANDATED LAWS

Use the list below to indicate plans applicable to the project and verify their consistency or non-consistency with project implementation.

General Plan	☒	Air Quality Mgmt. Plan	☒
Specific Plan	☐	Airport Land Use Plans	☐
Water Quality Control Plan	☒	Local Coastal Program-LUP	☒

General Plan/Local Coastal Program LUP:
The Project was reviewed for consistency with the 1982 Monterey County General Plan (General Plan), the Big Sur Coast Land Use Plan (BSC LUP), and Monterey County Coastal Implementation Plans (CIP), Part 1 (Title 20) and Part 3 (BS CIP). The intent of the General Plan is to maintain and enhance the County's rural character, natural resources, and economic base by providing for adequate residential and industrial growth in areas best suited for development. The Monterey County Big Sur Coast Land Use Plan, North Section Map and Detail A, shows the Morgenrath property within an area defined as "Rural Community Center". This special land use classification is for areas where a variety of land use activities (inns, restaurants, service station, and commercial uses) exist. The goal of identifying Rural Community Centers is to provide policies that support the continuation of providing a spectrum of functions for both the visiting public and residents of the adjoining rural areas within areas with those established uses. As specified in Section 5.3.2 of the BSC LUP, locations of any of the established uses within the Rural Community Centers "is not a major concern and can best be determined upon review of individual, specific proposals." In general, any use allowed in any zone is appropriate for Rural Community Centers. Section 5.4.3.E of the BSC LUP calls for commercial uses to be directed to existing Rural Community Centers, carry out the rustic nature of Big Sur, and serve both local and visiting public. Existing commercial facilities are encouraged to expand and improve. Furthermore, during analysis of new or expanded commercial uses, impacts of the use on surrounding land, particularly where uses are in proximity to residences, shall be considered. The Blaze Engineering operations have had a long established service of providing residents and visitor serving commercial facilites of Big Sur with maintenance and repair of infrastructure during emergencies, such as fires and landslides, as well as normal "wear and tear". Relocation of the operation would: allow for utilization of the site consistent with the LUP, place activities with higher noise intensity to the lower portions of the site away from sensitive receptors, provide a parking facility with safer ingress and egress, and result in providing a greater distance between the operations and existing residential structures than that of the former site. Key Policy 3.2.1 of the BSC LUP prohibits all future public or private development visible from State Route 1 (SR1) and major public viewing areas (the Critical Viewshed), except for developments within Rural Community Centers as specified in Section 3.2.5.A of the BSC LUP. As discussed in Section VI.1 of this Initial Study, the project has been found to be consistent with the Visual Resources Policies of the BSC LUP. (References: 1, 2, 3, 4, 5, 6, and 8) **CONSISTENT**

Water Quality Control Plan

The Morgenrath property lies within Region 3 of the Central Coast Regional Water Quality Control Board (CCRWCB). Water quality objectives specified in the Water Quality Control Plan for the Central Coastal Basin are meant to protect existing high quality waters of the state and are considered necessary to protect present and future beneficial uses enumerated in Chapter Two of the plan. Primarily, these objectives are achieved through establishment of waste discharge requirements and implementation of the water quality control plan. Implementation of the Project would result in land disturbance and construction of permanent structures on a currently vacant parcel, potentially introducing new sources of water pollution or significantly increasing on-site impervious surfaces. Conversely, the capture of stormwater and its infiltration into the ground could potentially result in a benefit by recharging groundwater. In accordance with Chapter 16.12 of the Monterey County Code, the proposed project has been conditioned by the Water Resources Agency and RMA-Environmental Services requiring the applicant to submit a drainage and erosion control plan. For additional discussion on hydrology and water quality, please refer to Section VI.9 of this Initial Study. The CCRWQCB has designated the Director of Health as the administrator of the individual sewage disposal regulations, conditional upon County authorities enforcing the Regional Water Quality Control Plan, Central Coast Basin (Basin Plan). These regulations are codified in Chapter 15.20 of the Monterey County Code. The Environmental Health Bureau has reviewed the Project to and found the proposed septic design and location consistent with these regulations. For additional discussion on hydrology and water quality, please refer to Section VI.6 of this Initial Study. (References 1, 8, and 12) **CONSISTENT**

Air Quality Management Plan

Consistency with the Air Quality Management Plan (AQMP, Reference 20) is an indication of a project's ability to avoid contributing to a cumulative adverse impact on regional air quality (ozone levels), and is not an indication of project specific impacts, which are evaluated according to the Air District's adopted thresholds of significance. Inconsistency with the AQMP is considered a significant cumulative air quality impact. The Monterey Bay Air Resources District (MBARD) prepared the AQMP for the Monterey Bay Region. The AQMP addresses attainment and maintenance of State and Federal ambient air quality standards with the North Central Coast Air Basin. The Project does not include residential development and would not result in a population increase not already accounted for in the AQMP. On August 3, 2018, County staff consulted with MBARD staff and determined that the Project would not conflict with or obstruct implementation of the AQMP. There would be no change to current stationary emissions as a result of the Project. The MBARD *CEQA Air Quality Guidelines* (Reference 7) defines construction activities with potentially significant impacts for PM_{10} if they include 2.2 acres of disturbance per day. The Project would involve less than 2.2 acres of disturbance, and therefore would not result in a significant impact and would be consistent with the AQMP (see project description in previous Section II of this Initial Study). Additional discussion can be found in Section VI.3 – Air Quality, in this Initial Study. (References 1, 7, 8, and 20) **CONSISTENT**

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

A. FACTORS

The environmental factors checked below would be potentially affected by this project, as discussed within the checklist on the following pages.

☒ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Geology/Soils
☒ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials	☒ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☒ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☒ Transportation/Traffic	☒ Tribal Cultural Resources	☐ Utilities/Service Systems
☒ Mandatory Findings of Significance		

Some proposed applications that are not exempt from CEQA review may have little or no potential for adverse environmental impact related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a non-sensitive environment, and are easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impact (and not checked above), the following finding can be made using the project description, environmental setting, or other information as supporting evidence.

☐ Check here if this finding is not applicable

FINDING: For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation or maintenance of the proposed project and no further discussion in the Environmental Checklist is necessary.

EVIDENCE: Section VI.2 – Agricultural and Forest Resources: Data contained within the Monterey County Geographic Information System (GIS) identifies that the subject property does not contain farmland designated as Prime, Unique, of Statewide or Local Importance, or under Williamson Act contract. There were no ongoing agricultural uses on the Morgenrath property, or in the vicinity, observed during

staff's onsite visit. Therefore, Project would not result in conversion of prime agricultural lands to non-agricultural uses or impact agricultural resources. Although the biological report (Ballerini, Reference 10) indicates that the site is entirely within a Redwood Forest natural community, it is not considered a forest or timber resource inventoried as "Demonstration State Forest" and the project would have no impact on forest resources. (Reference: 1, 3, 6, and 8) *No Impact.*

Section VI.3 – Air Quality: On August 3, 2017, County staff consulted with Monterey Bay Air Resources District (MBARD) staff to determine the Project's compliance with the Air Quality Management Plan (AQMP) and potential impacts to air quality. The Project includes the relocation of an existing operation from the former Blaze site to the Morgenrath property. From an air quality standpoint, this results in no change the baseline of the surrounding area. The relocation would not make any changes to operations that would cause an increase in air pollutants other than temporary impacts associated with construction (Project Plans and General Development Plan, Reference 1). The Construction Management Plan (Reference 1) submitted with the application limits proposed grading for site improvements to no more than 100 cubic yards per day and would not involve moving dirt exceeding the PM_{10} threshold of 2.2 acres of disturbance per day. All other construction emissions are accounted for in the AQMP. (References 1 & 7) *No Impact.*

Section VI.10 – Land Use and Planning: The Project involves the relocation of a commercial operation with an established long-term continuous use from one property (APN 419-201-006-000) to an adjacent property (APN 419-201-007-000). The proposed use would not conflict with any applicable regulation adopted for the purpose of avoiding or mitigating an environmental effect. In fact, as stated in Section III above, the project is consistent with the special land use classification of Rural Community Center specified in the Big Sur Land Use Plan. A habitat conservation plan or natural community conservation plan is not adopted for the project area. (Reference: 1, 2, 3, 4, and 8) *No Impact.*

Section VI.11 – Mineral Resources: The Monterey County Geographic Information System (GIS) and a site visit conducted by staff verifies that there are no mineral resources for commercial use on the site. Therefore, implementation of the Project would have no impact on mineral resources. (Reference: 1, 3, 6, 8, 12 and 14) *No Impact.*

Section VI.13 – Population/Housing: Implementation of the Project would establish a commercial operation on a commercially zoned parcel. The operation would replace the former Blaze Engineering operation on an adjacent property. No change in the number of employees would result from a relocation of the business. The relocated business would be of the same scale and square footage as the existing business site and would not in itself allow an expansion or intensification of the business operations. Therefore, the use would not cause an increased demand for additional housing. The Project does not involve residential

development and therefore would not result in a substantial increase of housing units in the area. The Project would not substantially induce population growth in the area, either directly or indirectly, as no new public infrastructure would be extended to the site. Therefore, the proposed project would have no significant impacts related to population and/or housing. (Reference: 1, 2, 3, and 4) *No Impact.*

Section VI.14 – Public Services: Implementation of the Project would establish a commercial operation on a commercially zoned parcel. The operation would replace the former Blaze Engineering operation on an adjacent property. No change in the number of employees would result from a relocation of the business. The relocated business would be of the same scale and square footage as the existing business site and would not in itself allow an expansion or intensification of the business operations. The Project would not require new, or cause a physical alteration of existing, governmental facilities (resulting in construction that would cause significant environmental impacts) in order to maintain acceptable service ratios, response times or other performance objectives for public services. (Reference: 1, 2, 3, and 4) *No Impact.*

Section VI.15 – Recreation: Implementation of the Project would establish a commercial operation on a commercially zoned parcel. The operation would replace the former Blaze Engineering operation on an adjacent property. No change in the number of employees would result from a relocation of the business. The relocated business would be of the same scale and square footage as the existing business site and would not in itself allow an expansion or intensification of the business operations. Therefore, the Project would not result in a significant increase of the use of existing neighborhood and regional parks or other recreational facilities, causing substantial physical deterioration. The Project does not include or require construction or expansion of recreation facilities. The Project would not create significant recreational demands. (Reference: 1, 2, 3, and 4) *No Impact.*

Section VI.17 – Utilities: Implementation of the Project would require the installation of an onsite wastewater treatment system, allow conversion of a test well (approved by an earlier application, File No. PLN170051 Resolution No. 17-006) to a permanent well to provide domestic water service, and require creation of an onsite stormwater drainage facility. Therefore, the proposed project would not require connection to any public wastewater, stormwater, or water facilities. Any excess construction materials would be hauled on State Route 1 to the landfill outside Marina operated by the Monterey Regional Waste Management District. However, the minimal amount of waste produced would not affect the permitted landfill capacity. (Reference 1 and 8) *No Impact.*

B. DETERMINATION

On the basis of this initial evaluation:

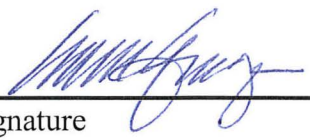
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

8/31/2018

Date

Anna V. Quenga, Senior Planner

V. EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).

2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista? (Reference: 1, 3, 4, 5, 6, 8, & 17)	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Reference: 1, 3, 4, 5, 6, 8, 17, & 18)	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings? (Reference: 1, 3, 4, 5, 6, 8, & 17)	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Reference: 1, 3, 4, 5, 6, 8, & 17)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
Key Policy 3.2.1 of the Big Sur Land Use Plan (BSC LUP) prohibits all future public or private development visible from State Route 1 (SR1) and major public viewing areas (the Critical Viewshed). As demonstrated in **Figure 11** below, the Morgenrath property is off of SR 1 and within the defined Critical Viewshed.

Section 3.2.5.A of the BSC LUP provides an exception to Key Policy 3.2.1 for development within Rural Community Centers, which were established to provide essential services to the community and visiting public. Map entitled Big Sur Valley North – Detail A contained in the BSC LUP illustrates that the Morgenrath property is within the Big Sur Valley Rural Community Center (**Figure 9**). In accordance with the policy above, the proposed development would be permitted under siting and design controls provided in Title 20 (coastal zone regulations) and subsequent Policy 5.4.3 of the BSC LUP. Subsection E of Policy 5.4.3 requires commercial development to carry out the rustic character of Big Sur, provide an adequate physical area to meet parking requirements and natural resource concerns, prohibits large scale commercial facilities that are unlike existing character and size of facilities in Big Sur. In addition, parking areas are required to be screened from public views from Highway 1 and should, in no event, create hazards for motorists or pedestrians.

Zoning of the property includes a Design Control District overlay and the Project is therefore subject to the requirements set forth in Section 20.44 of Title 20, which provides regulations for the location, size, configuration, materials and colors of structures and fences to assure protection of the public viewshed, neighborhood character, and visual integrity without imposing undue restrictions on private property.

The Big Sur Coast Highway Management Plan (CHMP) provides guidelines for SR1 corridor aesthetics (Caltrans, Reference 17), which are intended to provide a source of values and direction, focusing on highway construction, maintenance, and operational practices to roadside features within and beyond the right of way. Although the CHMP is not a regulatory document, it is utilized as a resource to analyze Project components that encroach upon and are within proximity to the right of way and ensure they do not impact the scenic value of SR1.

Figure 11. Views of Morgenrath from State Route 1

1(a), (b), (c), and (d). Conclusion: Less Than Significant Impact.
Implementation of the Project would have the potential to adversely affect a scenic vista, scenic resources, degrade the existing visual character of the area, and create a new source of substantial light or glare that would affect nighttime views. As discussed above, the Morgenrath property is within view of SR1, and although the proposed development is exempt from Critical Viewshed requirements, the scenic and rural character of Big Sur is considered an important environmental resource. Hence, careful siting and design of the structures, the proposed new driveway off SR1, and improvements of the lower parking area is necessary for both compliance with the BSC LUP and reducing impacts to a less than significant level. During a site visit performed by staff (Quenga, Reference 8), staking and flagging of the proposed office, shop, storage areas (**Figure 8**), and cement silo (**Figure 12** below) areas were observed to determine potential impacts. The Blaze Engineering Operations conducted out of the adjacent parcel (APN 419-201-006-000) were also observed during that site visit for perspective purposes (**Figure 10**).

Exterior lighting for the Blaze operation is addressed in the General Development Plan. Lighting would be limited to the entrances and exits of the office and workshop and are proposed to have recessed lighting elements where the light source would not be visible from the highway. The plan requires the use of exterior lights that are unobtrusive, down-lit, compatible with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. Therefore, implementation of the Project, as proposed and with county standard conditions of approval for visually sensitive areas, would have a less than significant impact to scenic resources due to a new source of light on the Morgenrath property.

Figure 12. Staking of Silo (Left & Middle) and Existing Silo on Adjacent Property (Right)

The silo is proposed approximately 60-feet from SR 1. As shown in **Figure 13** below, the photo in the middle was taken from the existing right of way (the area identified with a "star" on the site plan on the left) facing towards staking of the silo (the area clouded on the site plan on the left) and State Route 1. The photo on the right is a view of the silo area taken from the edge of State Route 1.

Figure 13. Partial Site Plan (Left), Photo of Silo Staking and State Route 1 (Middle), and Silo Area Viewed from State Route 1

Parking of Blaze's large construction equipment (e.g. trucks, trailers, dozers) within the existing parking area on the lower portion of the Morgenrath property is the project component that would have the greatest potential to create a significant impact when viewed from SR1 (see **Figure 14** below).

Figure 14. Aerial of Parking Lot (Left), View of Parking Lot from the South (Top Right), and View of Parking Lot from the North (Bottom Right)

The existing vegetation and topography of the site is such that staking and flagging of the office, shop, and storage areas could not be seen from SR1. Due to its proximity to SR1, the silo has potential to be seen from the roadway. However, views would be obscured from the existing vegetation. Trees proposed for removal would not expose the proposed structures to views from SR1. Therefore, impacts to scenic resources and the scenic character of the area have been identified to be less than significant based on the siting of the structures, vegetation, and topography.

Although the parking area is currently being utilized for parking of Blaze Engineering's equipment and overflow parking for the River Inn Motel, implementation of the project would result in more frequent use by Blaze. Unlike the operation on the former Blaze site, this project does not provide parking for large construction vehicles on the upper portion of the Morgenrath property. This increase in parking was a noted concern during the Big Sur Land Use Advisory Committee meeting (LUAC, Reference 18). A member of the public stated that they support the project but suggested equipment, trucks, and structures be shielded from view. The applicant has agreed to include additional screening and proposes to install a 6 foot high redwood fence on the western portion of the property along SR1. This fence has been incorporated into the project design as demonstrated on the Site Plan page A1.1 of Reference 1 and **Figure 1**. The proposed Redwood fence is consistent with the rural character of Big Sur and fencing guidelines contained in the CHMP; visual impacts from SR1 have been reduced to less than significant by project design.

2. AGRICULTURAL AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (Reference: 1, 3, 6, & 8)	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (Reference: 1, 3, 6, & 8)	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (Reference: 1, 3, 6, & 8)	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use? (Reference: 1, 3, 6, & 8)	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (Reference: 1, 3, 6, & 8)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

See previous Section II.B (Project Description) and C (Environmental Setting) and Section IV.A (Environmental Factor Potentially Affected), as well as the References listed.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan? (Reference: 1 & 7)	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Reference: 1 & 7)	☐	☐	☐	☒
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (Reference: 1 & 7)	☐	☐	☐	☒
d) Result in significant construction-related air quality impacts? (Reference: 1 & 7)	☐	☐	☐	☒
e) Expose sensitive receptors to substantial pollutant concentrations? (Reference: 1 & 7)	☐	☐	☐	☒
f) Create objectionable odors affecting a substantial number of people? (Reference: 1 & 7)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

See previous Section II.B (Project Description) and C (Environmental Setting) and Section IV.A (Environmental Factor Potentially Affected), as well as the References listed.

4. BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Reference:1, 2, 3, 4, 6, 8, 9, & 11)	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Reference:1, 2, 3, 4, 6, 8, 9, & 11)	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Reference:1, 2, 3, 4, 6, 8, 9, & 11)	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Reference:1, 2, 3, 4, 6, 8, 9, & 11)	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Reference:1, 2, 3, 4, 6, 8, 9, & 11)	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (Reference:1, 2, 3, 4, 6, 8, 9, & 11)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Monterey County Geographic Information System (GIS) and the Big Sur Coast Local Coastal Program Environmentally Sensitive Habitat Areas (ESHA) map indicates that the Morgenrath property has the potential to contain rare, endangered, or sensitive plant habitats. Policy 3.3.1 of the Big Sur Land Use Plan (BSC LUP) and Section 20.145.040 of the Coastal Implementation Plan (CIP) require the preservation of environmentally sensitive habitats through the implementation of development standards that maintain, restore, and if possible, enhance ESHA. In accordance with these regulations, a biological survey (Ballerini, Reference 11) was submitted

to identify ESHA on the property and determine if the Project would have the potential to result in an impact to that ESHA.

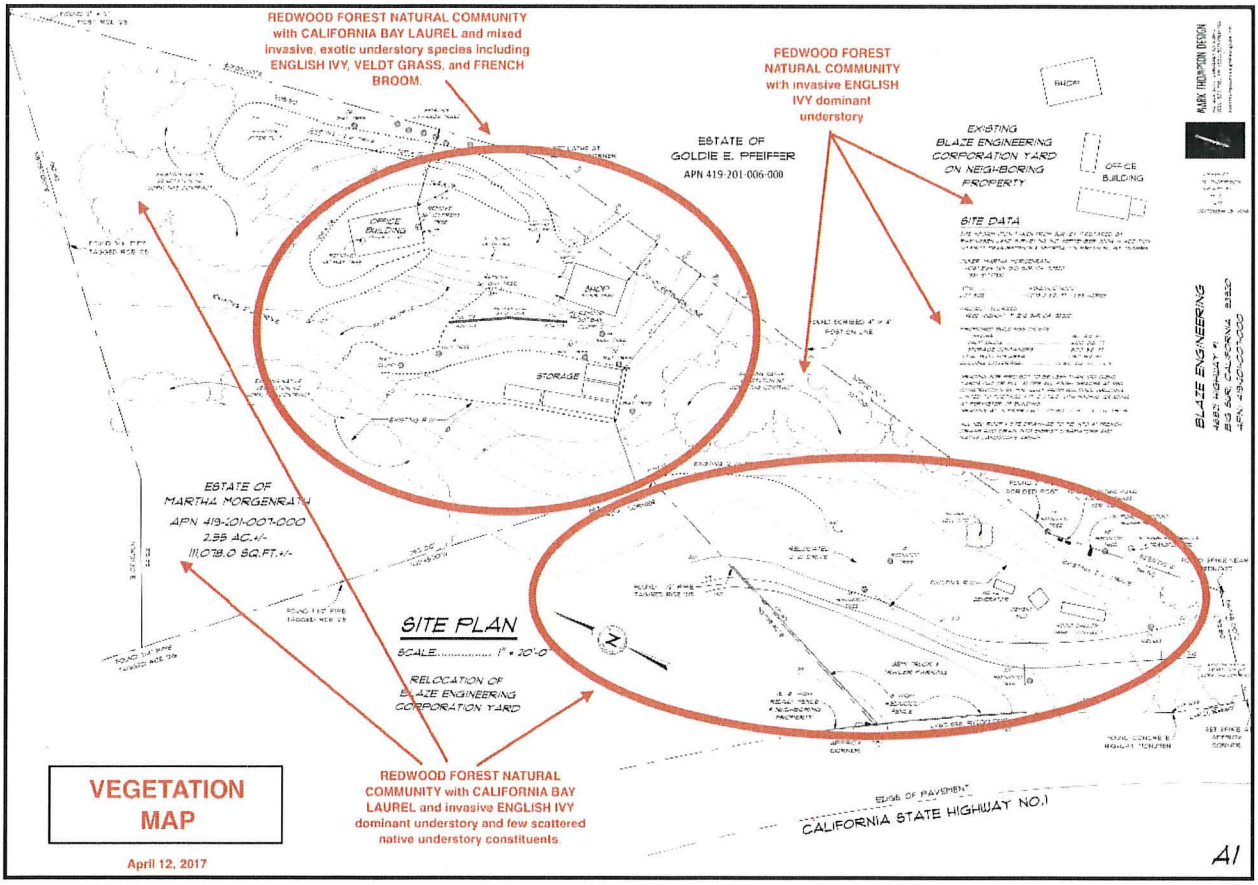


Figure 15. Vegetation Map Prepared by Fred Ballerini

Ballerini notes, and as shown in **Figure 15** above, the Morgenrath property lies entirely within a Redwood Forest natural community dominated by coast redwood (Sequoia sempervirens) and co-dominated by California bay (Umbellularia California). Tan-oak (Notholithocarpus densiflorus), coast live oak (Quercus agrifolia), and Shreve oak (Quercus parvula var. shrevei) were also found onsite, but in limited amounts. Very little native understory plants, such as sword fern (Polystichum munitum), thimbleberry (Rubus parviflora), Douglas' iris (Iris douglasiana), redwood sorrel (Oxalis oregana), California hedgenettle (Stachys bullata), and poison oak (Toxicodenron diversilobum), were found onsite as non-native invasive English ivy (hedera helix) dominates the understory and is found climbing up the trunks of many onsite trees.

4(c) and (f). Conclusion: No Impact.
Available resource data (GIS, Reference 6), observation by staff (Quenga, Reference 8), and information contained in the biological report (Ballerini, Reference 11) indicates that the Morgenrath property does not support federally protected wetlands and is not under provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other approved conservation plan. Therefore, implementation of the Project would have no impacts to these biological resources.

4(d). Conclusion: Less Than Significant.
The biologist (Ballerini, Reference 11) surveyed the Morgenrath property to identify if any native resident or migratory fish or wildlife species were onsite or if the property was within a migratory wildlife corridor. Although no special-status species were found and the potential for species to be onsite was determined to be low, the Project includes the removal of trees and construction in proximity of trees. Therefore, a standard condition of approval has been incorporated into the project requiring the applicant to submit a nest survey if tree removal or construction activity commences during the typical bird nesting season, consistent with the Migratory Bird Treaty Act of 1918. Implementation of this condition would reduce potential impacts to nesting birds to a less than significant impact.

4(a), (b), and (e). Conclusion: Less Than Significant Impact with Mitigation Incorporated.
The Project would utilize existing disturbed areas such as roadways, building pads, and an existing parking area resulting in siting and a design that minimizes disturbance to biological resources to the maximum extent feasible. However, the site contains Redwood Forest natural community and the proposed construction and tree removal would occur in proximity of areas identified as ESHA. BSC LUP Policy 3.3.2.1 states that development, including vegetation removal, shall not be permitted in ESHA if it would result in any potential disruption of habitat value. To approve development within any of these habitats the County must find that disruption of a habitat caused by the development is not significant.

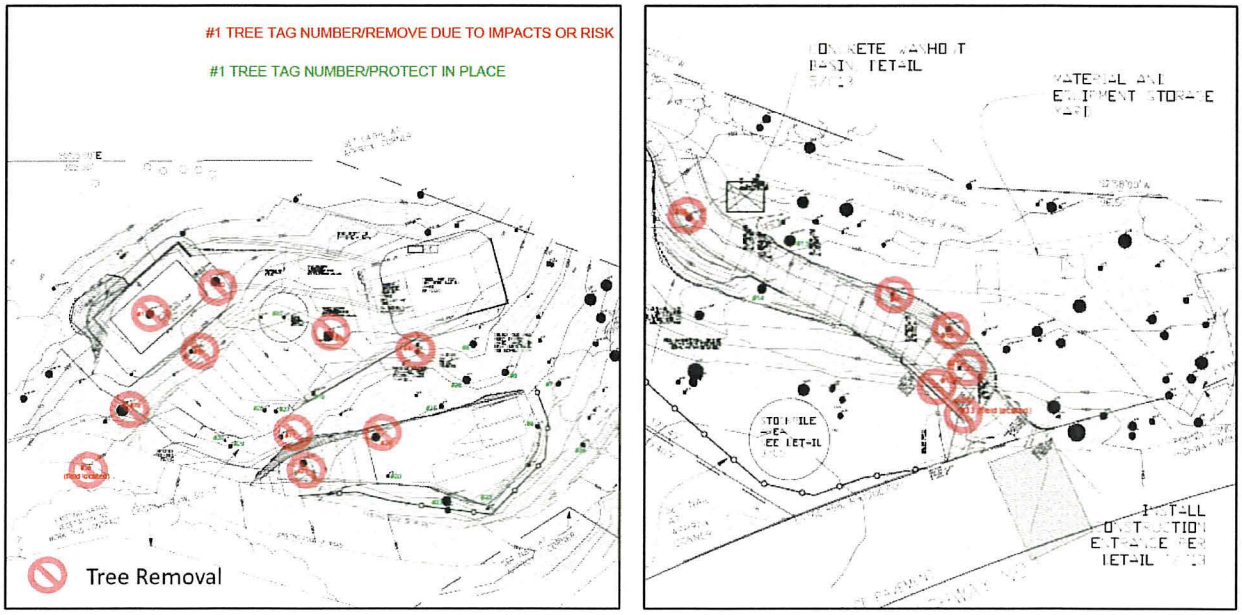


Figure 16. Tree Removal Map Prepared by Maureen Hamb

The tree evaluation (Hamb, Reference 9) prepared for the Project identified coast redwoods on the property to be in fair to good condition and California bay laurels in various stages of decline due to structural defects, fungal infestations by Ganoderma and Sudden Oak Death disease. Out of the 34 trees inventoried, 16 are proposed for removal (**Figure 16**). As demonstrated in the table found in Hamb's report, 5 trees would be removed due to construction impacts (tree Nos. 2, 10, 12, 21, and 31), 6 due to their hazardous condition and construction impacts (trees Nos. 1, 4, 9, 11, 15, and 24), and 5 due to their hazardous condition (tree Nos. 3, 16, 17, 18, and 33). Hamb

concludes that the proposed tree removal is minimum necessary for development and to reduce the risk of tree failure that would be a hazard to people or structures. Removal would not result in the fragmenting of an intact forest system, create a new forest edge, or impact the existing quality of the system (Reference 9). The Project plans (Construction Management Plan, Reference 1) provides notes for the protection of trees. In order to ensure construction activities do not inadvertently cause harm to trees to be retained, additional tree protection measures have been recommended. These measures are recommended as part of a Tree Protection Fencing plan that shall work in conjunction with the final Construction Management Plan approved with the grading and/or building permit for the Project.

The biological report (Ballerini, Reference 11) identifies recommended actions and concludes that through implementation of those actions, the Project would have a less than significant impact on special natural communities. Furthermore, protection and restoration measures have been recommended to enhance ESHA and provide for long-term land management and exotic species control. The Project plans (Construction Management Plan and Conceptual Restoration & Fuel Management Plan, Reference 1) provides notes for exotic species control, best management practices, thinning of invasive plants, and site restoration. To ensure proper implementation of measures occur, consistent with the recommendation by the biologist, these measures shall be incorporated within a final Construction Management Plan and Conceptual Restoration & Fuel Management Plan approved with the grading and/or building permit for the Project.

Mitigation Measure No. 1: *Monitoring of Grading and Construction Activities.* For the protection of tree resources and to ensure grading and construction activities are conducted in accordance with the recommendations contained in the Tree Resource Evaluation Project Impact Analysis (Planning File LIB170437), the owner/applicant shall enter into a contract with a certified arborist (project arborist) and the contract shall include:

- Review the construction documents (Grading and/or Building plans, Tree Protection Fencing plan and Construction Management Plan) to verify consistency with the preliminary plans and the Tree Resource Evaluation Project Impact Analysis.
- Review and approval of the protective fencing plan in accordance with **Mitigation Measure No. 2.**
- Review and approval of grading, building, and construction management plans (including any future modified construction plans) for consistency with and incorporation of **Mitigation Measure No. 3.**
- The owner/applicant shall delegate responsibility and authority to the project arborist to stop construction in the event the work is found to be inconsistent with the approved plans, BMP's, or if tree resources are not adequately protected. The contractor and project arborist shall develop a plan to remediate and/or revise procedures and methods to accomplish the objective of **Mitigation Measure Nos. 2 and 3.**
- Prepare and submit a final report to RMA-Planning for review and approval indicating that the protection measures in place were successful.

Mitigation Measure Monitoring Action No. 1a: Prior to the issuance of construction permits for grading or building, the owner/applicant shall submit to RMA-Planning a copy of the contract between the owner/applicant and a certified arborist (referred to as

the *project arborist*) for review and approval. Should RMA-Planning find the contract incomplete or unacceptable, the contract will be returned to the owner/applicant and a revised contract shall be re-submitted for review and approval.

Mitigation Measure Monitoring Action No. 1b: In the event work is stopped by the project arborist due to inconsistency with the approved plans, BMP's, or if tree resources are not adequately protected, the owner/applicant shall submit a remediation plan outlining revised procedures and/or methods, prepared by the contractor and project arborist, that accomplishes the objectives of **Mitigation Measure Nos. 2 and 3**. This plan, and evidence of successful implementation shall be submitted to RMA-Planning for review and approval.

Mitigation Measure Monitoring Action No. 1c: Prior to final inspection of construction permits for grading or building, the owner/applicant shall submit a final report prepared by the project arborist demonstrating monitoring of grading and construction activities occurred and met the requirements specified in **Mitigation Measure Nos. 1, 2, and 3** to RMA-Planning for review and approval.

Mitigation Measure No. 2: *Tree Protection.* In order to prevent construction activities from damaging trees within the tree protection zone, the owner/applicant shall develop a Tree Protection Fencing plan for all trees within 30-feet of the development area. The plan shall be developed in consultation with the project arborist and submitted to RMA-Planning for review and approval. The Tree Protection Fencing plan shall demonstrate how the following measures shall be implemented:

- Demarcate installation of protection fencing consistent with the recommended plan found on page 15 of the "Tree Resource Evaluation Project Impact Analysis", dated October 6, 2017 (Monterey County Document No. LIB170437), prepared by Maureen Hamb-WCISA.
- Provide protection fencing along the critical root zones of the coast redwood trees near the development area.
- Provide special protection methods for Tree Nos. 13 (52-inch Coast redwood) and 14 (40-inch Coast redwood). Due to their proximity of the proposed driveway, exclusionary fencing will not be possible. Protection shall occur by using straw bale barricades secured to the tree trunks.
- Place straw bales, from end to end, inside of the protection fencing to act as a barricade to limit damage to the fencing, prevent grading spoils from encroaching into the critical root zone area, and prevent excess moisture from gathering under the retained trees.
- Maintain the natural grade around trees. Grading shall not be permitted to sever major roots of redwood or oak trees. No additional fill or excavation shall be permitted within the critical root zone of trees. If major tree roots that are 2-inches or greater are unearthed during the construction process, the project arborist shall be notified immediately. Work shall be halted and roots shall be covered with moistened burlap until a determination is made by the project arborist.
- Unauthorized pruning of any tree shall be prohibited. Any required pruning shall be done on the authority of the project arborist and to the International Society of Arboriculture

(ISA) pruning guidelines and Approved American National Standard (ANSI) A300 pruning standards.
- All trenching onsite shall be approved by the project arborist.

Mitigation Measure Monitoring Action No. 2a: Prior to approval of construction permits for grading and building, the owner/applicant shall develop and submit a Tree Protection Fencing plan, as described in **Mitigation Measure No. 2**, to RMA-Planning for review and approval. The approved Tree Protection Fencing plan shall be incorporated into the approved set of job-site and office-copy construction plans for grading and/or building.

Mitigation Monitoring Action No. 2b. Prior to issuance of construction permits for grading and building, the owner/applicant shall provide evidence to RMA-Planning documenting installation of the protective fencing and straw bale barriers for review and approval.

Mitigation Monitoring Action No. 2c. Prior to final of construction permits for grading and building, the owner/applicant shall submit documentation that implementation of the Tree Protection Fencing plan has been successful to RMA-Planning for review and approval.

Mitigation Measure No. 3: *Construction Management Plan.* In order to ensure best management practices are followed during construction activities, the owner/applicant shall prepare a final Construction Management Plan. The plan shall be consistent with the preliminary drawing, developed in consultation with the project arborist, and submitted to RMA-Planning for review and approval. In addition to the notes contained in the preliminary plan, the final Construction Management Plan shall demonstrate how the following measures shall be implemented:

- Storage of construction materials, debris, or excess soil shall be prohibited within the tree protection zone.
- Solvents or liquids of any type shall be disposed of properly.
- Use of heavy equipment shall be restricted to areas within the construction envelope.
- Delineate approved areas for material storage and parking of vehicles/construction equipment.
- Any excavated material shall not be deposited beyond the edge of the driveway. Site erosion shall not be permitted to enter areas supporting natural communities beyond the impact perimeter of the development.
- Prior to final grading, all construction debris shall be removed from the site.

Mitigation Measure Monitoring Action No. 3a: Prior to approval of construction permits for grading and building, the owner/applicant shall develop and submit a final Construction Management Plan, as described in **Mitigation Measure No. 3**, to RMA-Planning for review and approval. The approved Construction Management Plan shall be incorporated into the approved set of job-site and office-copy construction plans for grading and/or building.

Mitigation Monitoring Action No. 3b. Prior to final of construction permits for grading and building, the owner/applicant shall submit documentation that implementation of the Construction Management Plan has been successful to RMA-Planning for review and approval.

Mitigation Measure No. 4: *Restoration and Fuel Management Plan.* In order to eradicate invasive plant species and enhance and maintain native habitats onsite, the owner/applicant shall prepare a final Restoration and Fuel Management Plan. The plan shall be consistent with the preliminary drawing and submitted to RMA-Planning for review and approval. In addition to the notes contained in the preliminary plan, the final Restoration and Fuel Management Plan shall demonstrate how the following measures shall be implemented:

- Prior to grading activities, invasive plant species, shall be eradicated within the development area, including English Ivy that envelops tree trunks and canopies, and compromises the health of established coast redwood and California bay trees. Removal of invasive plant species shall be done by hand to prevent spreading of seeds or rhizomes.
- All disturbed soil generated during any site grading shall be kept free of exotic plant species.
- During construction, disturbed soils shall be stabilized in accordance with approved erosion control measures.
- During construction, disturbed soils and areas where equipment and personnel are concentrated shall be mulched to reduce compaction, retain soil moisture, and stabilize soil temperature.
- After completion of soil disturbance activities, disturbed soils shall be stabilized with plant species identified on the "Restoration Seeding List" found on the Conceptual Restoration and Fuel Management Plan. Planting shall be installed in the fall months prior to, or in conjunction with, seasonal rains.

Mitigation Measure Monitoring Action No. 4a: Prior to approval of construction permits for grading and building, the owner/applicant shall develop and submit a Restoration and Fuel Management Plan, as described in **Mitigation Measure No. 4**, to RMA-Planning for review and approval. The approved Restoration and Fuel Management Plan shall be incorporated into the approved set of job-site and office-copy construction plans for grading and/or building.

Mitigation Monitoring Action No. 4b. Prior to issuance of construction permits for grading and building, the owner/applicant shall provide evidence to RMA-Planning documenting removal of invasive plant species for review and approval.

Mitigation Monitoring Action No. 4c. Prior to final of construction permits for grading and building, the owner/applicant shall submit documentation that implementation of the Restoration and Fuel Management Plan has been successful to RMA-Planning for review and approval.

5. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5? (Reference: 1, 6 & 8)	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? (Reference: 1, 2, 3, 4, & 10)	☐	☐	☒	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Reference: 1, 6, 10, & 14)	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries? (Reference: 1, 6, & 10)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
Section 3.11 of the Big Sur Land Use Plan states that the Big Sur coastal area is considered to be one of the most significant archaeological regions in California. Therefore, Key Policy 3.11.1 requires the protection and maintenance of Big Sur's archaeological resources. Monterey County Geographic Information System (Reference 6) indicates that the Morgenrath property is located within an area of moderate archaeological sensitivity. In accordance with Section 20.145.120.B.1.b of the Big Sur Coastal Implementation Plan, an archaeological survey report is required for developments within low and moderate archaeological sensitivity zones when such development is subject to environmental review per the CEQA Guidelines. Consistent with this regulation, a Preliminary Archaeological Assessment was prepared and submitted for the Project (Breschini, Reference 10). Assessment of the site included the review of prior background research at the Northwest Information Center of the California Historical Resources Information System at Sonoma State University and an onsite physical inspection of the site.

5(a), (c), and (d). Conclusion: No Impact.
Based on County permit records, GIS data (Reference 6), and staff's site visit (Reference 8), the Morgenrath property does not contain a historical resource (structure or setting) or an informal cemetery. Neither the archaeological assessment (Breschini, Reference 10) or the Geological report (Linden, Reference 14) indicates that the Morgenrath property has the potential to contain unique paleontological resources or geologic features. Therefore, implementation of the Project would have no impact to historic resources, human remains interred outside of formal cemeteries, or unique paleontological resources or geological features.

5(b). Conclusion: Less Than Significant Impact.
Based on background research and site reconnaissance conducted by the project archaeologist, the archaeological assessment (Breschini, Reference 10) concludes that there is no evidence of potentially significant archaeological resources within the portions of the Morgenrath property examined. However, due to Big Sur's rich archaeological history and the site's moderate

archaeological sensitivity, there is potential to accidently uncover unidentified cultural resources or human remains during earth disturbance activities. Therefore, a standard condition of approval requiring work be halted if cultural resources or human remains are found and evaluation of the find by a qualified professional archaeologist has been incorporated with the Project. Implementation of this condition would reduce the Project's potential impact to archaeological resources to a less than significant level.

6. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Reference: 1, 6, 12 & 14) Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking? (Reference: 1, 12 & 14)	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction? (Reference: 1, 12 & 14)	☐	☐	☐	☒
iv) Landslides? (Reference: 1 & 14)	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil? (Reference: 1 & 14)	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (Reference: 1, 12 & 14)	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Chapter 18A of the 2007 California Building Code, creating substantial risks to life or property? (Reference: 1 & 12)	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (Reference: 1 & 13)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

The Monterey County Geographic Information System (GIS, Reference 6) does not contain data for seismic hazards and shows the potential for liquefaction risk to be low. However, it does indicate that the Morgenrath property contains both low and high landslide risk, moderate and high erosion potential, and is located within 660 feet of an active or potentially active fault (**Figure 17**). In accordance with General Policies 3.7.2 and Specific Policies for geologic hazards in 3.7.3.A of the Big Sur Land Use Plan (BSC LUP) and Section 20.145.080.A.1.b of the Big Sur Coastal Implementation Plan (CIP), submittal of a geologic and geotechnical report was required as part of the Project application to ensure proposed development is sited and designed to minimize risk from geologic hazards to an acceptable level.

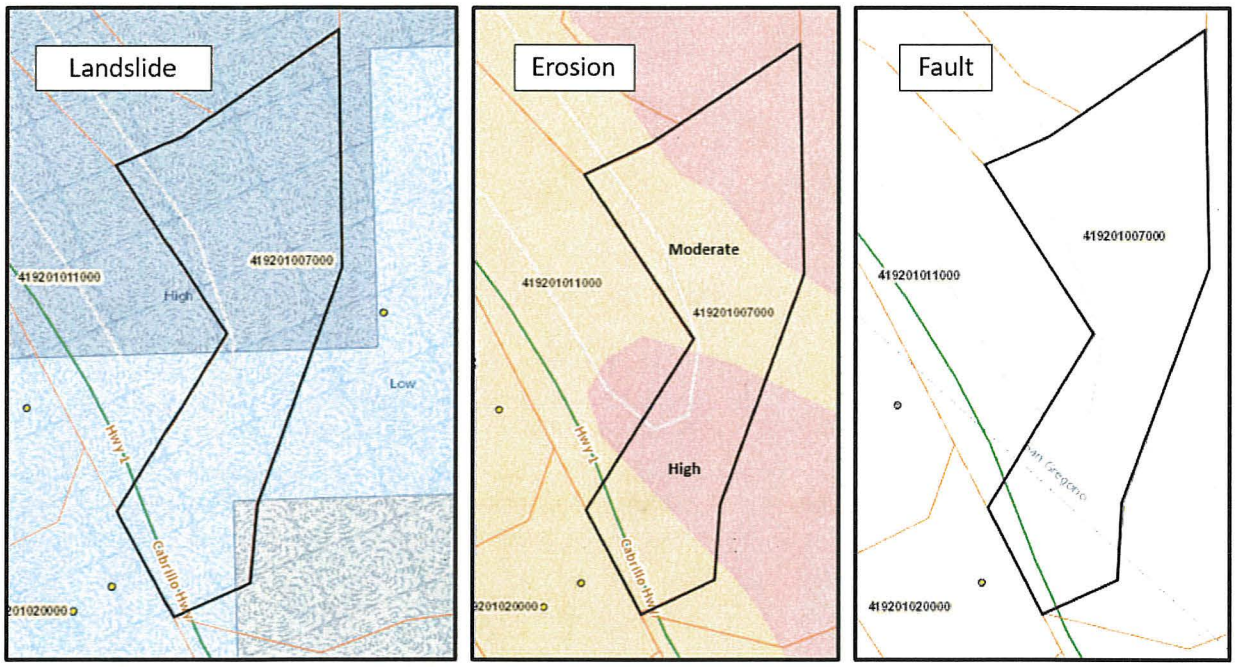


Figure 17. Geological Hazards

Consistent with these requirements, the application for the Project included a Geologic Report (Vonder Linden, Reference 14) and Geotechnical Report (Grice, Reference 12). Together, they analyzed the geological suitability of the site and evaluated its geotechnical properties. The Project includes installation of a septic facility to dispose of wastewater. In order to determine if the proposed area and soils can support the system, the applicant submitted Percolation Testing Results (Odello, Reference 13) with the Project application.

6(a.i), (a.iv), (d), and (e). Conclusion: No Impact.
The Project would not expose people or structures to potential substantial adverse effects caused by fault rupture, landslides, liquefaction, or expansive soils. Inspection of the site and bore logs (Grice, Reference 12) demonstrate that the soil column on the site is made up of clasts (mineral and rock fragments) that range from fine sand to medium gravel and the gradation (mechanical analysis of the soil) varies but contain very little silts and clays. Overall, soils on the site were found to be "generally consistent". This soil profile is typical of the area.

As illustrated in **Figure 17** above, GIS shows that the nearest fault is the San Gregorio Fault which bisects the southern portion of the Morgenrath property. However, the Geologic Report (Vonder Linden, Reference 14) provides a map showing the fault just outside of the property, along and across State Route 1 (SR1) and passes through the River Inn property. The Geotechnical Report (Grice, Reference 12) specifies that the fault is approximately 300 feet southwest of the Morgenrath property. Both reports identify the fault as Late Quaternary (movement between the last 0.5 to 1 million years ago) but found no evidence indicating a fault rupture has occurred at the site. Furthermore, Grice classifies the underlain soils on the site as "relatively strong soils" and found bedrock at a moderate depth. Based on this information, the reports conclude that surface rupture from fault activity or lateral spreading is considered improbable.

Although GIS data shows that the southern portion of the property has a low landslide risk and the northern portion a high landslide risk, both Vonder Linden and Grice found that the area is generally not susceptible to slope failure due to landslides. In 1993, Vonder Linden found no evidence of a landslide affecting the Morgenrath property or vicinity and Grice's 2017 findings concur, indicating that no evidence of landslides were found above or below the building area.

As discussed above, the soils on the site are clastic and contain very little silts or clays. Grice concludes that this type of soil makeup is considered not to be susceptible to liquefaction or considered expansive soils.

The Morgenrath site contains soils that would adequately support an onsite wastewater treatment system (septic system). The Project includes an office that would have a single restroom. Therefore, treatment of wastewater would require the installation of a septic system. Soils on the site were tested and observed to ensure septic feasibility. The Percolation Testing Results (Odello, Reference 13) demonstrate that 4 test borings were drilled in the approximate location of the proposed leach fields and ranged in depth from 6.5 feet to 13.35 feet below the existing grade. A 5th test boring was drilled to a depth of 20 feet for the purpose to serve as a groundwater monitor boring. The boreholes were saturated and after a 24-hour period, clear water was placed within the percolation zone of each test borehole. Water levels were measured and the test was repeated every half hour. During testing, no groundwater was observed in monitoring hole 5. Odello concludes that the percolation testing rates were found to be within acceptable levels, consistent with County requirements. During review of the project, the Environmental Health Bureau has reviewed the project and Percolation Testing Results and did not recommend any conditions of approval to ensure compliance with County regulations.

6 (a.ii), (b), and (c). Conclusion: Less Than Significant Impact.
Monterey County is recognized to contain a number of faults, two of which are found in the Big Sur segment: San Gregorio-Palo Colorado and the Sur-Nacimiento Faults. Therefore, the Morgenrath site would have the potential to experience seismic ground shaking and since the Project involves the establishment of new structures, would potentially expose people or structures to strong seismic ground shaking. The Geotechnical Report (Grice, Reference 12) has analyzed these potential seismicity hazards and recommends that the structures be designed and built in accordance with the requirements of the California Building Code.

Although the Morgenrath property would not be susceptible to landslides, lateral spreading, or liquefaction, Grice notes that existing fill placed on the building pads for the office and shop are not considered engineered and would not be suitable for supporting the structures. Therefore, it is recommended that in areas that would support foundations, loose or unsuitable soils shall be processed as engineered fill.

As shown in **Figure 17** above, the Morgenrath property contains areas with moderate and high erosion potential. RMA-Environmental Services reviewed the Project and the Geotechnical Report. To ensure the proposed improvements are constructed in accordance with the requirements of the California Building Code and the recommendations contained in the Geotechnical Report, RMA-Environmental Services has incorporated a condition of approval requiring the applicant to provide documentation from a licensed practitioner certifying that all development has been constructed in accordance with the Geotechnical Report. In order to ensure erosion of soils are addressed in conformance with the requirements of Chapter 16.12 of the Monterey County Code, RMA-Environmental Services has incorporated a condition of approval requiring the applicant to submit an erosion control plan, for review and approval, prior to issuance of construction permits. The Project as proposed, and conditioned, would have a less than significant impact resulting from geology and soils hazards.

7. 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? (Reference: 1 & 7)	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Reference: 1 & 7)	☐	☐	☒	☐

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 *22012-2015 Air Quality Management Plan for the*

Monterey Bay Region (AQMP) (Reference 20) which evaluates a project's potential for a cumulative adverse impact on regional air quality (ozone levels).

7(a) and (b). Conclusion: Less Than Significant Impact.
The Project includes the relocation of an existing operation from the former Blaze site to the Morgenrath property. From a GHG emission standpoint, this would result in no change the baseline of the surrounding area. Temporary construction activities of the proposed Project would be the main contributor to GHG emissions. Unfortunately, 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 construction and grading 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.

8. HAZARDS AND HAZARDOUS MATERIALS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Reference: 1, 6 & 8)	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Reference: 1, 6 & 8)	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Reference: 1, 6 & 8)	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Reference: 1)	☐	☐	☐	☒

8. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? (Reference: 1, 6 & 8)	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? (Reference: 1, 6 & 8)	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Reference: 1, 19)	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (Reference: 1)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
The Project is for the relocation of an existing operation from the former Blaze site to the Morgenrath property. This existing operation included, and would continue to include, handing and storing of oil for use in vehicles, waste oil from their vehicles, oxygen and acetylene tanks, liquid petroleum gas, and diesel fuel for their construction vehicles. The Project's General Development Plan (GDP) (Reference 1) states that waste oil would be picked up and recycled by a licensed hauler as needed and has an existing up to date Business Response Plan.

8(c), (d), (e), (f), and (g). Conclusion: No Impact.
Although the Project includes the handling and storage of hazardous materials, the Monterey County Geographic Information System (Reference 6) and Google Earth Imagery (Reference 16) confirms that the Morgenrath property is not located within one-quarter mile of a school. Captain Cooper Elementary School and Apple Pie Pre-School is located approximately 0.41 miles from the closest edge of the Morgenrath property and the distance between the school's driveway and the Project's proposed driveway is just over three-quarters of a mile. Because the main point of access to the school is a winding driveway approximately one-half mile in length and located east of SR1, Blaze's vehicles transporting hazardous materials is unlikely to occur with one-quarter mile; with the exception if Blaze were to be hired to provide maintenance or emergency contract work for the school.

The Environmental Health Bureau (EHB) has reviewed the proposed project. Part of EHB's review includes determining whether or not the Morgenrath property is included on the California Department of Toxic Substances Control's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). There are 3 active sites/facilities within Monterey County, none of

which are on the Morgenrath property or within its vicinity. Therefore, the Project would not have the potential to create a significant hazard to the public or the environment relative to Government Code Section 65962.5.

Data contained in the Monterey County Geographic Information System (Reference 6) and as observed during staff's site visit (Reference 8) confirms that the Morgenrath property is not within an area subject to an airport land use plan, within 2 miles of an airport, or within the vicinity of a private airstrip. Therefore, the Project would not result in an airport or over-flight safety hazard for people residing or working in the project area.

The Project includes the relocation of an existing operation to an adjacent property, establishment of structures on a vacant property, and the creation of a new driveway access. These changes would not interfere with the implementation of the Multi-Jurisdictional Hazard Mitigation Plan adopted for the County of Monterey.

8(a), (b), and (h). Conclusion: Less Than Significant Impact.
As discussed above, the Project would include handling and storing of hazardous materials. Review of the Project by EHB and information contained in the Project's GDP (Reference 1) shows that Blaze Engineering is currently permitted by the bureau as a Hazardous Waste Generator for their above ground fuel storage tank (Facility ID No. FA0813374). In order to ensure this Permit is updated, EHB will be incorporating a Condition of Approval requiring the applicant to provide EHB's Hazardous Materials Management Services with an update on: the operation's address and site location, hazardous materials/waste inventory list, and California Environmental Reporting System registration. Implementation of this condition would ensure the operational component of the Project would be consistent with the requirements set forth in Monterey County Code Chapters 10.65 (Hazardous Materials Registration) and 10.67 (Hazardous Materials Emergency Response) and would reduce impacts relative to the transportation, disposal, or emittance of hazardous materials to a less than significant impact.

Data contained in the Monterey County Geographic Information System (Reference 6) indicates that the Morgenrath property, and much of the surrounding area, is designated as a "Very High" State Responsibility Fire Hazard Zone. The Project plans (Reference 1) includes a Landscape and Fuel Management Plan (**Figure 18**).

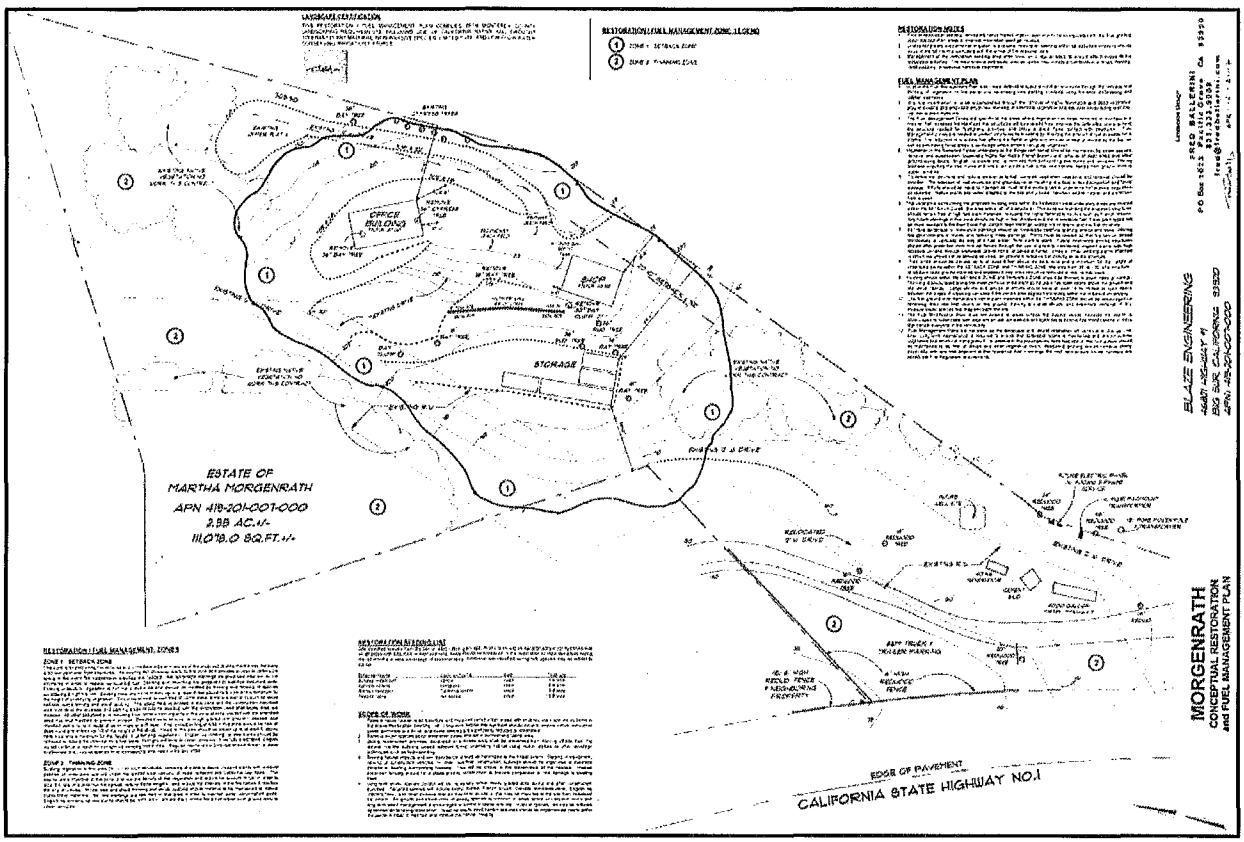


Figure 18. Landscape and Fuel Management Plan

Implementation of this plan is intended to create a defensible space around all structures (area indicated as "ZONE 1: SETBACK ZONE") and thinning of vegetation and restoration using fire-wise landscaping (area indicated as "ZONE 2: THINNING ZONE"). Fuel modification and management of vegetation would increase the likelihood that the proposed structures survive wildfires. The Project has been reviewed by Carmel Fire Protection Associates, who performs fire review of permits located in un-districted areas of Monterey County, and no conditions were applied. However, it was noted that all development would be subject to the Monterey County Fire Code. Implementation of the Landscape and Fuel Management Plan and Carmel Fire Protection Associates' review of the plans for construction would reduce the Project's risk of loss, injury, or death relative to wildland fires to less than significant.

9. HYDROLOGY AND WATER QUALITY **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements? (Reference: 1)	☐	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? (Reference: 1)	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? (Reference: 1, 6, 8 & 12)	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Reference: 1, 6 & 8)	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (Reference: 1 & 8)	☐	☐	☒	☐
f) Otherwise substantially degrade water quality? (Reference: 1)	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (Reference: 1 & 6)	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? (Reference: 1 & 6)	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? (Reference: 1 & 6)	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow? (Reference: 1, 6, 8 & 12)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
The Morgenrath property is a vacant parcel and the proposed site improvements would result in the conversion of pervious surfaces into impervious surfaces and converting a test well (see Planning File No. PLN170051) into a permanent well to provide potable water to the site. The project has been reviewed by the Water Resources Agency and RMA-Environmental Services for project consistency with Monterey County regulations for development within the floodplain, grading activities, and erosion control.

9(a), (b), (f), (g), (h), (i), and (j). Conclusion: No Impact.
Other than what is discussed below, the Project would not have the potential to result in substantial degradation of water quality. The Monterey County Geographic Information System (Reference 6) and review by the Water Resources Agency demonstrates that the subject Property is not located within a 100-year flood hazard area or identified to be down-stream from a levee or dam. Therefore, the Project would not result in placing structures within a flood hazard area or impede or redirect flood flows, resulting in no impact. The Morgenrath property is located approximately 2 miles from the coast and is at 180 feet above mean sea level at its lowest point. In addition, there are no lakes within the vicinity of the site. Therefore, the Project would have no impact caused by tsunami or seiche. As discussed in Section VI.6 – Geology and Soils, of this Initial Study, the underlying soils of the Morgenrath property are relatively strong and the site has a low potential to be subjected to landslides. In relation, there would be less than significant impacts caused by mudflow.

9(c), (d), and (e). Conclusion: Less Than Significant Impact.
Implementation of the Project would result in over 2,000 square feet of new structural coverage and driveway improvements that would require compaction of soils. These improvements would have the potential to incrementally reduce groundwater recharge, alter the existing site drainage patterns, and contribute to existing runoff in the area. Adoption of County grading and erosion control regulations were intended to protect and promote health, safety, and the public welfare by minimizing conditions of accelerated erosion and protecting the natural environment. Section 15183(g) of the CEQA Guidelines considers these regulations as uniformly applied development standards and their application to projects can be applied as conditions of approval without the need for further mitigation.

In order to address these potential issues, the Project's includes preliminary plans for civil improvements consisting a grading, drainage, and an erosion control plan (Reference 1). These plans have been reviewed by the Water Resources Agency and RMA-Environmental Services and recommended standard conditions of approval requiring submittal of a final grading plan and erosion control plan have been incorporated to ensure final construction would meet County requirements. Therefore, implementation of the project, as proposed and conditioned, would have a less than significant impact to hydrology and water quality.

10. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community? (Reference: 1, 3 & 8)	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (Reference: 1, 3 & 8)	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
See previous Section II.B (Project Description) and C (Environmental Setting) and Section IV.A (Environmental Factor Potentially Affected), as well as the References listed.

11. MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (Reference: 1, 3, 6 & 8)	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (Reference: 1, 3, 6 & 8)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
See previous Section II.B (Project Description) and C (Environmental Setting) and Section IV.A (Environmental Factor Potentially Affected), as well as the References listed.

12. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Reference: 1, 2, 3, 6 & 8)	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? (Reference: 1, 2, 3, 6 & 8)	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (Reference: 1, 2, 3, 6 & 8)	☐	☐	☐	☒
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (Reference: 1, 2, 3, 6 & 8)	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (Reference: 1, 2, 3, 6 & 8)	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (Reference: 1, 2, 3, 6 & 8)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
The Morgenrath property is located in an area with visitor serving commercial properties to the south and residential properties to the north. The primary noise contributor is produced by vehicular traffic on SR1. Secondary noise contributors are produced by entertainment activities associated with the visitor/commercial uses and the Blaze Engineering operations that occurred on the adjacent property (Assessor's Parcel Number 419-201-006-000) where there are sensitive noise receptors are established. Because the baseline noise conditions include the spatial and functional conditions of the area at the time the application for the Project was made, the operational components of the project would result in no change to existing noise levels in the area. However, there would be temporary noise impacts during construction.

12(c), (e), and (f). Conclusion: No Impact.
The Project includes the relocation of an existing operation from the former Blaze site to the Morgenrath property. This change would result in relocating the main noise producers of the operations, large vehicles and the cement silo, further away from existing single family dwellings and move them closer to SR1. In addition, the hours of operation stated in the General Development Plan (Reference 1) would be Monday through Friday from 8:00am to 4:30pm.

Therefore, implementation would not expose people to noise levels that exceed Monterey County standards and would not substantially, and permanently, increase ambient noise levels. Data contained in the Monterey County Geographic Information System (Reference 6) and as observed during staff's site visit (Reference 8) confirms that the Morgenrath property is not within an area subject to an airport land use plan, within 2 miles of an airport, or within the vicinity of a private airstrip. Therefore, the Project would not expose people residing or working in the area excessive noise levels associated with airports.

12(a), (b), and (d). Conclusion: Less Than Significant Impact.
Construction activities would produce noise not typically found in the area. In addition, grading would have the potential to create groundborne vibrations. Since these impacts would be temporary, grading activities would be minimal at any given time, and the construction is at a distance from sensitive receptors, potential impacts are not considered significant. Furthermore, Monterey County Code Chapter 10.60 establishes regulations for noise requirements and compliance with these regulations would ensure any noise impacts be reduced to a less than significant level.

13. POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
See previous Section II.B (Project Description) and C (Environmental Setting) and Section IV.A (Environmental Factor Potentially Affected), as well as the References listed.

14. PUBLIC SERVICES Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒
b) Police protection? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒
c) Schools? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒
d) Parks? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒
e) Other public facilities? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
See previous Section II.B (Project Description) and C (Environmental Setting) and Section IV.A (Environmental Factor Potentially Affected), as well as the References listed.

15. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (Reference: 1, 2, 3 & 4)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
See previous Section II.B (Project Description) and C (Environmental Setting) and Section IV.A (Environmental Factor Potentially Affected), as well as the References listed.

16. TRANSPORTATION/TRAFFIC **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (Reference: 1, 3, 4 & 8)	☐	☐	☐	☒
b) Conflict with the goals, objectives, and policies of the 2010 Regional Transportation Plan for Monterey County, including, but not limited to level of service standards and travel demand measures, or other standards established by the Transportation Agency for Monterey County (TAMC) for designated roads or highways? (Reference: 1, 3, 4 & 8)	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks? (Reference: 1, 3, 4 & 8)	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Reference: 1, 8 & 18)	☐	☐	☒	☐
e) Result in inadequate emergency access? (Reference: 1, 3, 4 & 8)	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? (Reference: 1, 3, 4 & 8)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

The Project is for the relocation of an existing operation from the former Blaze site to the Morgenrath property. This existing operation provided, and would continue to provide, construction contractor related services to the community and visitors. The Project's General Development Plan (GDP) (Reference 1) lists examples of merchandise provided by Blaze such as concrete, rock, sand, and plumbing and landscape supplies and examples of services consist of grading, paving, installing water, septic, and electrical systems, and road building and repair. Blaze also provides heavy equiptment, fuel, and labor to the Big Sur area on an emergancy basis. For example, assistance to repair and re-open damanged road was provided during the 1998 El Nino, 2008 Basin Complex Fire, 2013 Pfeiffer Ridge Fire, 2016 Soberanes Fire, and 2017 landslide events. The ongoing component of the Project would provide a home base for Blaze's operation with office hours Monday through Friday from 8:00am to 4:30pm. However, on-call

staff is available for emergency response. Associated activities on the site will be primarily for administrative, storage, and maintenance. Based on the goods and services Blaze provides, intensive construction activities would continue to occur off-site on their clients' property. Blaze currently has 20 employees, including office staff, and parking for administrative staff is proposed in an area located adjacent to the office and shop (GDP, Reference 1 and **Figure 1**).

16(a), (b), (c), (e), and (f). Conclusion: No Impact.
Because the Project includes relocating an existing operation from one property to another, the volume of traffic would not exceed the baseline condition nor impact the existing level of service in the area. Specific Policy 4.1.3.A.4 of the Big Sur Land Use Plan requires limiting of access road entrances off SR1 unless it can be demonstrated that the use of existing public or private roads is not feasible. Section 20.145.130.B.6 of the Big Sur Coastal Implementation Plan requires proposed developments that include the construction of a new entrance to SR1 to demonstrate an inability to use existing public roads to access SR1. Consistency with this policy and implementation of the regulation is intended to further the County's objective to maintain and enhance SR1's aesthetic beauty and to protect its primary function as a "recreational route". As shown in **Figure 19** below, access to the Morgenrath property is provided by an existing driveway off SR. However, approximately 60-feet north of the existing driveway, the applicant proposes to construct a new driveway access with safer ingress and egress due to a greater line of sight distance. Parking of Blaze's large construction equiptment (trucks, trailers, dozers, ect.) is proposed within the existing flat dirt parking area adjacent to the new driveway (**Figure 7**).

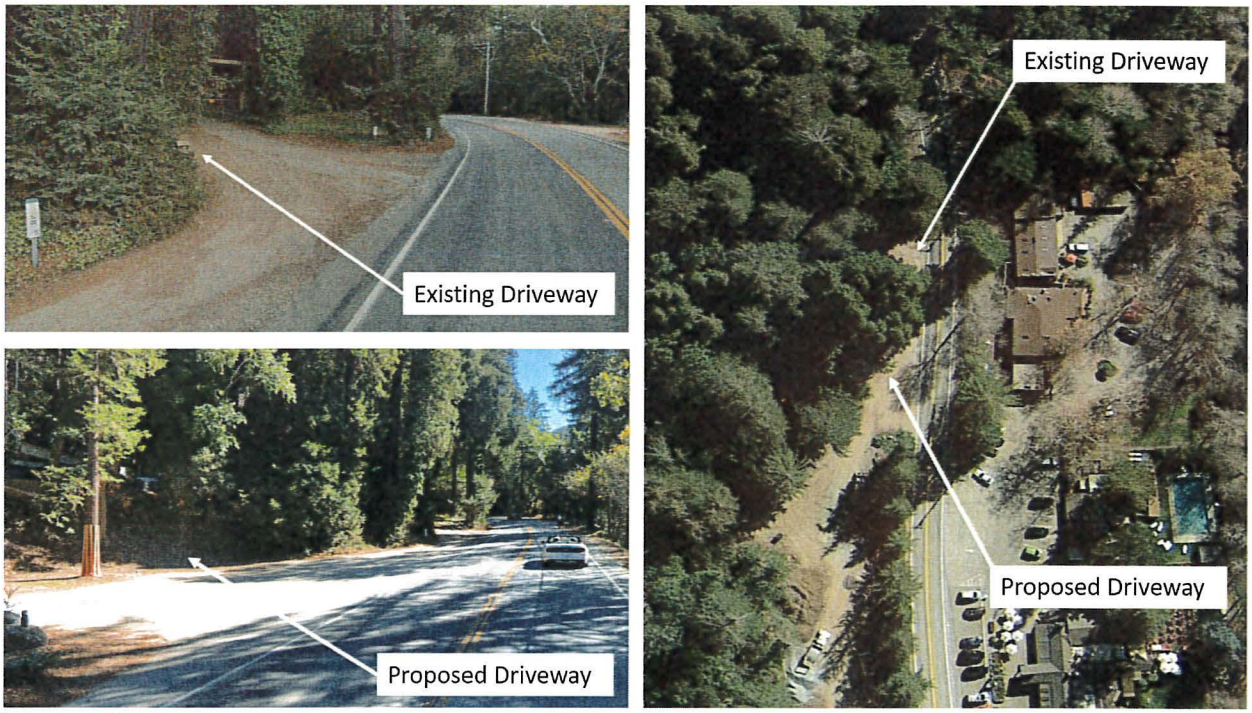


Figure 19. Driveway Entrance

The Project was determined to be consistent with the policy and regulation discussed above because the new driveway entrance is located in an existing wider apron and is approximately 100 feet further from the curvature of the highway. This provides a greater line-of-sight distance resulting in safer turning movements on and off of SR1. In addition, the larger construction

vehicles are proposed to be parked in the lower flat area off SR1, also allowing for safer egress. Furthermore, the Project does not include uses that would require air transport on or off the Morgenrath property. Therefore, the Project would be consistent with the goals and policies of the BSC LUP for circulation, roadway level of service, air traffic patterns, emergency access or alternative modes of transportation and result in no impact.

16(d). Conclusion: Less Than Significant Impact.

The Project includes utilizing an existing road right of way that terminates on an adjacent property (Assessor's Parcel Number 419-201-010-000), Apple Pie Ridge Road (**Figure 20**). During the Big Sur Land Use Advisory Committee Meeting (Reference 18), a member of the public identified potential hazards resulting from the vehicular-pedestrian interface. Although the right of way is existing, and use of the road is consistent with its purpose, the Project would result in a slight increase of vehicular traffic. The primary concern from the public is that school children walk on the road to get to and from school. To address these concerns of the neighbors, the applicant has agreed to modify their plans to either create an informal walking path along the roadway and/or incorporate fencing to act as a barrier. Because the preliminary plans do not include these improvements, a non-standard condition of approval has been incorporated to ensure the final construction plans reflect the change.

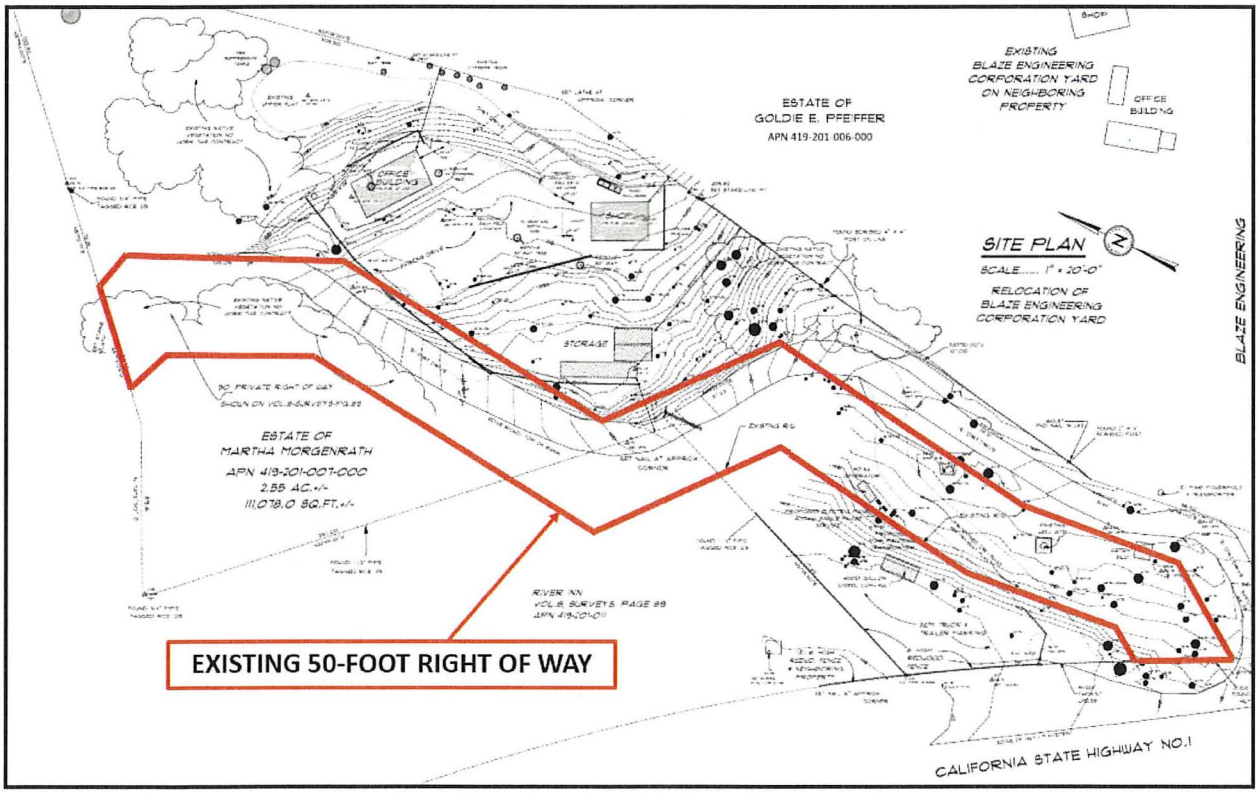


Figure 20. Portion of Apple Pie Ridge Road

17. 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 (Reference: 1, 2, 3, 4 & 6)	☐	☐	☐	☒
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. (Reference: 1, 3, 4, 6, 10 & 15)	☐	☒	☐	☐

Discussion/Conclusion/Mitigation:
As discussed in Section VI.5 – Cultural Resources of this Initial Study, Monterey County Geographic Information System (GIS) (Reference 6) indicates that the Morgenrath property is located within an area of moderate archaeological sensitivity and in accordance with Section 20.145.120.B.1.b of the Big Sur Coastal Implementation Plan, an archaeological survey report, Preliminary Archaeological Assessment, was prepared and submitted for the Project (Breschini, Reference 10). The Project includes excavation of undisturbed earth, and although the referenced section found impacts to cultural resources less than significant, the Project would have the potential to impact tribal cultural resources.

17(a.i). Conclusion: No Impact.
Data contained in GIS (Reference 6) does not identify the Morgenrath property to contain a historical site. In fact, the closest site to the property would be Molera Ranch, which is over 2 miles to the northwest. Therefore, the proposed development would result in no impact to a historical resource.

17(a.ii). Conclusion: Less Than Significant Impact With Mitigation Incorporated.
In accordance with Section 21080.3.1 of the Public Resources Code (often referred to as Assembly Bill 52 – Native Americans: California Environmental Quality Act) non-exempt projects subject to environmental review shall request a Tribal Consultation to determine if potential impacts to tribal cultural resources exist. On June 19, 2018, RMA-Planning staff consulted with the OCEN tribe. As documented in the OCEN formal response letter, dated June

18, 2018, RMA-Planning staff was notified that the primary priority of OCEN is to protect their ancestor's remains through avoiding disturbance and that the site be preserved and/or all cultural and sacred items be left with their ancestors onsite or where they were discovered. Through continuous discussions with Tribal representatives and background information contained in the archaeological report, locations such as the coast and/or areas containing, or used to contain, a water source, have been known to provide occupation, gathering, and processing sites for Native Americans. The Big Sur River is approximately 500-feet west of the site and Pheneger Creek, a tributary to the Big Sur River, is approximately 150-feet to the south. Because of this knowledge, the OCEN tribe considers the Morgenrath property to potentially contain cultural tribal resources. Therefore, the following mitigation measure, as recommended by OCEN, has been incorporated to reduce potential impacts to tribal cultural resources to a less than significant level.

Mitigation Measure No. 6. Protection of Cultural Resources and Sacred Places.
In order to reduce potential impacts to cultural resources and sacred places, excavation for the new driveway, as shown on the preliminary Grading and Drainage Plan Driveway Plan and Profile (Sheet No. C-3) and excavation for the septic tank, as shown on the preliminary Site Plan (Sheet No. A1.1), shall be observed by a Native American Tribal Monitor for the Ohlone/Costanoan-Esselen Nation (OCEN), as approved by the OCEN Tribal Council. This monitoring shall be limited to the areas specified above and to excavation of sterile soils. Placement of fill and/or compaction of soils shall not require a tribal monitor. If more than one earth moving equipment is deployed at different locations at the same time, more than one tribal monitor shall be present during those periods. If at any time, potentially significant cultural resources, sacred places, or intact features are discovered, the contractor shall temporarily halt work until the find can be evaluated by the tribal monitor and archaeological monitor. If the find is determined to be significant, work shall remain halted until mitigation measures have been formulated, with the concurrence of RMA-Planning, and implemented. Since any items that may be uncovered during excavation belong to the property owner, this mitigation shall serve as notice that the OCEN Tribal Council formally requests that any sacred burial items discovered be given to the tribe by the property owner.

> **Mitigation Monitoring Action No. 5a:** Prior to issuance of construction permits for grading or building, the owner/applicant shall include a note on the construction plans encompassing the language contained in **Mitigation Measure No. 5**. The owner/applicant shall submit said plans to RMA-Planning for review and approval.
>
> **Mitigation Monitoring Action No. 5b:** Prior to issuance of construction permits for grading or building, the owner/applicant shall submit a contract with an OCEN approved Native American Tribal Monitor to RMA-Planning for review and approval. The contract shall outline logistics for monitoring during earth disturbance activities specified in **Mitigation Measure No. 5** as well as how uncovered cultural resources will be handled, in coordination with the project archaeologist.
>
> **Mitigation Monitoring Action No. 5c:** An on-site preconstruction meeting shall be held between the applicant, OCEN Tribal monitor, and contractor to discuss and assure understanding of **Mitigation Measure No. 5** and scheduling of construction with regard to monitoring. Prior to issuance of any construction permits for grading or construction,

the preconstruction meeting between the parties shall be conducted and a letter summarizing what was discussed shall be submitted to RMA-Planning.

Mitigation Monitoring Action No. 5d: During earth disturbance activities specified in **Mitigation Measure No. 5**, the OCEN approved Native American Tribal Monitor shall be onsite observing the work, consistent with the approved contract required by **Mitigation Measure Action No. 5b**. Prior to final of construction permits for grading or building, the owner/applicant shall submit a letter for the Native American Tribal Monitor verifying all work was done consistent with the contract to RMA-Planning.

18. UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (Reference: 1)	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Reference: 1)	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Reference: 1 &12)	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (Reference: 1)	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Reference: 1)	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (Reference: 1)	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste? (Reference: 1)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
See previous Section II.B (Project Description) and C (Environmental Setting) and Section IV.A (Environmental Factor Potentially Affected), as well as the References listed.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Reference: 1, 2, 3, 4, 5, 6, 7,8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 & 19)	☐	☒	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? (Reference: 1, 2, 3, 4, 5, 6, 7,8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 & 19) ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? (Reference: 1, 2, 3, 4, 5, 6, 7,8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 & 19)	☐	☐	☐	☒
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (Reference: 1, 2, 3, 4, 5, 6, 7,8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 & 19)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Pursuant to Section 21083 of the Public Resources Code and Section 15065 of the CEQA Guidelines, a project would be considered to have a significant effect on the environment, and an Environmental Impact Report shall be prepared, if impacts identified cannot be avoided or mitigated to a point where no significant effect on the environment would occur. Analysis provided in this Initial Study found that there is no substantial evidence, in light of the whole record, that the Project may have a significant effect on the environment.

(a). Conclusion: Less Than Significant Impact with Mitigation.

Based upon the analysis conducted for this Initial Study, the Project would have no impacts to agriculture and forest resources (see Section IV.A) and potential impacts to cultural resources (see Section VI.5). A standard condition of approval requiring work to be halted if cultural

resources are accidently uncovered during excavation has been incorporated within the project and would reduce the impact to a less than significant level. The Project would have a potential to impact a special natural community that is considered to be an environmentally sensitive habitat area (see Section VI.4 – Biological Resources). Mitigation Measures Nos. 1 through 4 have been incorporated requiring biological monitoring, tree protection, and approval of a final Construction Management Plan and Restoration and Fuel Management Plan. Implementation of these mitigations would reduce potential impacts to biological resources to a less than significant level. The Project would have the potential to impact tribal cultural resources (see Section VI.17). Mitigation Measure No. 6 has been incorporated requiring an approved tribal monitor to observe excavation for a portion of the driveway and septic tank. Implementation of this mitigation would reduce potential impacts to tribal cultural resources to a less than significant level.

(b). Conclusion: No Impact.
The Project includes the relocation of an existing operation from the former Blaze site to the Morgenrath property and would result in a temporary change due to construction activities. However, there would be no change in baseline relative to the spatial and functional conditions of the surrounding area at the time the application for the Project was made. Therefore, establishment of the use and the ongoing operational impacts of the Project would not be cumulatively considerable. Furthermore, the identified temporary construction impacts cause by implementation of the Project have been found to be less than significant.

(c). Conclusion: Less than Significant Impact.
Based upon the analysis conducted for this Initial Study, the Project would have no impacts to land use and planning, mineral resources, population and housing, public services, recreation, and utility and service systems (see Section IV.A). The Project would have potential impacts to aesthetics (see Section VI.1), air quality (see Section VI.3), geology and soils (see Section VI.6), greenhouse gas emissions (see Section VI.7), hazards and hazardous materials (see Section VI.8), hydrology and water quality (see Section VI.9), and noise (see Section VI.12). Standard conditions of approval have been incorporated which would result in reducing these impacts to a less than significant level. The Project would have a less than significant impact the potential to impact humans by increasing traffic hazards due to increasing the vehicular-pedestrian interface on an existing rural roadway (see Section VI.16). However, this potential impact does not rise to a level that would require mitigation, the applicant has agreed to address concerns from the neighbors by modifying the Project design. A non-standard condition of approval has been incorporated to ensure final plans includes these improvements.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at

1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

VIII. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

The State Legislature, through the enactment of Senate Bill (SB) 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a "de minimis" (minimal) effect on fish and wildlife resources under the jurisdiction of the California Department of Fish and Wildlife. Projects that were determined to have a "de minimis" effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of "de minimis" effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the California Department of Fish and Wildlife determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of "no effect" on fish and wildlife resources, development applicants must submit a form requesting such determination to the California Department of Fish and Wildlife. A No Effect Determination form may be obtained by contacting the Department by telephone at (916) 653-4875 or through the Department's website at www.wildlife.ca.gov.

Conclusion: The project will be required to pay the fee.

Evidence: Based on the record as a whole as embodied in the RMA-Planning files pertaining to PLN160851 and the attached Initial Study / Proposed Mitigated Negative Declaration.

IX. REFERENCES

1. Project Application, Plans, and Proposed General Development Plan
2. 1982 Monterey County General Plan
3. Big Sur Coast Land Use Plan
4. Big Sur Coastal Implementation Plan, Part 3
5. Title 20 of the Monterey County Code (Zoning Ordinance), Part 1 of the Coastal Implementation Plan
6. Monterey County Geographic Information System (GIS)
7. CEQA Air Quality Guidelines, Monterey Bay Unified Air Pollution Control District, Revised February 2008
8. Site Visit conducted by the project planner on February 8, 2018
9. "Tree Resource Evaluation Project Impact Analysis", dated October 6, 2017 (Monterey County Document No. LIB170437), prepared by Maureen Hamb-WCISA, Santa Cruz, CA
10. "Preliminary Archaeological Assessment", dated February 17, 2018 (Monterey County Document No. LIB170438), prepared by Gary S. Breschini, Ph. D., Salinas, CA
11. "Biological Assessment", dated October 23, 2017 (Monterey County Document No. LIB170439), prepared by Fred Ballerini, Pacific Grove, CA
12. "Geotechnical Report", dated February 2017, (Monterey County Document No. LIB170440), prepared by Grice Engineering, Inc., Salinas, CA
13. "Percolation Testing Results", dated November 27, 2017 (Monterey County Document No. LIB170441), prepared by Haro, Kasunich and Associates, Inc., Watsonville, CA
14. "Geologic Report", dated June 22, 1993 (Monterey County Document No. LIB170052), prepared by Karl Vonder Linden, Menlo Park, CA
15. Tribal Consultation Letter received from The Ohlone/Costanoan-Esselen Nation, dated June 18, 2018
16. Google Earth Imagery dated February 4, 2018 36°16'11.56" N 121°48'25.62" W, Elevation at 165ft., Eye Alt. 1445ft.
17. Big Sur Coast Highway Management Plan, Caltrans District 5, March 2004
18. Big Sur Land Use Advisory Committee Minutes for Meeting Dated January 23, 2018
19. "Monterey County Multi-Jurisdictional Hazard Mitigation Plan", dated September 2014, prepared by the Monterey County Hazard Mitigation Planning Team and AECOM
20. The 2012-2015 Air Quality Management Plan (AQMP), including the 1991 AQMP and the 2009-2011 Triennial Plan Revision

MONTEREY COUNTY
HOUSING & COMMUNITY DEVELOPMENT
1441 SCHILLING PL SOUTH 2nd FLOOR, SALINAS, CA 93901
PHONE: (831) 755-5025/FAX: (831) 757-9516

SUPPLEMENTAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

BACKGROUND INFORMATION

Project Title:	Morgenrath Martha J TR ET AL (Blaze Engineering)
File No.:	PLN160851-AMD1
Project Location:	46821 Highway 1, Big Sur
Name of Property Owner:	Morgenrath Martha J TR ET AL
Name of Applicant:	Law Offices of Aengus Jeffers
Assessor's Parcel Number:	419-201-007-000
Acreage of Property:	2.55 Acres
General Plan Designation:	Rural Community Center
Zoning District:	Visitor Serving Commercial, Design Control (Coastal Zone)
Lead Agency:	HCD-Planning
Prepared By:	Fionna Jensen, Senior Planner, Monterey County Housing and Community Development
Date Prepared:	January 15, 2023
Contact Person:	Fionna Jensen, Senior Planner, Monterey County Housing and Community Development
Phone Number:	(831) 796-6407

II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

This Supplemental Initial Study/Mitigated Negative Declaration ("Supplemental IS/MND") has been prepared pursuant to Section 15163 of the California Environmental Quality Act ("CEQA") Guidelines to disclose the involvement of new potentially significant environmental effects which are the result of changes which have occurred in respect to circumstances under which the project is being taken. However, such changes and additions are only minor and are needed to make the previously adopted IS/MND (SCH No. 2018091005) adequately apply to the project in the changed situation. Therefore, as the Lead Agency, the County of Monterey has chosen to prepare a Supplemental IS/MND.

The Proposed Project, as described below in subsection II.A, serves as an amendment to the previously Proposed Project. The Original Project scope consisted of a Combined Development Permit to allow construction of a 760 square foot office, a 600 square foot workshop, 800 square feet of storage containers, and storage of equipment such as generators, raw materials, cement silo, and diesel storage tanks. This Original Project scope included the removal of 16 protected trees, the conversion of a test well into a permanent well, development on slopes, installation of an on-site wastewater treatment system, and approximately 440 cubic yards of cut and 620 cubic yards of fill (referred to as "the Original Project"). In accordance with CEQA Guidelines Section 15064, an Initial Study/Mitigated Negative Declaration ("IS/MND") (SCH No. 2018091005) was prepared to analyze the potential environmental impacts of this Original Project scope and was circulated from September 5, 2018, to October 5, 2018. The Monterey County Board of Supervisors adopted the IS/MND in May 2019 (referred to as the "2019 IS/MND") (Source: IX.13). The 2019 IS/MND found that project implementation would result in no impacts to agricultural and State forest resources, land use/planning, population and housing, mineral resources, public services, recreation, or utilities and service systems, and less than significant impacts to aesthetics, air quality, cultural resources, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use/planning, noise, and transportation and traffic. The 2019 IS/MND disclosed that the project would have potential impacts to biological resources and tribal cultural resources caused by site disturbance and the establishment of new structures. Mitigation measures were recommended and adopted to reduce impacts to a less than significant level. Therefore, the Original Project scope was found to have a less than significant impact on the environment (Source: IX.13)

The 2019 IS/MND (SCH No. 2018091005) found that the Original Project scope would have a potential to impact a special natural community that is considered to be an environmentally sensitive habitat area. Mitigation Measures Nos. 1 through 4 were incorporated requiring biological monitoring, tree protection, and approval of a final Construction Management Plan and Restoration and Fuel Management Plan. Implementation of these mitigations would reduce potential impacts to biological resources to a less than significant level. Additionally, the original project was found to have the potential to impact tribal cultural resources. Mitigation Measure No. 5 was incorporated requiring an approved tribal monitor to observe excavation for a portion of the driveway and septic tank. Implementation of this mitigation would reduce potential impacts to tribal cultural resources to a less than significant level. The four biological mitigation measures and one tribal cultural mitigation measure are still feasible and adequate for the Proposed Project. However, minor clarification and amplification changes to the mitigation

measures are needed. The 2019 IS/MND is on file in the offices of Monterey County HCD-Planning, located at 1441 Schilling Place, 2nd Floor, Salinas, California, 93901 (Source: IX.13).

A. Description of Project:

The Morgenrath (Blaze Engineering) Original Project included the establishment of a commercial business operation for Blaze Engineering on a vacant parcel zoned Visitor Serving Commercial, Design Approval, Coastal Zone or "VSC-D(CZ)". The original project's facilities included construction of a 760 square foot office, a 600 square foot workshop, and 800 square feet of shipping containers to be used for storage purposes. Associated equipment such as generators, a cement silo, and above ground diesel storage tanks were to be stored onsite. An onsite wastewater treatment system was also proposed to provide wastewater service and potable water would be provided by a test well converted into a permanent well. Site improvements required the removal of 16 protected trees, grading of 444 cubic yards of cut and 619 cubic yards of fill, and development on slopes in excess of 30%. The applicant, hereafter referred to as "Morgenrath" or "Blaze Engineering," requested a Combined Development Permit to erect these facilities and commence use (Source: IX.1). On May 21, 2019, the Monterey County Board of Supervisors approved the Combined Development Permit (HCD Planning File No. PLN160851-AMD1).

To address minor changes in the Original Project's description, Blaze Engineering requests an Amendment to the previously approved Combined Development Permit (HCD Planning File No. PLN160851-AMD1). In comparison to the Original Project scope, the Proposed Project would reduce ground disturbance and grading by over 300 cubic yards and the number of trees required for removal by 5, and proposes the construction of a 2-bedroom employee housing unit over a 760 square foot office, an 800 square foot storage building rather than 800 square feet of shipping containers, and the installation of two electric vehicle charging stations. The Proposed Project would not include the storage of equipment such as raw materials and cement silo, or the placement of storage containers. All other components of the Original Project remain stable: relocation of the commercial business to the subject property, construction of a 600-square-foot workshop, conversion of a test well into a permanent well, development on slopes, development within environmentally sensitive habitat, and installation of an on-site wastewater treatment system. In response to the adjacent property owner's concern of noise pollution, the Proposed Project would exchange the location of 600 square foot workshop with the location of the 800-square-foot storage building. Implementation of the Proposed Project would site the workshop further away from the neighboring property line.

In the aggregate, the Proposed Project consists of: 1) Combined Development Permit and General Development Plan to allow the relocation/establishment of a commercial business operation on the subject property, 2) Coastal Administrative Permit to allow conversion of a test well into a permanent well, 3) Coastal Administrative Permit and Design Approval to allow construction of a 760 square foot office with a two bedroom second story employee housing unit, a 600 square foot workshop with 300 square feet of canopy, 800 square foot storage building and associated site improvements including formalizing six (6) public parking spots and installing two electrical vehicle charging stations; and 4) Coastal Development Permits to allow development on slopes in excess of 30%, within 100 feet of ESHA and removal of 11 native trees (see **Figure 1**).

The project proposes to construct a 760-square-foot office with a second-story 2-bedroom employee housing unit. Materials and colors consist of board and batt siding ("moss" green for the office, and "oxford" (dark) brown for the workshop and storage building), bronze windows and doors, and a dark grey composition shingle roof for the residential/office unit and dark brown painted standing metal roof for the workshop and storage building. The existing storage containers[1] will be replaced with the workshop. A generator and diesel storage tanks are proposed to be moved from the former Blaze site to the Morgenrath property. On-site storage of construction aggregate and a cement silo is not proposed. The proposed 600-square-foot workshop with a 300-square-foot canopy is intended to provide indoor space for maintaining and repairing contractor equipment when necessary. The 20.5-foot-tall prefabricated structure is proposed to be assembled onsite and consists of corrugated metal siding with a standing seam metal roof.

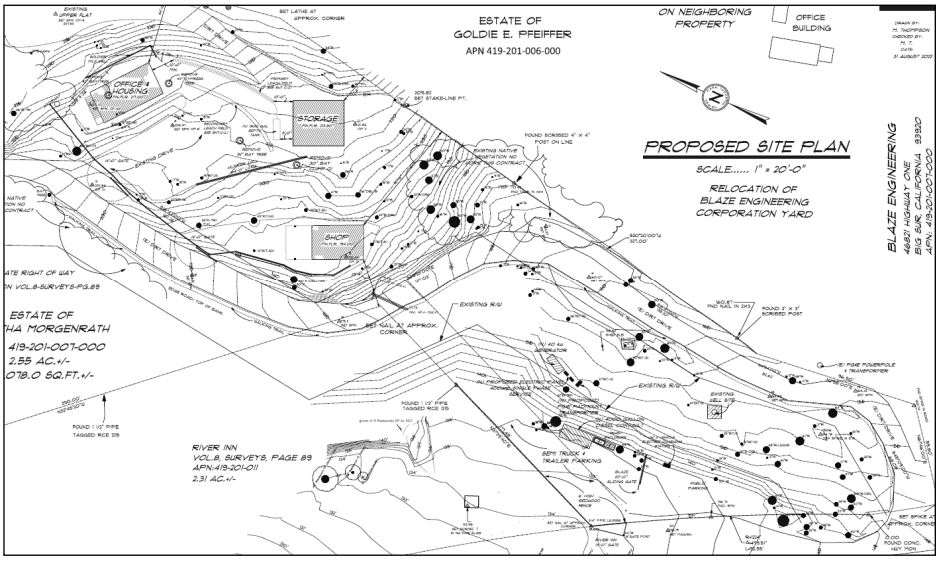


Figure 1. Project Site Plan

Site improvements for the Project include 1,360 square feet of grading and placement of structures on slopes in excess of 30%. The Project also involves the removal of 11 trees, many of which are in hazardous conditions (Source: IX.1 and IX.2). Other improvements on the site include interior driveways, a pedestrian trail along a portion of Apple Pie Ridge Road, and 3-level building pads. An existing, permitted test well is located on the lower portion of the property. Access to the site is provided by an existing driveway off Highway 1. Parking of Blaze's large construction equipment (trucks, trailers, dozers, etc.) is proposed within the existing parking area adjacent to the new parking stalls. The applicant proposes a redwood fence and gate to enclose the lower existing parking area, just north of the proposed parking stalls. A portion of the fence will be along Highway 1, while the gate will be perpendicular to Highway 1. Blaze currently has 12 employees. The Proposed Project includes six parking stalls along Highway 1 for public or River Inn employee use and 12 parking stalls adjacent the proposed development for office, employee, and administrative staff. Two of the six public parking stalls along Highway 1 will include level 2 universal electric vehicle charging stations. No work is proposed in the Highway 1 Right of Way. (Source: IX.1).

[1] On February 23, 2018, the County of Monterey issued a Design Approval (File No. PLN180139) allowing the temporary placement of (3) storage containers on the Morgenrath property until a permanent location for Blaze Engineering is secured.

Background

To put the Project in context, background information of Blaze Engineering's operations should be considered as the Project includes relocation of existing operations from one property to another. Between 1989 and 2017, Blaze's operations were conducted out of the adjacent property that borders the Morgenrath's eastern property line (Assessor's Parcel Number 419-201-006-000), hereafter referred to as the "former Blaze site." Morgenrath was notified that the lease of the adjacent property would no longer be available and the application for the Combined Development Permit was submitted to Monterey County (Source: IX.1 and IX.2). Examples of materias provided by Blaze includes concrete, rock, sand, and plumbing and landscape supplies and examples of services consist of grading, paving, installing water, septic, and electrical systems, and road building and repair. Blaze also provides heavy equiptment, fuel, and labor to the Big Sur area on an emergancy basis. For example, assistance to repair and re-open damaged roads was provided during the 1998 El Nino, 2008 Basin Complex Fire, 2013 Pfeiffer Ridge Fire, 2016 Soberanes Fire, and 2017 landslide events. The Project is intended to allow Blaze Engineering to continue their operations while also providing employee housing. The ongoing component of the Project would provide a home base for Blaze's operation with office hours Monday through Friday from 8:00am to 4:30pm. However, on-call staff is available for emergency response (Source: IX.1). Associated activities on the site will be primarily for administrative, storage, and maintenance. Based on the goods and services Blaze provides, intensive construction activities would continue to occur off-site on their client's property.

B. Surrounding Land Uses and Environmental Setting:

The Morgenrath property is an oddly-shaped 2.55 acre parcel located on the eastern side of Highway 1. Access to the site is provided by an existing driveway off Highway 1 and a right of way that traverses the property and provides access to nearby parcels. The project specific Geotechnical report describes the property to contain topography with "slight to moderate" slopes at elevations ranging between 180 to 280 feet above mean sea level. The lower elevation of the property is nearest Highway 1 while the higher elevation of the property is generally to the northeast (Source: IX.1 and IX.10). Soils range from fine sand to medium gravel with few amounts of silts and clays. The site is considered to be entirely within a Redwood Forest natural community dominated by coast redwood and co-dominated by California bay laurel. Tan oaks and coast live oaks are present but limited in numbers. Native understory plants are also limited due to invasive English ivy that dominates the understory vegetation (**Figure 2**, Source: IX.9).

Figure 2. On-Site Vegetation

The lower portion of the property contains a flat gravel parking area. This parking area is used by both Blaze Engineering to park their construction vehicles and parking for the adjacent Big Sur River Inn Motel. The Big Sur River Inn has an agreement with Morgenrath to utilize a portion of the property for off-street overflow parking.

Surrounding lands uses include rural residential parcels to the north, northeast, and east that range in size between 2 and 60 acres. Nearby visitor serving commercial uses such as inns, campgrounds, service stations, and restaurants, are found to the west and southwest. The Big Sur River is approximately 500-feet west of the site and Pheneger Creek, a tributary to the Big Sur River, is approximately 150-feet to the south (Source: IX.2 and IX.6).

The Morgenrath property is located within an area identified as the Big Sur Valley Rural Community Center. Pursuant to Section 5.3.2 of the Big Sir Coast Land Use Plan (BSC LUP), Rural Community Centers are areas with a special land use classification based on an existing variety of land use activities that provide essential services to the community and visiting public (Source: IX.3 and IX.4). Policies applicable to these centers are intended to allow developments that would continue to provide a spectrum of functions to the public and residents of the area.

As previously stated, Blaze Engineering's operations were conducted from an adjacent property to the east for approximately 28 years (**Figure 3**). Therefore, as part of the baseline condition of the immediate vicinity, analysis of impacts resulting from the project includes effects to both the physical conditions of the Morgenrath property and the spatial and functional conditions of the area at the time the application for development was made.

Figure 3. Blaze Engineering Operations on Adjacent Parcel (APN 419-201-006-000)

C. Other Public Agencies Whose Approval is Required:

The County of Monterey's Local Coastal Program (LCP) has been certified by the California Coastal Commission; therefore, the County is authorized to issue coastal development permits. Subsequent to approval of the required discretionary permits (entitlements) identified above in subsection II.A, the applicant would be required to obtain ministerial permits (e.g., construction permit) from County of Monterey Housing and Community Development (HCD) - Building Services. Review by Cal-Fire, HCD-Engineering Services and -Environmental Services, and the Environmental Health Bureau would occur during the ministerial permit process. No other public agency approvals would be required. However, approval of the proposed entitlements would be subject to appeal to/by the California Coastal Commission.

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

A. FACTORS

The environmental factors checked below would be potentially affected by this project, as discussed within the checklist on the following pages.

☒ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Geology/Soils
☒ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials	☒ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☒ Noise
☒ Population/Housing	☐ Public Services	☐ Recreation
☒ Transportation/Traffic	☒ Tribal Cultural Resources	☐ Utilities/Service Systems
☒ Mandatory Findings of Significance		

B. DETERMINATION

On the basis of this initial evaluation:

☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the Proposed Project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A SUPPLEMENTAL MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Signature

April 13, 2023
Date

Fionna Jensen, Senior Planner

V. EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).

2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS

Would the project:		New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
Key Policy 3.2.1 of the Big Sur Coast Land Use Plan (BSC LUP) prohibits all future public or private development visible from Highway 1 and major public viewing areas (the Critical Viewshed). The Morgenrath property is located directly east of Highway 1 and is within the defined Critical Viewshed. Section 3.2.5.A of the BSC LUP provides an exception to Key Policy 3.2.1 for development within Rural Community Centers, which were established to provide essential services to the community and visiting public. Map entitled Big Sur Valley North – Detail A contained in the BSC LUP illustrates that the Morgenrath property is within the Big Sur Valley Rural Community Center. In accordance with the policy above, the proposed development would be permitted under siting and design controls provided in Title 20 (coastal zone regulations) and subsequent Policy 5.4.3 of the BSC LUP. Subsection E of Policy 5.4.3 requires commercial development to carry out the rustic character of Big Sur, provide an adequate physical area to meet parking requirements and natural resource concerns, prohibits large scale commercial facilities that are unlike existing character and size of facilities in Big Sur. In addition, parking areas are required to be screened from public views from Highway 1 and should, in no event, create hazards for motorists or pedestrians.

Zoning of the property includes a Design Control District overlay and the Project is therefore subject to the requirements set forth in Chapter 20.44 of Title 20, which provides regulations for the location, size, configuration, materials and colors of structures and fences to assure protection of the public viewshed, neighborhood character, and visual integrity without imposing undue restrictions on private property.

The Big Sur Coast Highway Management Plan (CHMP) provides guidelines for Highway 1 corridor aesthetics, which are intended to provide a source of values and direction, focusing on highway construction, maintenance, and operational practices to roadside features within and beyond the right of way. Although the CHMP is not a regulatory document, it is utilized as a resource to analyze Project components that encroach upon and are within proximity to the right of way and ensure they do not impact the scenic value of Highway 1 (Source: IX.17).

Prior Environmental Analysis

The 2019 IS/MND determined that implementation of the Original Project, as conditioned, would have less than significant impact related to scenic vistas, damage to scenic resources within a State scenic highway, lighting and glare affecting nighttime views. Similarly, the 2019 IS/MND determined that changes to the visual quality and character of the project site would be less than significant. A site visit on February 18, 2018, found that the Original Project development was not visible from Highway 1 and removal of the 16 protected trees would not expose these structures. The existing vegetation and topography of the site is such that staking and flagging of the office, shop, and storage areas could not be seen from Highway 1. Although the parking area is currently being utilized for parking of Blaze Engineering's equipment and overflow parking for the River Inn Motel, implementation of the project would result in more frequent use by Blaze. Parking of Blaze's large construction equipment (e.g. trucks, trailers, dozers) within the existing parking area on the lower portion of the Morgenrath property was determined to have the greatest potential to create a significant impact when viewed from Highway 1. However, as designed, the Original Project included the construction of a 6-foot-high redwood fence on the western portion of the property along Highway 1. The fence was found to be consistent with the rural character of Big Sur and fencing guidelines contained in the CHMP and therefore would result in a less than significant impact. Exterior lighting for the Blaze operation was addressed in the General Development Plan (Source: IX.17). Lighting is limited to the entrances and exits of the office and workshop and are proposed to have recessed lighting elements where the light source would not be visible from the highway. Consistent with the County's Exterior Lighting Guidelines, applied as Condition No. 6, the General Development Plan requires the use of exterior lights that are unobtrusive, down-lit, compatible with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. No mitigations measures were identified to reduce potential aesthetic impacts to a level less than significant (Source: IX.13).

Impact Analysis

1(a), (b), (c), and (d). Conclusion: No New Impact

As discussed above, the project property is within view of Highway 1, and although the proposed development is exempt from Critical Viewshed requirements of the Big Sur Coast Land Use Plan (BSC LUP), the scenic and rural character of Big Sur is considered an important environmental resource. Hence, careful siting and design of the structures, and improvements of the lower parking area is necessary for both compliance with the BSC LUP and reducing impacts to a less than significant level. A site visit on January 6, 2023 determined that staking and flagging for the proposed office with second story apartment, workshop, storage building are not visible from Highway 1 and therefore would not result in a new impact compared to the analysis provided in the prior environmental document (Source: IX.6). The County's standard Exterior Lighting Condition of Approval would require that all exterior lights that are unobtrusive, down-lit, compatible with the local area, and constructed or located so that only the intended area is illuminated, and off-site glare is fully controlled. Similarly, the proposed 11 trees for removal would not result in conditions along Highway 1 which would expose the proposed structures. The proposed tree removal would be a reduced impact compared to the analysis in the prior environmental document. Potential impacts from the parking of construction equipment in the lower portion of the project site would be unchanged with implementation of the Proposed Project.

The Proposed Project includes the installation of two electric vehicle charging stations (ChargePoint CT4021 EV Charge Station – Dual Port Bollard Mount model, or a similar station), and the striping of six parking stalls adjacent to Highway 1, between the proposed gated parking area for large equipment and the Highway 1 right of way. Members of the public as well as employees of River Inn and residences who live along Apple Pie Ridge Road currently utilize this area for parking, although it is not formalized (no stall striping). The proposed white striping would be consistent with the surrounding roadway markings and therefore would result in a less than significant impact. However, the two electric vehicle charging stations would be entirely visible from Highway 1 and therefore would have the greatest potential to create a significant impact when viewed from Highway 1. The charging stations consist of a light gray metal bollard cover with black charging ports/plugs, a small approximately 3 by 4-inch LED informational screen, and an orange identifier stating "EV CHARGING ONLY" (see **Figure 4** below).

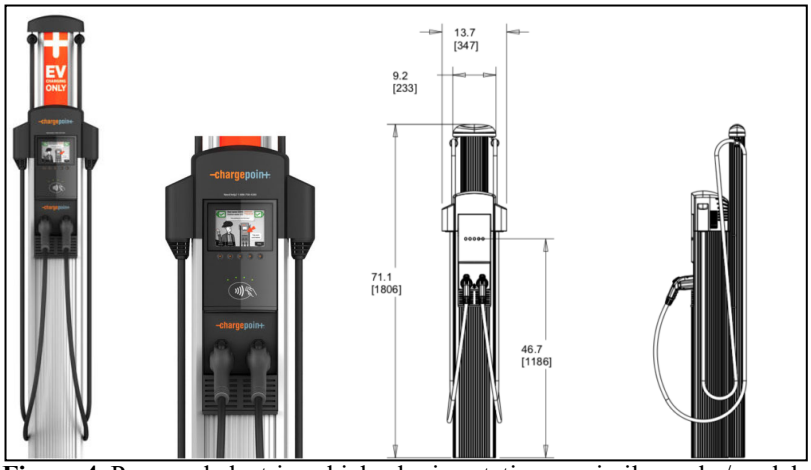


Figure 4. Proposed electric vehicle charing station, or similar make/model.

Therefore, although all other components of the Proposed Project would result in no new impacts compared to the 2019 IS/MND, the proposed installation of two electric vehicle charging stations would potentially result in significant impacts related to the scenic vista, visual character of the site and its surrounding, and day and nighttime lighting/glare. When in use, the charging vehicles will shield the majority of the 6-foot-high charging stations, resulting in only a portion being visible from Highway 1. Additionally, although the proposed charging station LCD screen is relatively small, it would have the potential to be visible during the day and night. However, as conditioned, the proposed electric vehicle charging station (ChargePoint CT4021 EV Charge Station – Dual Port Bollard Mount model, or a similar make and model) would be altered to minimize the potential visibility. Condition No. 7 would require that the Applicant/Owner install redwood siding around the metal bollard cover/exterior, as to not impede the functionality of the charging station, paint or cover the orange sign with an earth-toned color, and place a tinted film on the LCD screen. Final alterations shall be reviewed and approved by HCD-Planning staff. These measures would make the charging station blend in with the surrounding natural environment dominated by Redwood trees, compatible with the rural community of the surrounding community center, minimize and control illumination and visibility. Therefore, as designed and conditioned, impacts of the Proposed Project would be less than significant.

2. AGRICULTURAL AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Prior Environmental Analysis

The 2019 IS/MND concluded that the Original Project site does not contain farmland designated as Prime, Unique, of Statewide or Local Importance, or under Williamson Act contract, has not been used for agricultural uses, and is not encumbered by a Williamson Act. Additionally, it was determined that the Project would not convert farmland to non-agricultural uses or involve the conversion of forest land to non-forest use. Therefore, the Original Project was deemed to result in no impacts related to agricultural resources (Source: IX.13).

Impact Analysis

2(a), (b), (c), (d), and (e). Conclusion: No New Impact

Based on review of Monterey County GIS, the Project site is not used for agricultural production and is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Source: IX.2). Therefore, the Proposed Project would not convert Prime Farmland, Unique

Farmland, Farmland of Statewide Importance, or any other type of farmland to non-agricultural uses. No new impacts or substantially more severe significant impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur. The Project site is not currently used for agricultural purposes, and is not protected by, or eligible for, a Williamson Act contract (Source: IX.1 and IX.6). Neither the Project site nor the surrounding area is zoned for forest land, timberland, or timberland production. Although the biological report (Source: IX.9) indicates that the site is entirely within a Redwood Forest natural community, it is not considered a forest or timber resource inventoried as "Demonstration State Forest" and the project would have no impact on forest resources. No additional analysis is required.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
d) Result in significant construction-related air quality impacts?	☐	☐	☐	☒
e) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
f) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

The 2012-2015 Air Quality Management Plan (AQMP) for the Monterey Bay region address attainment and maintenance of state and federal ambient air quality standards within the North Central Coast Air Basin (NCCAB) that includes unincorporated Big Sur (Source: IX.20). California Air Resources Board (CARB) uses ambient data from each air monitoring site in the NCCAB to calculate Expected Peak Day Concentration over a consecutive three-year period.

Prior Environmental Analysis

The 2019 IS/MND concluded that since the Original Project included relocation of an existing operation from the former Blaze site to the Morgenrath property, operational emissions are expected to remain unchanged compared to baseline conditions. County staff confirmed this through consultation with Monterey Bay Air Resources District (MBARD) staff on August 3, 2018. It was determined that the relocation would not make any changes to operations that would cause an increase in air pollutants other than temporary impacts associated with construction. Additionally, because the Original Project did not include residential development, it would not result in a population increase not already accounted for in the AQMP. The Construction Management Plan submitted with the application limits proposed grading for site improvements to no more than 100 cubic yards per day and would not involve moving dirt exceeding the PM10 threshold of 2.2 acres of disturbance per day. All other construction emissions were determined to be accounted for in the AQMP. Impacts related to odors were also determined to be less-than-significant (Source: IX.13).

Impact Analysis

3(a), (b), (c), (d), (e) and (f). Conclusion: No New Impact

The project site is located within the North Central Coast Air Basin, which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). The Proposed Project would involve approximately 293 cubic yards of cut, 478 cubic yards of fill, with 185 cubic yards of import. There would be no net export of grading materials (Source: IX.1). Compared to the analysis of the prior environmental document, the proposed grading quantities would be reduced by over 300 cubic yards, resulting a in reduced impact (Source: IX.13). The MBARD *CEQA Air Quality Guidelines* (Source: IX.14) defines construction activities with potentially significant impacts for PM10 if they include 2.2 acres of disturbance per day. Accordingly, the draft Construction Management Plan limits daily grading to 100 cubic yards and daily disturbance to less than 2.2 acres as to not exceed the PM10 threshold. Operational emissions would be minimal. Grading on the site would be subject to the regulations contained on Monterey County Code sections 16.08 – Grading and 16.12 – Erosion Control. Implementation of these requirements would ensure dust from grading activities are controlled. Impacts to air quality from construction-related activities would be minor and temporary in nature. Construction would involve equipment typically involved in residential and small-scale commercial construction projects, such as excavators and trucks. Therefore, although the closest sensitive receptor (a single family dwelling) is located less than 200 feet away from the proposed development, temporary construction-related impacts would not violate any air quality standards or obstruct implementation of the MBARD Air Quality Management Plan and on-going operational emissions would not expose nearby residences or other sensitive receptors to substantial pollutant concentrations (Source: IX.16). Therefore, there is no indication that construction of an office with a second story apartment, a workshop, and storage building would cause significant impacts to air quality or greenhouse gas emissions, and no additional environmental analysis is needed.

4. BIOLOGICAL RESOURCES **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Monterey County Geographic Information System (GIS) and the Big Sur Coast Coastal Implementation Plan Environmentally Sensitive Habitat Areas (ESHA) map indicates that the Morgenrath property has the potential to contain rare, endangered, or sensitive plant habitats. Policy 3.3.1 of the Big Sur Land Use Plan (BSC LUP) and Section 20.145.040 of the Coastal Implementation Plan (CIP) require the preservation of environmentally sensitive habitats through the implementation of development standards that maintain, restore, and if possible, enhance ESHA (Source: IX.3 and IX.4). In accordance with these regulations, a biological survey prepared by Fred Ballerini on October 23, 2017, as amended on March 26, 2020 and September 6, 2022 (Source: IX.9), was submitted to identify ESHA on the property and determine if the Project would have the potential to result in an impact to that ESHA. The project Biologist notes the Morgenrath property lies entirely within a Redwood Forest natural community dominated by coast redwood (Sequoia sempervirens) and co-dominated by California bay (Umbellularia

California). Tan-oak (Notholithocarpus densiflorus), coast live oak (Quercus agrifolia), and Shreve oak (Quercus parvula var. shrevei) were also found onsite, but in limited amounts. Very little native understory plants, such as sword fern (Polystichum munitum), thimbleberry (Rubus parviflora), Douglas' iris (Iris douglasiana), redwood sorrel (Oxalis oregana), California hedgenettle (Stachys bullata), and poison oak (Toxicodenron diversilobum), were found onsite as non-native invasive English ivy (hedera helix) dominates the understory and is found climbing up the trunks of many on-site trees (Source: IX.9).

Prior Environmental Analysis

The 2019 IS/MND determined that the Morgenrath property does not support federally protected wetlands and is not under provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other approved conservation plan and therefore would have no impacts to these biological resources. No special status species were found and impacts to such species were determined to be low. However, the Original Project included the removal of 16 native trees due to condition and location within the construction footprint. The project Arborist concluded that this tree removal was the minimum necessary for development and to reduce the risk of tree failure that would be a hazard to people or structures. The prior environmental analysis also determined that the Original Project would have a less than significant impact on the movement of native resident or migratory fish or wildlife species with implementation of the County's standard Migratory Bird Treaty Act Condition of Approval which requires a nest survey if tree removal or construction activity commences during the typical bird nesting season. The 2019 IS/MND included the adoption of four mitigation measures, as listed below, to ensure impacts to biological resources were less than significant (Source: IX.13).

BIO-Mitigation Measure No. 1 *Monitoring of Grading and Construction Activities.* For the protection of tree resources and to ensure grading and construction activities are conducted in accordance with the recommendations contained in the Tree Resource Evaluation Project Impact Analysis (Planning File LIB170437), the owner/applicant shall enter into a contract with a certified arborist (project arborist),

BIO-Mitigation Measure No. 2 *Tree Protection.* In order to prevent construction activities from damaging trees within the tree protection zone, the owner/applicant shall develop a Tree Protection Fencing plan for all trees within 30-feet of the development area. The plan shall be developed in consultation with the project arborist and submitted to RMA-Planning for review and approval.

BIO-Mitigation Measure No. 3 *Construction Management Plan.* In order to ensure best management practices are followed during construction activities, the owner/applicant shall prepare a final Construction Management Plan. The plan shall be consistent with the preliminary drawing, developed in consultation with the project arborist, and submitted to RMA-Planning for review and approval.

BIO-Mitigation Measure No. 4 *Restoration and Fuel Management Plan.* In order to eradicate invasive plant species and enhance and maintain native habitats onsite, the owner/applicant shall prepare a final Restoration and Fuel Management Plan. The plan shall be consistent with the preliminary drawing and submitted to RMA-Planning for review and approval.

4(a) and (b). Conclusion: Less Than Significant Impact with New/Revised Mitigation Incorporated.

The Proposed Project would utilize existing disturbed areas such as roadways, building pads, and an existing parking area resulting in siting and a design that minimizes disturbance to biological resources to the maximum extent feasible. However, the site contains Redwood Forest natural community, and the proposed construction and tree removal would occur in proximity of areas identified as ESHA. The Proposed Project would require the removal of 11 native trees. BSC LUP Policy 3.3.2.1 states that development, including vegetation removal, shall not be permitted in ESHA if it would result in any potential disruption of habitat value (Source: IX.3 and IX.4). To approve development within any of these habitats the County must find that disruption of a habitat caused by the development is not significant.

To ensure potential impacts to the Project site's special natural communities, which is limited to the Redwood Forest, would be less than significant, the project biologist recommended implementation of BIO-Mitigation Measure Nos. 1 through 4, as established in the prior environmental analysis (Source: IX.13). Although Mitigation Measure Nos. 1 through 4 would be applicable to the Proposed Project as impacts to the project site's Redwood Forest community are unchanged and potentially reduced, the project biologist identified a potential impact to wildlife species of special concern which was not previously analyzed. Mitigation Measure No. 1, as detailed in the 2019 IS/MND, and in conjunction with Mitigation Measure Nos. 2 and 3, would reduce potential impacts to the project site's Redwood Forest community to a level of less than significant. The Project would involve the removal of five less trees than analyzed in the prior environmental document and potential impacts to forest resources would be reduced (Source: IX.1 and IX.13). However, modifications to BIO-Mitigation Measure No. 2 (Tree Protection) are needed to accurately reflect the Proposed Project and make the 2019 IS/MND analysis adequately apply. Revisions are provided below.

BIO-Mitigation Measure No. 2 *(*<u>Revised</u>*)*: *Tree Protection.* In order to prevent construction activities from damaging trees within the tree protection zone, the owner/applicant shall develop a Tree Protection Fencing plan for all trees within 30-feet of the development area. The plan shall be developed in consultation with the project arborist/<u>biologist</u> and submitted to HCD-Planning for review and approval. The Tree Protection Fencing plan shall demonstrate how the following measures shall be implemented:

- Demarcate installation of protection fencing consistent with the recommended <u>"TREE PRESERVATION SPECIFICATIONS" and "UPDATED TREE PLAN"</u> ~~plan~~ found ~~on page 15 of the~~ <u>in the</u> "Tree Resource Evaluation Project Impact Analysis", dated October 6, 2017 (Monterey County Document No. LIB170437), prepared by Maureen Hamb-WCISA, and amended on June 19, 2019 and August 31, 2022.

- Provide protection fencing along the critical root zones of the coast redwood trees near the development area.
- ~~Provide special protection methods for Tree Nos. 13 (52-inch Coast redwood) and 14 (40-inch Coast redwood). Due to their proximity of the proposed driveway, exclusionary fencing will not be possible. Protection shall occur by using straw bale barricades secured to the tree trunks.~~
- Place straw bales, from end to end, inside of the protection fencing to act as a barricade to limit damage to the fencing, prevent grading spoils from encroaching into the critical root zone area, and prevent excess moisture from gathering under the retained trees.
- Maintain the natural grade around trees. Grading shall not be permitted to sever major roots of redwood or oak trees. No additional fill or excavation shall be permitted within the critical root zone of trees. If major tree roots that are 2-inches or greater are unearthed during the construction process, the project arborist/biologist shall be notified immediately. Work shall be halted and roots shall be covered with moistened burlap until a determination is made by the project arborist/biologist.
- Unauthorized pruning of any tree shall be prohibited. Any required pruning shall be done on the authority of the project arborist/biologist and to the International Society of Arboriculture (ISA) pruning guidelines and Approved American National Standard (ANSI) A300 pruning standards.
- All trenching onsite shall be approved by the project arborist/biologist.
- A qualified arborist/biologist shall review in the field the locations of the proposed boring holes prior to construction of the soldier pile wall, hilfiker wall, and privacy fencing. Holes should be manually dug with a hand auger to limit potential tree root impacts.

  Mitigation Measure Monitoring Action No. 2a: Prior to approval of construction permits for grading and building, the owner/applicant shall develop and submit a Tree Protection Fencing plan, as described in Mitigation Measure No. 2, to HCD-Planning for review and approval. The approved Tree Protection Fencing plan shall be incorporated into the approved set of job-site and office-copy construction plans for grading and/or building.

  Mitigation Monitoring Action No. 2b. Prior to issuance of construction permits for grading and building, the owner/applicant shall provide evidence to HCD-Planning documenting installation of the protective fencing and straw bale barriers for review and approval.

  Mitigation Monitoring Action No. 2c. Prior to final of construction permits for grading and building, the owner/applicant shall submit documentation that implementation of the Tree Protection Fencing plan has been successful to HCD-Planning for review and approval.

Mitigation Measure No. 2, Tree Protection, shall work in conjunction with Mitigation Measure No. 3, Construction Management Plan. Mitigation Measure No. 3 remains the same as detailed in the 2019 IS/MND.

The Redwood Forest understory layer is dominated by a nearly solid carpet of invasive English ivy (*Hedera helix*) throughout the parcel which also envelops coast redwood and many

California bay laurel trunks and upper canopies within the parcel and adjacent parcels. English ivy is classified by the California Invasive Plant Council (Cal-IPC) as having high-level adverse impacts on native ecosystems. English ivy is also listed by the California Department of Fish and Wildlife as an invasive species that should be avoided and not planted as it is noted to outcompete and shade native understory vegetation, prevent sapling germination, displace wildlife, and kill overstory trees by dominating the canopy cover. Italian thistle, veldt grass, French broom and sticky eupatorium are all listed by the Cal-IPC as invasive species that adversely impact native plant communities and are also found throughout the site in disturbed soil locations (Source: IX.9). Therefore, implementation of Mitigation Measure No. 4, as detailed in the 2019 IS/MND, will eradicate the invasive plant species and enhance and maintain native habitats onsite (Source: IX.13).

The second supplemental Biologist report (Source: IX.9) noted that the Project site has the potential to provide habitat for the Coast range newt (CRN; *Taricha torosa torosa*), which is considered a species of Special Concern by the California Department of Fish & Wildlife. This species breeds in March and April in still or slow-moving water with eggs attached to submerged vegetation. When not breeding, they are found in a range of habitats, including dry woodland associates, living in moist conditions under woody or leafy debris. The Pheneger Creek drainage corridor south of the parcel may provide favorable conditions for the species to persist and potential habitat exists on the site within the piles of wood debris and logs that are scattered along the parcel. Additionally, although the Santa Lucia slender salamander (SLSS; *Batrachoseps luciae*) is a CNDDB listed species with no legal or regulatory status, the species also likely persists on site due to favorable moist habitat conditions (Source: IX.9). Impacts to these two species would be less than significant with implementation of the Mitigation Measures No. 5, which requires requiring pre-construction surveying.

Additionally, consultation with the California Department of Fish and Wildlife (CDFW) occurred in March 2023 (Source: IX.21) and identified Foothill yellow-legged frogs, western bumble bees, and raptors, as being species of concern for the Proposed Project. Foothill yellow-legged frogs (FYLF) are primarily stream dwelling species which require shallow, flowing water in streams and rivers with substrate. FYLF are listed as State threaten or endangered species under the California Environmental Species Act (CESA). The CDFW notes that habitat loss from growth of cities and suburbs, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control, degraded water quality, and introduced predators, such as bullfrogs, are the primary threats to FYLF. Based on review of CDFW's Biogeographic Information and Observation System mapping system, FYLF have been documented at the Big Sur River which is roughly 0.2 miles from the Project site. Therefore, FYLF have the potential to occur within the vicinity of the Project site as the Pheneger Creek drainage corridor is situated south of the parcel and may provide favorable conditions for the species to persist. Implementation of Mitigation Measure No. 5 would result in less than significant impacts to FYLF.

BIO-Mitigation Measure No. 5: *Pre-Construction Survey.* The project biologist shall conduct pre-construction surveys in suitable habitat for the Coast range newt (CRN), Santa Lucia slender salamander (SLSS), Foothill yellow-legged frogs (FYLF), where project-related grading is proposed. Surveys shall be conducted within seven days prior to construction. Dip-netting shall be a prohibited survey method for locating potential Foothill yellow-legged frogs. Should CRN,

SLSS, or FYLF be identified, the project biologist shall consult with California Department of Fish and Wildlife to establish appropriate avoidance measures, including but not limited to exclusionary fencing or relocation, subject to the issuance of an Incidental Take Permit (ITP). Should an ITP be required, evidence of the CDFW issued ITP shall be submitted to HCD-Planning prior to commencement of relocation activities.

> **Mitigation Measure Action No. 5a**: Prior to the issuance of permits from Building Services, the applicant/owner shall submit to HCD-Planning for review and approval a copy of a contract with a qualified biologist to conduct the required pre-construction surveys for CRN, SLSS, and FYLF.
>
> **Mitigation Measure Action 5b**: Prior to final inspection from Building Services, applicant/owner shall submit to HCD-Planning a brief report prepared by the project biologist as to incidents regarding CRN and SLSS.

As of September 30, 2022, the Western Bumble Bee is a candidate species under CESA and as such, receives the same legal protection afforded to an endangered or threatened species. The WBB feeds upon nectar and pollen from a variety of plants species, but is most adapted to native plant species. The flight period in California is from early February to October, peaking in late June and late September. The flight period for workers and males is from early April to early November. The species is currently restricted to high elevation sites in the Sierra Nevada and scattered coastal areas. WBB primarily nest underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under brush piles, in old bird nests, and in dead trees or hollow logs. Overwintering sites utilized by WBB mated queens include soft, disturbed soil, or under leaf litter or other debris. CDFW's consultation letter states that WBB have the potential to occur within the vicinity of the project and therefore would be potentially impacted by project implementation (Source: IX.21). The Project Biologist confirmed via phone on April 5, 2023, that the WBB has the potential to occupy the site given the project site's liter debris and dead logs. Should WBB colonies or overwintering queens be present in underground nests in work areas, work activities related to the Proposed Project could adversely affect this species and its habitat. Therefore, mitigation would be required to reduce impacts to a level of less than significant.

BIO-Mitigation Measure No. 6: *Western bumble bee Protection*
A pre-construction survey shall be prepared by the Project Biologist during typical flying season (March 1 through September 1) to determine the presence of Western bumble bee (WBB) or potential habitat. If no WBB and/or potential WBB habitat is identified, no further mitigation is required. If WBB and/or potential habitat are identified the following actions shall be adhered to:

- If project-related ground disturbance occurs during this species' nesting period, a minimum of a 50-foot buffer shall be established around mammal burrows and thatched/bunch grasses. If mammal burrows and thatched/bunch grasses are within project grading limits, the Project Biologist shall consult with CDFW to prepare a plan to protect bumble bee nests and individuals to ensure no take of WBB occurs.
- If project-related ground disturbance occurs during this species' overwintering period of October through February, the Project Biologist shall consult with CDFW to prepare a plan to protect bumble bee nests and individuals to ensure no take of WBB occurs.

Mitigation Measure Action No. 6a: Prior to the issuance of permits from Building Services, the applicant/owner shall submit to HCD-Planning for review and approval the results of the WBB survey. If WBB and/or potential habitat are identified, the Project Biologist shall adhere to the language of this condition.

Therefore, with the implementation of 2019 IS/MND Mitigation Measures BIO-1, 3, and 4, and revised/new Mitigation Measures BIO-2, 5 and 6, the project would have a less than significant impact on sensitive natural communities and/or candidate, sensitive or special status species.

Impact Analysis

4(c), (d), (e), and (f). Conclusion: No New Impact

Based on Monterey County GIS (Source: IX.2) and information contained in the prepared biological reports (Source: IX.9) indicates that the Morgenrath property does not support federally protected wetlands and is not under provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other approved conservation plan. Therefore, implementation of the Project would have no new impacts to these resources. Based on the results of the biological assessments prepared for the project, the project site is not located in an established migratory wildlife corridor and would not impede the use of native wildlife nurseries (Source: IX.9). Therefore, implementation of the Proposed Project would not new result in impacts to wildlife movement corridors or native wildlife nurseries and no mitigation is required. No additional analysis is required. The Original Project involved the removal of six bay laurels ranging from fair to poor health and structure, two Oak trees in poor health and structure, one Cypress tree in fair health and structure, and one Redwood in good health and structure, for a total of 16 trees being removed (Source: IX.13). The Proposed Project would only require the removal of 11 trees (Source: IX.1). As analyzed in the 2019 IS/MND, proposed removal would not result in the fragmenting of an intact forest system, create a new forest edge, or impact the existing quality of the system, however removal required the granting of a Coastal Development Permit (Source: IX.3 and IX.4). To grant the Coastal Development Permit, the County must make the finding that the tree removal is the minimum required and that the removal will not result in a significant environmental impact. The County's standard condition of approval requiring a nesting survey if tree removal or construction activity commences during the typical bird nesting season would be applied to the Proposed Project. Additionally, the County's standard Tree Replacement condition of approval would be applied as Condition No. 8, requiring the Applicant/Owner to replant 11 Coast redwood species on-site and have the Project Biologist monitor success for five years. Therefore, as proposed and conditioned, the Proposed Project would not conflict with any local policies, such as a tree preservation ordinance. No additional analysis is required.

5. CULTURAL RESOURCES **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☐	☐	☒

5. CULTURAL RESOURCES Would the project:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
Section 3.11 of the Big Sur Coast Land Use Plan states that the Big Sur coastal area is considered to be one of the most significant archaeological regions in California. Therefore, Key Policy 3.11.1 requires the protection and maintenance of Big Sur's archaeological resources. Monterey County Geographic Information System indicates that the Morgenrath property is located within an area of moderate archaeological sensitivity. In accordance with Section 20.145.120.B.1.b of the Big Sur Coastal Implementation Plan, an archaeological survey report is required for developments within low and moderate archaeological sensitivity zones when such development is subject to environmental review per the CEQA Guidelines (Source: IX.3 and IX.4). Consistent with this policy, a Preliminary Archaeological Assessment (Monterey County Library No. LIB170438, Source: IX.8) was prepared and submitted for the Project, which included the review of prior background research at the Northwest Information Center of the California Historical Resources Information System at Sonoma State University and an onsite physical inspection of the site. The Assessment concluded that there is no evidence of potentially significant archaeological resources within the portions of the Morgenrath property examined (Source: IX.8). The following discussion is based on the Preliminary Archaeological Assessment.

Prior Environmental Analysis
The 2019 IS/MND concluded that although the property was located in an area of moderate archaeological sensitivity, the construction of the Original Project would result in no impacts to a historical resource, unique paleontological resource, or unique geological features because none of these resources or features were identified on the project site (Source: IX.8 and IX.13). Similarly, no impact or disturbance to human remains would occur with implementation of the Original Project. However, the 2019 IS/MND disclosed that the Original Project could result in disturbance to an archaeological resource. Therefore, the County's standard condition of approval requiring work be halted if cultural resources or human remains are found and evaluation of the find by a qualified professional archaeologist was applied to the Original Project. The 2019 IS/MND determined that adherence to this condition of approval would reduce impacts to archaeological resources to a level of less than significant (Source: IX.13).

Impact Analysis
5(a), (b), (c), and (d). Conclusion: No New Impact.
Neither the Archaeological Assessment (Source: IX.8) nor the Geological report (Source: IX.12) indicate that the Morgenrath property has the potential to contain unique paleontological resources or geologic features. Therefore, implementation of the Project would have no impact to historic resources, human remains interred outside of formal cemeteries, or unique

paleontological resources or geological features. Further, the Archaeological Assessment concludes that there is no evidence of potentially significant archaeological resources within the portions of the Morgenrath property examined (Source: IX.8). In comparison to the Original Project, the Proposed Project reduces ground disturbance by over 300 cubic yards and the number of trees required for removal by 5 (11 total) (Source: IX.13). Construction of the second-story employee housing unit will not result in additional ground disturbance not analyzed in the 2019 IS/MND. The proposed EV charging stations are sited on a portion of the proposed already disturbed by paving and vehicle use. In comparison to the 2019 IS/MND, the Project switches the location of the proposed 600-square-foot workshop and 800-square-foot storage building. No additional ground disturbance is required by exchanging the building footprints. As disclosed in the 2019 IS/MND, due to Big Sur's rich archaeological history and the site's moderate archaeological sensitivity, there is the potential to accidentally uncover unidentified cultural resources or human remains during earth disturbance activities. Therefore, the County's standard condition of approval requiring work be halted if cultural resources or human remains are found is still applicable to the Project. No additional analysis is required.

6. GEOLOGY AND SOILS **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Chapter 18A of the 2007 California Building Code, creating substantial risks to life or property?	☐	☐	☐	☒

6. GEOLOGY AND SOILS Would the project:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
The Monterey County Geographic Information System does not contain data for seismic hazards and shows the. However, it does indicate that the Morgenrath property contains low liquefaction risk, both low and high landslide risk, moderate and high erosion potential, and is located within 660 feet of an active or potentially active fault(Source: IX.2). In accordance with General Policies 3.7.2 and Specific Policies for geologic hazards in 3.7.3.A of the Big Sur Coast Land Use Plan (BSC LUP) and Section 20.145.080.A.1.b of the Big Sur Coastal Implementation Plan (CIP), submittal of a geologic and geotechnical report was required as part of the Project application to ensure proposed development is sited and designed to minimize risk from geologic hazards to an acceptable level. Consistent with these requirements, the application for the Project included a Geologic Report (Source: IX.12) and Geotechnical Report (Source: IX.10). Together, these reports analyzed the geological suitability of the site and evaluated its geotechnical properties. The Project includes installation of a septic facility to dispose of wastewater. The below discussion is based on these reports.

Prior Environmental Analysis
The 2019 IS/MND concluded that the Original Project would not expose people or structures to potential substantial adverse effects caused by fault rupture, landslides, liquefaction, or expansive soils. The prepared geological and geotechnical reports found no evidence indicating that a fault rupture or landslide has occurred at the site and that soil conditions are not susceptible to liquefaction or considered to be expansive soils. The 2019 IS/MND determined that the Morgenrath site would have the potential to experience seismic ground shaking since the Original Project involved the establishment of new structures, and the Original Project would potentially expose people or structures to strong seismic ground shaking. Additionally, it was found that the Morgenrath property contained areas with moderate and high erosion potential. To ensure the proposed improvements are constructed in accordance with the requirements of the California Building Code and the recommendations contained in the Geotechnical Report, which included use of engineered fill, a condition of approval was applied to the project requiring the applicant to provide documentation from a licensed practitioner certifying that all development has been constructed in accordance with the Geotechnical Report. The 2019 IS/MND found that with the application of these conditions of approvals and compliance with the required California and Monterey County Building Codes, the project would result in less than significant impacts to soul erosion and seismic ground shaking (Source: IX.13).

Impact Analysis
6(a), (b), (c), (d), and (e). Conclusion: No New Impact.
Monterey County is recognized to contain a number of faults, two of which are found in the Big Sur segment: San Gregorio-Palo Colorado and the Sur-Nacimiento Faults. Monterey County

Geographic Information System shows that the nearest fault is the San Gregorio Fault which bisects the southern portion of the Morgenrath property. However, the Geologic Report (Source: IX.12) provides a map showing the fault just outside of the property, along and Highway 1 and passes through the adjacent River Inn property. The Geotechnical Report (Source: IX.10) specifies that the fault is approximately 300 feet southwest of the Morgenrath property. Both reports identify the fault as Late Quaternary (movement between the last 0.5 to 1 million years ago) but found no evidence indicating a fault rupture has occurred at the site. Although the Proposed Project includes the construction of a second-story employee housing unit and therefore increases the number of occupants who may experience strong seismic shaking, these reports conclude that surface rupture from fault activity or lateral spreading is considered improbable. Further, Monterey County Code and California Building Code require construction to meet specific earthquake-related design standards. The Geotechnical and Geological Reports (Source: IX.10 and IX.12) found no evidence of landslides above or below the proposed building sites, and determined that the property's soil makeup is considered not to be susceptible to liquefaction or considered expansive soils. The Proposed Project will require 293 cubic yards of cut and 478 cubic yards of fill (Source: IX.1). This represents a reduction of more than 300 cubic yards of grading when compared to the Original Project (Source: IX.13). All recommendations of the Geological and Geotechnical Report shall be incorporated into the final construction plans, pursuant to Monterey County Code Section 16.08.110. Previously analyzed conditions of approval requiring an erosion control plan and certification that the project incorporated all geotechnical recommendations will be applied to the project. In conclusion, no new impacts to geology and soils would occur and therefore no additional analysis is required.

7. GREENHOUSE GAS EMISSIONS **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

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 *22012-2015 Air Quality Management Plan for the Monterey Bay Region* (AQMP) (Source: IX.14) which evaluates a project's potential for a cumulative adverse impact on regional air quality (ozone levels).

Prior Environmental Analysis

The Original Project included the relocation of an existing operation from the former Blaze site to the Morgenrath property. From a GHG emission standpoint, the 2019 IS/MND determined that this would result in no change the baseline of the surrounding area. Per a discussion with County staff and MBARD staff on August 3, 2018, the 2019 IS/MND found that the Original Project would not conflict with or obstruct implementation of the AQMP. There would be no change to current stationary emissions as a result of the Project. The 2019 IS/MND concluded that the Original Project would result in less than significant impacts greenhouse gas emissions because the project would only result in typical temporary GHG emissions during construction activities and would not conflict with any plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (Source: IX.13).

Impact Analysis

7(a) and (b). Conclusion: No New Impact

As analyzed in the 2019 IS/MND, relocation of Blaze Engineering from the neighboring property to the subject property is still required. In comparison to the Original Project, the Proposed Project includes construction of a 760 square foot second story employee housing unit (2 bedrooms) and an 800 square foot storage building (rather than installation of shipping containers), and the installation of two EV charging stations (Source: IX.1 and IX.13). The additional construction will result in additional GHG emission, however all emissions will be temporary and typical of any construction. 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 construction and grading 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. Additionally, the Proposed Project will not result in any additional stationary emissions not analyzed in the 2019 IS/MND and therefore will not conflict with the AQMP. Further, the Proposed Project's required grading is approximately 300 cubic yards less than previously analyzed and therefore will reduce the quality of GHG emissions required during grading activities. Implementation of the Project would not result in a new impact and would not produce more than the threshold of significance of 82 pounds per day of GHG precursors. Therefore, no additional analysis is required.

8. HAZARDS AND HAZARDOUS MATERIALS **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Blaze Engineering requires relocation of an existing operation from the former Blaze site (neighboring property) to the subject property, the Morgenrath property. This existing operation included, and would continue to include, handing and storing of oil for use in vehicles, waste oil from their vehicles, oxygen and acetylene tanks, liquid petroleum gas, and diesel fuel for their construction vehicles. Per the prepared General Development Plan (GDP) (Source: IX.1), waste oil would be picked up and recycled by a licensed hauler as needed, Construction and demolition materials are recycled at each construction site and hauled to the Monterey Regional Waste Management District (MRWMD) landfill in Marina, California for recycling, and solid waste

and recyclables will also be hauled to the MRWMD landfill. Blaze Engineering has an up-to-date Business Response Plan and Inventory.

Prior Environmental Review
The 2019 IS/MND concluded that the Original Project is not located within 0.25 miles of a school, is not located within an airport land use plan or within two miles of a public airport, is not categorized as a hazardous materials site pursuant to Government Code Section 65962.5, and would not interfere with an adopted emergency response plan, and therefore would have no impacts. However, the prior environmental analysis found that the project would result in less than significant impact as it relates to exposing people or structures to wildfires, disposing hazardous materials into the area and creating accident conditions involving the release of hazardous materials into the environment. Implementation of the proposed Landscape and Fuel Management Plan and building in accordance with Monterey County Code would reduce the Project's risk of loss, injury, or death relative to wildland fires to less than significant (Source: IX.13). At the time of prior environmental analysis, Blaze Engineering was permitted by the Monterey County Environmental Health Bureau as a Hazardous Waste Generator for its above ground fuel storage tank (Facility ID No. FA0813374). A Condition of Approval was applied to the Original Project requiring that the Hazardous Waste Generator permit be updated with the operation's address and site location, hazardous materials/waste inventory list, and California Environmental Reporting System registration (Source: IX.13).

Impact Analysis
8(a), (b), (c), (d), (e), (f), and (g). Conclusion: No New Impact.
Handling and storage of hazardous materials is unchanged in the Proposed Project. Blaze Engineering continues to be permitted by the Monterey County Environmental Health Bureau (EHB) as a Hazardous Waste Generator for their above ground fuel storage tank (Facility ID No. FA0813374). The previously applied condition of approval requiring the applicant to provide EHB's Hazardous Materials Management Services with an update on: the operation's address and site location, hazardous materials/waste inventory list, and California Environmental Reporting System registration is still applicable and will be applied to the project. Implementation of this condition would ensure the operational component of the Proposed Project would be consistent with the requirements set forth in Monterey County Code Chapters 10.65 (Hazardous Materials Registration) and 10.67 (Hazardous Materials Emergency Response). No project components would result in new potentially significant impacts relative to the transportation, disposal, or emittance of hazardous materials or result in a conflict with an adopted emergency response plan or emergency evacuation plan.

Data contained in the Monterey County Geographic Information System (Source: IX.2) indicates that the Morgenrath property, and much of the surrounding area, is designated as a "Very High" State Responsibility Fire Hazard Zone. The Proposed Project has been reviewed by the Big Sur Volunteer Fire Brigade and no conditions of approval were applied. The Proposed Project does not introduce any additional development which would require implementation of additional fuel management standards to reduce risk to property or life. Final construction plans shall implement the standards of the prepared landscape and fuel management plan. Although the Proposed Project includes the handling and storage of hazardous materials, the Monterey County Geographic Information System and Google Earth Imagery confirms that the Morgenrath property is not located within one-quarter mile of a school. Captain Cooper Elementary School

and Apple Pie Pre-School is located approximately 0.41 miles from the closest edge of the Morgenrath property (Source: IX.2 and IX.16). With the exception that Blaze was contracted with either school to provide maintenance or emergency work, it would be unlikely that Blaze equipment and vehicles transporting hazardous materials would occur with one-quarter mile. Based on review of Monterey County Geographic Information System (Source: IX.2), the Morgenrath property is not within an area subject to an airport land use plan, within 2 miles of an airport, or within the vicinity of a private airstrip. Therefore, the Proposed Project would not result in an airport or over-flight safety hazard for people residing or working in the project area.

Data contained in the Monterey County Geographic Information System (Source: IX.2) indicates that the Morgenrath property, and much of the surrounding area, is designated as a "Very High" State Responsibility Fire Hazard Zone. The Proposed Project plans (Source: IX.1) include a Landscape and Fuel Management Plan. Implementation of this plan is intended to create a defensible space around all structures and thinning of vegetation and restoration using fire-wise landscaping. Fuel modification and management of vegetation would increase the likelihood that the proposed structures survive wildfires. As previously analyzed, all development would be subject to the Monterey County Fire Code. No aspect of the Proposed Project increases the likelihood of exposing people or structures to a significant risk of loss, injury or death involving wildland fires.

The Environmental Health Bureau (EHB) has reviewed the Project. Part of EHB's review includes determining whether or not the Morgenrath property is included on the California Department of Toxic Substances Control's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). There are 3 active sites/facilities within Monterey County, none of which are on the Morgenrath property or within its vicinity. Therefore, the Proposed Project would not have the potential to create a significant hazard to the public or the environment relative to Government Code Section 65962.5.

Therefore, based on the above discussion, no additional environmental analysis is required.

9. HYDROLOGY AND WATER QUALITY **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒

9. HYDROLOGY AND WATER QUALITY **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
The Morgenrath property is a vacant parcel and the proposed site improvements would result in the conversion of pervious surfaces into impervious surfaces and converting a test well (see Planning File No. PLN170051) into a permanent well to provide potable water to the site. The project has been reviewed by the Water Resources Agency and HCD-Environmental Services for project consistency with Monterey County regulations for development within the floodplain, grading activities, and erosion control.

Prior Environmental Analysis
The prior environmental analysis concluded that the Original Project would not have the potential to result in substantial degradation of water quality, would not result in placing structures within a flood hazard area or impeded or redirect flood flows, and would not be subject to tsunamis, seiches or mudflows due to siting, elevation and the property's underlying soils. The 2019 IS/MND found that the Original Project would result in 2,460 square feet of new structural coverage and driveway improvements that would require compaction of soils. Such

improvements were determined to have the potential to incrementally reduce groundwater recharge, alter the existing site drainage patterns, and contribute to existing runoff in the area. Implementation and adherence to Monterey County Code and a standard condition of approval, relating to grading best management practices and erosion control measures, reduced this potential impact to a level of less than significant (Source: IX.13).

Impact Analysis

9(a), (b), (c), (d), (e), (f), (g), (h), (i), and (j). Conclusion: No New Impact.

Compared to the Original Project's ground disturbance, the Proposed Project would reduce the required grading quantities by 300 cubic yards and eliminates the new driveway from Highway 1. The Proposed Project would result in 2,458 square feet of impervious coverage, 2 square feet less than previously considered. The Monterey County Geographic Information System (Source: IX.2) and review by the Water Resources Agency demonstrates that the subject Property is not located within a 100-year flood hazard area or identified to be down-stream from a levee or dam. The Morgenrath property is located approximately 2 miles from the coast and is at 180 feet above mean sea level at its lowest point (Source: IX.16). In addition, there are no lakes within the vicinity of the site. As discussed in Section VI.6 – Geology and Soils, of this Supplemental Initial Study, the Proposed Project would not result in any new impacts to geology and soils. Therefore, and in comparison, to the analysis provided in the 2019 IS/MND, the Proposed Project would result in reduced impacts relative to degradation of water quality and no new impacts relative to placement structures within a flood hazard area or impediment or redirection flood flows, and impacts from tsunamis, seiches or mudflows. Consistent with Monterey County Code Chapter 16.08 and 16.12, the Proposed Project shall incorporate erosion control and grading plans into the final construction plans. All plans shall be approved by HCD-Building Services and Environmental Services. As proposed, no additional environmental analysis is required to make the 2019 IS/MND adequate, relating to Hydrology and Water Quality.

10. LAND USE AND PLANNING **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Prior Environmental Analysis

The 2019 IS/MND found that the Original Project would not result in impacts to land use and planning, relative to physically dividing an established community or conflicting with an applicable land use plan or habitat/natural community conversation plan (Source: IX.13).

Impact Analysis

10(a), (b) and (c). Conclusion: No New Impact.

The Proposed Project continues to include relocation of a commercial operation with an established long term continue use from one property (APN 419-201-006-000) to the adjacent subject property (APN 419-201-007-000). The commercial operation as considered in the 2019 IS/MND and as revised and discussed in this Supplemental IS/MND is an allowed use in the Visitor Serving Commercial (Coastal Zone) zoning district, subject to the granting of a General Development Plan and Combined Development Permit. The findings to support a General Development Plan to allow the establishment of a commercial business operation, convert a test well into a permanent well, construction of a 760 square foot office with a second story employee housing unit, 600 square foot workshop with a 300 square foot canopy, 800 square foot storage building and associated site improvements have been made. Additionally, the findings to support Coastal Development Permits to allow development on slopes in excess of 30%, within 100 feet of ESHA and removal of 11 native trees have been made. As discussed in Section VI.1 of this Supplemental initial study, the proposed EV charging stations and parking stall striping adjacent to Highway 1 would have a less than significant new impact on the Critical Viewshed of the Big Sur Coast Land Use Plan and Coastal Implementation Plan. No habitat conservation plan or natural community conservation plan has been adopted for the project area. No aspect of the Project would result in conditions which would physically divide an established community or conflict with an applicable land use plan or habitat/natural community conversation plan. Therefore, no additional environmental review is required.

11. MINERAL RESOURCES **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (Reference: 1, 3, 6 & 8)	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (Reference: 1, 3, 6 & 8)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Prior Environmental Analysis

The 2019 IS/MND concluded that implementation of the Original Project would have no impact on mineral resources as no mineral resources on the subject property (Source: IX.13).

Impact Analysis

10(a), (b) and (c). Conclusion: No New Impact.

No mineral resource has been identified on the subject property and no local general plan or land use plan designates this area as containing mineral resources. Therefore, the Proposed Project would not result in the loss of valuable or locally mineral resources and no additional environmental analysis is required (Source: IX.1, 2, 3 and 6).

12. NOISE **Would the project result in:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
The Morgenrath property is located in an area with visitor serving commercial properties to the south and residential properties to the north (Source: IX.2). The primary noise contributor is produced by vehicular traffic on Highway 1. Secondary noise contributors are produced by entertainment activities associated with the visitor/commercial uses and the Blaze Engineering operations that occurred on the adjacent property (Assessor's Parcel Number 419-201-006-000) where there are sensitive noise receptors are established (Source: IX.2 and IX.6). Because the baseline noise conditions include the spatial and functional conditions of the area at the time the application for the Project was made, the operational components of the project would result in no change to existing noise levels in the area.

Prior Environmental Analysis
The 2019 IS/MND concluded that there would be no impact relative to the increase in ambient noise levels and exposing people to excessive noise levels. This was due to the determination the subject property is not located within the vicinity or approved airport land use plan and that

relocating an existing operation from the former Blaze site to the Morgenrath property would result in relocating the main noise producers of the operations, large vehicles and the cement silo, further away from existing single-family dwellings and move them closer to Highway 1. The prior environmental analysis also determined that the Original Project would result in a less than significant impact relative to the exposure of persons to or generation of excessive (temporary or permanent) groundborne vibrations or ground borne noise levels which are in excess of the adopted local noise ordinance or land use plan as noise levels produced during construction activities would be temporary and typical of noise levels generated for development of this scale (Source: IX.13)

Impact Analysis

12(a), (b), (c), (d), (e), and (f). Conclusion: No New Impact.

Data contained in the Monterey County Geographic Information System (IX. GIS) confirms that the Morgenrath property is not within an area subject to an airport land use plan, within 2 miles of an airport, or within the vicinity of a private airstrip. No aspect of the Proposed Project would result in exposing people residing or working in the area to excessive noise levels associated with airports. The Proposed Project removes the cement silo use previously proposed in the Original Project and therefore would reduce the Project's ability to generate ambient noise or groundborne vibrations (Source: IX.1). Other operational activities, including the relocation of the use to the subject property and use of large vehicles, as analyzed in the prior environmental document, would not generate permanent ambient noise levels in the project vicinity which exceed baseline conditions and therefore will not expose people to excessive groundborne vibrations or ground borne noise levels (Source: IX.13). As detailed in the General Development Plan (Source: IX.1), hours of operation would be Monday through Friday from 8:00am to 4:30pm and therefore would not exceed Monterey County's adopted Noise Ordinance (Chapter 10.60) or applicable land use policies. Construction of the proposed second story employee housing unit would not generate additional noise or vibrations not analyzed under the 2019 IS/MND as they would be typical of noise levels generated during residential construction activities and similar to other construction activities occurring on the property. The Proposed Project removed construction and grading associated with a new driveway from Highway 1 and therefore reduces Project's potential to generate excessive ground vibrations. No additional environmental analysis is required.

13. POPULATION AND HOUSING **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

13. POPULATION AND HOUSING Would the project:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Prior Environmental Analysis
The 2019 IS/MND found that because the Original Project did not propose any residential development or changes to the intensity of Blaze Engineering (demand, employees, etc), there would be no impact relative to inducing a substantial population growth or displacing of substantial numbers of people or existing housing (Source: IX.13).

Impact Analysis
13(a), (b), and (c). Conclusion: No New Impact.
Implementation of the Proposed Project would establish a commercial operation on a commercially zoned parcel (Source: IX.2). As previously analyzed, implementation of the Proposed Project and General Development Plan would continue to relocate the former Blaze Engineering operation on an adjacent property to the subject property (Source: IX.13). Scale of operations under the Proposed Project have decreased as storage of aggregate materials is no longer proposed (Source: IX.1 and IX.13). Although the Proposed Project would include the construction of a second story 760 square foot employee housing unit to house up to two employees, no new impact relative to population and housing would result from implementation of the Proposed Project. The subject property is vacant and therefore no existing housing units will be displaced, and the housing of up to two employees does not constitute a substantial increase in population growth, directly or indirectly. According to the Applicant, the employees to be housed would likely relocate from either the Big Sur area or the Monterey Peninsula to the proposed unit (Source: IX.6). No aspect of the Proposed Project would increase the number of employees needed to operate Blaze Engineering on the subject property or allow for the expansion or intensification of the business operations. Therefore, there would be no additional impact relative to the displacement, alteration, distribution, or density of human population in the area in any way, or need for additional or replacement housing. No additional analysis is required.

14. PUBLIC SERVICES Would the project result in:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
Implementation of the Project would establish a commercial operation on a commercially zoned parcel. The operation would replace the former Blaze Engineering operation on an adjacent property.

Prior Environmental Review
The 2019 IS/MND found that the Original Project would result in no impacts to public services as there would be no change in the number of employees resulting from the relocation, the relocated business would be of the same scale and square footage as the existing business site and would not in itself allow an expansion or intensification of the business operations. The Original Project did not require new, or cause a physical alteration of existing, governmental facilities (resulting in construction that would cause significant environmental impacts) in order to maintain acceptable service ratios, response times or other performance objectives for public services (Source: IX.13).

Impact Analysis:
14(a), (b), (c), (d), and (e): No New Impact
Proposed Project would not result in the need for additional employees. The scale of business operations would be reduced as storage of aggregate and operation of a cement silo is no longer proposed and therefore, no expansion or intensification of the business operation would be permitted under the proposed General Development Plan. No aspect of the Proposed Project would require new, or cause a physical alteration of existing, governmental facilities (resulting in construction that would cause significant environmental impacts) in order to maintain acceptable service ratios, response times or other performance objectives for public services (Source: IX.1, 2, 3 and 4). Therefore, the Proposed Project would result in no new impacts and no additional analysis is required.

15. RECREATION Would the project:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
Implementation of the Project would establish a commercial operation on a commercially zoned parcel. The operation would replace the former Blaze Engineering operation on an adjacent property.

Prior Environmental Review
The 2019 IS/MND determined that the because the Original Project did not propose additional employees or an intensification of business operations, there would be no impact relative to the increase in use of existing neighborhood and regional recreational facilities and increase the construction or expansion of recreational facilities (Source: IX.13)

Project Analysis
15(a) and (b): No New Impact
The Proposed Project would not require services of additional employees and a reduced business operation is proposed (Source: IX.1 and IX.6). No aspect of the project alters the conclusion of the 2019 IS/MND relative to Recreation. The Proposed Project would not result in a significant increase of the use of existing neighborhood and regional parks or other recreational facilities, causing substantial physical deterioration. The Proposed Project does not include or require construction or expansion of recreation facilities. The Project Project would not create significant recreational demands. No additional analysis is required.

16. TRANSPORTATION/TRAFFIC Would the project:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b) Conflict with the goals, objectives, and policies of the 2010 Regional Transportation Plan for Monterey County, including, but not limited to level of service standards and travel demand measures, or other standards established by the Transportation Agency for Monterey County (TAMC) for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
The Project is for the relocation of an existing operation from the former Blaze site to the Morgenrath property. This existing operation provided, and would continue to provide, construction contractor related services to the community and visitors.

Prior Environmental Analysis
The 2019 IS/MND concluded that the Original Project would not conflict with the 2010 Regional Transportation Plan for Monterey County or an applicable plan, ordinance or policy relating to the effectiveness for the performance of the circulation system. Additionally, the prior environmental analysis found that the Original Project would not change air traffic patterns or result in inadequate emergency access. This was due to the fact that the Original Project included relocating an existing operation from one property to another, and therefore the volume of traffic would not exceed the baseline condition nor impact the existing level of service in the area. Policy 4.1.3.A.4 of the Big Sur Coast Land Use Plan requires limiting of access road entrances off Highway 1 unless it can be demonstrated that the use of existing public or private roads is not

feasible. Section 20.145.130.B.6 of the Big Sur Coast Coastal Implementation Plan requires proposed developments that include the construction of a new entrance to Highway 1 to demonstrate an inability to use existing public roads to access Highway 1. Consistency with this policy and implementation of the regulation is intended to further the County's objective to maintain and enhance Highway 1's aesthetic beauty and to protect its primary function as a "recreational route." The Original Project proposed construction of a new driveway access approximately 60 feet south of the existing driveway access. The proposed drive was found to result in safer ingress and egress conditions due to a greater line of sight distance. The 2019 IS/MND also found that the Original Project would have a less than significant impact relative to substantially increasing hazards due to a design feature or incompatible uses (Source: IX.13). During the Big Sur Land Use Advisory Committee Meeting's review of the Original Project, a member of the public identified potential hazards resulting from the vehicular-pedestrian interface (Source: IX.18). Although the Apple Pie Ridge Road is an existing access way for multiple residences, and use of the road is consistent with its purpose, the Original Project would result in a slight increase of vehicular traffic – primarily commercial trucks and employee vehicles. The primary concern from the public was that school children walk on the road to get to and from school. To address these concerns of the neighbors, the applicant agreed to modify their plans to either create an informal walking path along the roadway and/or incorporate fencing to act as a barrier.

Project Analysis

16(a), (b), (c), (d), (e), and (f): No New Impact

The Proposed Project's General Development Plan (Source: IX.1) lists examples of services consist of grading, paving, installing water, septic, and electrical systems, and road building and repair. Blaze also provides heavy equiptment, fuel, and labor to the Big Sur area on an emergancy basis. The main component of the Original Project was to provide a home base for Blaze's operation with office hours Monday through Friday from 8:00am to 4:30pm, with on-call staff being available for emergency response. The Proposed Project removes the ability for memebrs of the public to pruchage construction and landscaping aggregate such as concrete, rock, sand, and plumbing and landscape supplies. This thereby reduces the generated trips of the business operation. The continued uses of the site, as previously analyzed, would be primarily for administrative, storage, and maintenance. Based on the goods and services Blaze provides, intensive construction activities would continue to occur off-site on their clients' property. In comparison to the 2019 IS/MND, the Proposed Project redcues the employee count by 8, for a total of 12 employees. ~~No changes to the employee count (20) analzyed in the 2019 IS/MND would occur.~~ Adequate employee parking would be provided in an area located adjacent to the office and shop, while parking of Blaze's large construction equiptment (trucks, trailers, dozers, ect.) would continue to occur within the existing flat dirt parking area adjacent to the new driveway (Source: IX.1 and IX.6).

As previously analyzed, because the Original Project includes relocating an existing operation from one property to another, the volume of traffic would not exceed the baseline condition nor impact the existing level of service in the area. The Porposed Project continues to require relocation of the existing operation. Additionally, the Proposed Project eliminates the new driveway component of the Original Project and retains the informal walking path along the roadway suggestion from the public to address pedestrian safety. The Proposed Project does not include uses that would require air transport on or off the Morgenrath property. Therefore, the

Proposed Project would be consistent with the goals and policies of the BSC LUP for circulation, roadway level of service, air traffic patterns, emergency access or alternative modes of transportation and result in no new impact (Source: IX. 1, 2, and 6).

Due to the Proposed Project's proposal of two electric vehicle changing station, a trip generation assessment was required by HCD-Engineering Services. The project specific Traffic Report (LIB220326), prepared by Central Coast Transportation Consulting dated November 21, 2022, analyzed the trip generation estimate associated with relocating a commercial business from an adjacent parcel, construction of a two-bedroom employee housing unit, and providing six public parking spaces, two of which containing electric vehicle (EV) charging stations (Source: IX.19). Trip generation estimates for the office, workshop, and storage building were categorized as a small office building using rates from the Institute of Transportation Engineers (ITE), while the employee housing unit was evaluated as a single-family residence. The Traffic Report notes that these assumptions are conservative overestimates since the on-site residents will also be employees. ITE does not provide standard trip generation rates for EV charging stations, so the Traffic Report based the associated trip generation on the operational characteristics. Level 2 charging stations, such as the ones proposed, typically produce between 3.6 kW- 7.2 kW, which results in an estimated range of 10-23 miles per hour of charging. Currently, the nearest public EV charging station is in Carmel, roughly 26 miles north of the project site (Source: IX.19). It would be necessary for an EV to charge for over an hour to gain enough range to reach Carmel, which makes it unlikely that any vehicle would travel to Big Sur solely to utilize one of the proposed Level 2 EV charging stations. As a worst-case estimate, both EV charging stations were assumed to fully turn over once during a single hour (e.g. two vehicles arrive and depart each charge station during the peak hour). However, it is more likely that when in use, the EV drivers would charge for more time, resulting in fewer trips. The office, workshop, storage building (2,~~1~~458 total square feet) would generate approximately 31 daily trips per day, with 4 being in the AM peak hour and 5 in the PM peak hour. Since the project would include relocation of an existing business from one property to the subject property and no expansion of business operations is proposed, the estimated 31 daily trips associated with the business are assumed to already exist on Highway 1 and local road networks. As such, 31 daily trips are a conservative estimate. The proposed second story employee housing unit would generate approximately 10 daily trips, with 1 trip in the AM peak hour and 1 trip in the PM peak hour. As described above, the 10 daily trips are a conservative overestimate as it assumes the employee housing unit would be operating as a standard single-family dwelling. As employee housing, the occupants would reside and work on the Morgenrath property, thereby reducing the majority of trips. The EV charging stations are assumed to generate 18 daily trips, with 4 trips in the AM and PM peak hours. ITE Trip Generation data for gas stations show that 42 percent of trips are 'pass-by' trips from vehicles already on the roadway network. Central Coast Transportation Consulting presumes that the pass-by trips for the proposed EV chargers would be higher than gas stations at this location given the relatively remote location and slow charge rates (Source: IX.19). A pass by reduction was not applied to the estimated 18 daily trips of the EV chargers, and therefore assumed to be a conservative overestimate. Per Office of Planning and Research guidance, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact. The Traffic Report confirms staff's 2019 IS/MND analysis that relocation of an existing commercial business would not generate additional trips when compared to baseline conditions and finds that the proposed EV chargers would have an

insignificant impact on the local roadways. Therefore, the Proposed Project would not result in any additional impact not analyzed in the 2019 IS/MND and no additional analysis is provided.

17. TRIBAL CULTURAL RESOURCES **Would the project:**	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New 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	☐	☐	☐	☒
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.	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
As discussed in Section VI.5 – Cultural Resources of this Initial Study, Monterey County Geographic Information System (GIS) (Source: IX.1) indicates that the Morgenrath property is located within an area of moderate archaeological sensitivity. Through continuous discussions with Tribal representatives and background information contained in the archaeological report, locations such as the coast and/or areas containing, or used to contain, a water source, have been known to provide occupation, gathering, and processing sites for Native Americans. The Big Sur River is approximately 500-feet west of the site and Pheneger Creek, a tributary to the Big Sur River, is approximately 150-feet to the south (Source: IX.16).

Prior Environmental Analysis
In accordance with Section 20.145.120.B.1.b of the Big Sur Coastal Implementation Plan, an archaeological survey report, Preliminary Archaeological Assessment, was prepared and submitted for the Original Project (Source: IX.8). The 2019 IS/MND found that the Original Project would have no impact to a historical resource defined in in Public Resources Code section 5020.1(k) because the closest site was over 2 miles northwest of the subject property. In accordance with Section 21080.3.1 of the Public Resources Code, non-exempt projects subject to environmental review shall request a Tribal Consultation to determine if potential impacts to tribal cultural resources exist. On June 19, 2018, HCD-Planning staff consulted with the OCEN tribe. As documented in the OCEN formal response letter, dated June 18, 2018, HCD-Planning staff was notified that the primary priority of OCEN is to protect their ancestor's remains

through avoiding disturbance and that the site be preserved and/or all cultural and sacred items be left with their ancestors onsite or where they were discovered. OCEN tribe considered the Morgenrath property to potentially contain cultural tribal resources and recommended that tribal monitoring occur for ground disturbance (Source: IX.15). Although the Preliminary Archaeological Assessment found no evidence of native American remains or anything of archaeological or historical significance, the 2019 IS/MND determined that the Original Project would have a less than significant impact to tribal cultural resource, provided one mitigation measure was implemented.

CR & TCR – Mitigation Measure No. 5 Excavation for the septic tank, as shown on the preliminary Site Plan (Sheet No. A1.1), shall be observed by a Native American Tribal Monitor for the Ohlone/Costanoan-Esselen Nation (OCEN), as approved by the OCEN Tribal Council. This monitoring shall be limited to the areas specified above and to excavation of sterile soils. Placement of fill and/or compaction of soils shall not require a tribal monitor. If more than one earth moving equipment is deployed at different locations at the same time, more than one tribal monitor shall be present during those periods. If at any time, potentially significant cultural resources, sacred places, or intact features are discovered, the contractor shall temporarily halt work until the find can be evaluated by the tribal monitor and archaeological monitor. If the find is determined to be significant, work shall remain halted until mitigation measures have been formulated, with the concurrence of RMA-Planning, and implemented. Since any items that may be uncovered during excavation belong to the property owner, this mitigation shall serve as notice that the OCEN Tribal Council formally requests that any sacred burial items discovered be given to the tribe by the property owner.

Project Analysis
17(a.i and a.ii): No New Impact
CR & TCR – Mitigation Measure No. 5 is still adequate; however, revisions are needed to allow tribal monitoring to be completed by any tribe traditionally and culturally affiliated with the vicinity of the subject parcel, or other appropriately NAHC-recognized representative, rather than just OCEN. Additionally, due to the addition of BIO-Mitigation Measure Nos. 5 and 6, CR & TCR – Mitigation Measures No. 5 would be renamed and applied to the Proposed Project as Mitigation Measure No. 7. The Proposed Project reduces overall site disturbance by over 300 cubic yards and the septic system location previously analyzed is unchanged (Source: IX.1 and IX.13). No aspect of the Proposed Project would increase the potential to result in impacts to tribal resources. No historical resource not discussed in the 2019 IS/MND has been identified

and therefore the project will continue to have no impact to resources defined in Public Resources Code section 5020.1(k). No additional analysis is required.

CR & TCR – Mitigation Measure No. 7 (Revised*):* *Protection of Cultural Resources and Sacred Places***.** In order to reduce potential impacts to cultural resources and sacred places, excavation for the the septic tank, as shown on the preliminary Site Plan (Sheet No. A1.1), shall be observed by a Native American Tribal Monitor approved by the tribe traditionally and culturally affiliated with the vicinity of the subject parcel, or other appropriately NAHC-recognized representative ~~for the Ohlone/Costanoan-Esselen Nation (OCEN), as approved by the OCEN Tribal Council~~. This monitoring shall be limited to the areas specified above and to excavation of sterile soils. Placement of fill and/or compaction of soils shall not require a tribal monitor. If more than one earth moving equipment is deployed at different locations at the same time, more than one tribal monitor shall be present during those periods. If at any time, potentially significant cultural resources, sacred places, or intact features are discovered, the contractor shall temporarily halt work until the find can be evaluated by the tribal monitor and archaeological monitor. If the find is determined to be significant, work shall remain halted until mitigation measures have been formulated, with the concurrence of HCD-Planning, and implemented. Since any items that may be uncovered during excavation belong to the property owner, this mitigation shall serve as notice that the OCEN Tribal Council formally requests that any sacred burial items discovered be given to the tribe by the property owner. (HCD-Planning)

> **Mitigation Monitoring Action No. 7a**: Prior to issuance of construction permits for grading or building, the owner/applicant shall include a note on the construction plans encompassing the language contained in Mitigation Measure No. ~~5~~7. The owner/applicant shall submit said plans to HCD-Planning for review and approval.
>
> **Mitigation Monitoring Action No. 7b**: Prior to issuance of construction permits for grading or building, the owner/applicant shall submit a contract with a monitor approved by the tribe traditionally and culturally affiliated with the vicinity of the subject parcel, or other appropriately NAHC-recognized representative ~~an OCEN approved Native American Tribal Monitor~~ to HCD-Planning for review and approval. The contract shall outline logistics for monitoring during earth disturbance activities specified in Mitigation Measure No. ~~5~~7 as well as how uncovered cultural resources will be handled, in coordination with the project archaeologist.
>
> **Mitigation Monitoring Action No. 7c:** An on-site preconstruction meeting shall be held between the applicant, ~~OCEN~~ the Native American Tribal Monitor, and contractor to discuss and assure understanding of Mitigation Measure No. ~~5~~7 and scheduling of construction with regard to monitoring. Prior to issuance of any construction permits for grading or construction, the preconstruction meeting between the parties shall be conducted and a letter summarizing what was discussed shall be submitted to HCD-Planning.
>
> **Mitigation Monitoring Action No. 7d:** During earth disturbance activities specified in Mitigation Measure No. ~~5~~7, the ~~OCEN approved~~ Native American Tribal Monitor shall be onsite observing the work, consistent with the approved contract required by Mitigation Measure Action No. ~~5~~7b. Prior to final of construction permits for grading or

building, the owner/applicant shall submit a letter ~~for~~ prepared by the Native American Tribal Monitor verifying all work was done consistent with the contract to HCD-Planning.

18. UTILITIES AND SERVICE SYSTEMS Would the project:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste? (Reference: 1)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

Prior Environmental Analysis

Implementation of the Original Project would require the installation of an onsite wastewater treatment system, allow conversion of a test well (approved by File No. PLN170051, Resolution No. 17-006) to a permanent well to provide domestic water service, and require creation of an onsite stormwater drainage facility. It was disclosed that any excess construction materials would be hauled on Highway 1 to the landfill outside of the City of Marina, operated by the Monterey Regional Waste Management District, and that the minimal amount of waste produced by the Project would not affect the permitted landfill capacity. The 2019 IS/MND concluded that Original Project would have no impact relative to exceeding wastewater treatment requirements of the applicable Regional Water Quality Control Board or causing a significant environmental

effect due to the construction of new or expanded wastewater treatment facilities and storm water drainage facilities. Additionally, the prior environmental analysis found that due to the proposed on-site utilities, connection to a public wastewater, stormwater, or water facility was not required (Source: IX.13).

Impact Analysis

18(a), (b), (c), (d), (e), (f) and (g): No New Impact

The prior environmental analysis remains adequate as the Proposed Project would also not require connection to a public wastewater, stormwater, or water facility, and because the Monterey Regional Waste Management District landfill continues to have the capacity to hold the minimal amounts of waste produced during the construction phase of the project. The Monterey County Environmental Health Bureau has reviewed the Proposed Project and determined that the proposed septic system and conversion of the test well to a domestic well have the capacity to serve Blaze Engineering operations and the proposed two-bedroom employee housing unit (Source: IX.1 and IX.11). No additional analysis required.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	New Potentially Significant Impact	Less than Significant with New Mitigation Required	Less than Significant New Impact	No New Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Source: IX.1, 2, 3, 4, 5, 6, 7,8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19 and 20)	☐	☒	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? (Source: IX.1, 2, 3, 4, 5, 6, 7,8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19 and 20)	☐	☐	☐	☒
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (Source: IX.1, 2, 3, 4, 5, 6, 7,8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19 and 20)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
Pursuant to Section 21083 of the Public Resources Code and Section 15065 of the CEQA Guidelines, a project would be considered to have a significant effect on the environment, and an Environmental Impact Report shall be prepared, if impacts identified cannot be avoided or mitigated to a point where no significant effect on the environment would occur. Analysis provided in this Supplemental Initial Study found that there is no substantial evidence, in light of the whole record, that the Project may have a significant effect on the environment.

(a). Conclusion: Less Than Significant Impact with New Mitigation.
Based upon the analysis conducted for this Supplemental Initial Study, the Proposed Project would have no new impacts to agriculture and forest resources (see Section VI.2) and cultural resources (see Section VI.5). The standard condition of approval applied to the Original Project which requires work to be halted if cultural resources are accidently uncovered during excavation would also be applied to the Proposed Project and therefore would not result in a new impact. The 2019 IS/MND included four biological mitigation measures to address potentially significant impacts to special natural communities that are considered to be environmentally sensitive habitat areas (see Section VI.4 – Biological Resources). Mitigation Measures Nos. 1 through 4 required biological monitoring, tree protection, and approval of a final Construction Management Plan and Restoration and Fuel Management Plan. The 2019 IS/MND found that implementation of these mitigations would reduce potential impacts to biological resources to a less than significant level. Mitigation Measure No. 1, as detailed in the 2019 IS/MND, and in conjunction with Mitigation Measure Nos. 2 and 3, would reduce potential impacts to the project site's Redwood Forest community to a level of less than significant. Although the Proposed Project includes removal of five fewer trees than analyzed in the prior environmental analysis, modifications to Mitigation Measure No. 2 (Tree Protection) are needed to accurately reflect the Proposed Project and make the 2019 IS/MND analysis adequately apply. Although Mitigation Measure Nos. 1 through 4 would be applicable to the Proposed Project as impacts to the project site's Redwood Forest community are unchanged and potentially reduced, the project biologist identified a potential impact to wildlife species of special concern which was not previously analyzed. Therefore, Mitigation Measure Nos. 5 and 6 would be applied to reduce new impacts to a level less than significant. The Project would not result in a new impact to tribal cultural resources (see Section VI.17). Due to additional incorporation of additional biological mitigation measures, Mitigation Measure No. 5 of the 2019 IS/MND would be renamed and applied to the Proposed Project as Mitigation No. 7 and would be adequate for the Proposed Project to ensure impacts to tribal resources are less than significant. (Source: IX.13).

(b). Conclusion: No New Impact.
As analyzed in the 2019 IS/MND, there would be no change in baseline relative to the spatial and functional conditions of the surrounding area at the time the application for the Project was made because the Original Project included relocation of an existing operation from the former Blaze site to the Morgenrath property. Temporary changes would occur as a result of construction activities, but the establishment of the use and the ongoing operational impacts of the Original Project would not be cumulatively considerable. Scope analyzed in the 2019 IS/MND remains stable with the Proposed Project as relocation of Blaze Engineering from a former site to the subject property is still proposed. No additional analysis is required.

(c). Conclusion: No New Impact.

The 2019 IS/MND found that the Original Project would have no impacts to land use and planning, mineral resources, population and housing, public services, recreation, and utility and service systems, and potential impacts to aesthetics, air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, and noise. The Original Project included standard conditions of approval which would result in reducing these impacts to a less than significant level. Additionally, the 2019 IS/MND determined that the Original Project would have a less than significant impact the potential to impact humans by increasing traffic hazards due to increasing the vehicular-pedestrian interface on an existing rural roadway. However, this potential impact does not rise to a level that would require mitigation. A non-standard condition of approval was incorporated to ensure the Original Project's final plans included a pedestrian path, as recommended by the general public. Based upon the analysis conducted for this Supplemental Initial Study, the Proposed Project will result in no new impact to land use and planning, mineral resources, population and housing, public services, recreation, and utility and service systems, air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, and noise. The Proposed Project includes installation of two electrical vehicle charging stations along Highway 1, in an area currently used by the public for parking. The proposed charging stations would result in a new less than significant impact with implementation of a non-standard Condition of Approval requiring exterior modifications to reduce visible from the public right of way. In the aggregate, the Proposed Project will not result in environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly, not analyzed in the 2019 IS/MND.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

III. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

The State Legislature, through the enactment of Senate Bill (SB) 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a "de minimis" (minimal) effect on fish and wildlife resources under the jurisdiction of the California Department of Fish and Wildlife. Projects that were determined to have a "de minimis" effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of "de minimis" effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the California Department of Fish and Wildlife determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of "no effect" on fish and wildlife resources, development applicants must submit a form requesting such determination to the California Department of

Fish and Wildlife. A No Effect Determination form may be obtained by contacting the Department by telephone at (916) 653-4875 or through the Department's website at www.wildlife.ca.gov.

Conclusion: The project will be required to pay the fee.

Evidence: Based on the record as a whole as embodied in the HCD-Planning files pertaining to PLN160851 and PLN160851-AMD1, and the above Supplemental Initial Study / Proposed Mitigated Negative Declaration.

IX. REFERENCES

1. Project Application, Plans, and Proposed General Development Plan
2. Monterey County Geographic Information System (GIS)
3. 1982 Monterey County General Plan & Big Sur Coast Land Use Plan
4. Big Sur Coastal Implementation Plan, Part 3
5. Title 20 of the Monterey County Code (Zoning Ordinance), Part 1 of the Coastal Implementation Plan
6. Site Visit conducted by the project planner on January 6, 2023
7. "Tree Resource Evaluation Project Impact Analysis", dated October 6, 2017 (Monterey County Document No. LIB170437), prepared by Maureen Hamb-WCISA, Santa Cruz, CA
8. "Preliminary Archaeological Assessment", dated February 17, 2018 (Monterey County Document No. LIB170438), prepared by Gary S. Breschini, Ph. D., Salinas, CA
9. "Biological Assessment", dated October 23, 2017 (Monterey County Document No. LIB170439), prepared by Fred Ballerini, Pacific Grove, CA, and "Supplemental Biological Assessment" reports dated March 26, 2020 and September 6 2022.
10. "Geotechnical Report", dated February 2017, (Monterey County Document No. LIB170440), prepared by Grice Engineering, Inc., Salinas, CA
11. "Percolation Testing Results", dated November 27, 2017 (Monterey County Document No. LIB170441), prepared by Haro, Kasunich and Associates, Inc., Watsonville, CA
12. "Geologic Report", dated June 22, 1993 (Monterey County Document No. LIB170052), prepared by Karl Vonder Linden, Menlo Park, CA
13. "Initial Study/Mitigated Negative Declaration" (SCH. No. 2018091005), dated September 26, 2017, prepared by Anna Quenga, Associate Planner, Monterey County Housing and Community Development, Salinas, CA.
14. CEQA Air Quality Guidelines, Monterey Bay Unified Air Pollution Control District, Revised February 2008
15. Tribal Consultation Letter received from The Ohlone/Costanoan-Esselen Nation, dated June 18, 2018
16. Google Earth Imagery dated February 4, 2018 36º16'11.56" N 121º48'25.62" W, Elevation at 165ft., Eye Alt. 1445ft.
17. Big Sur Coast Highway Management Plan, Caltrans District 5, March 2004
18. Big Sur Land Use Advisory Committee Minutes for Meeting Dated January 23, 2018
19. "Traffic Memorandum (Trip Generation Estimation)", dated November 21, 2022 (Monterey County Document No. LIB220362), prepared by Korinne Tarien and Joe Fernandez, Central Coast Transportation Consulting, Morro Bay, CA.

20. The 2012-2015 Air Quality Management Plan (AQMP), including the 1991 AQMP and the 2009-2011 Triennial Plan Revision.

21. "Morgenrath Blaze Engineering PLN160851 - Request for Comments", dated March 30, 2023, prepared by Julie Vance, Central Regional Manager, California Department of Fish and Wildlife, Fresno, CA.