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Appendices

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1 Introduction and Purpose

The Monterey County Office of Education (MCOE) is the lead agency consistent with the California Environmental Quality Act (CEQA) (Public Resources Code sections 21000 et seq,) and the CEQA Guidelines (California Code of Regulations, Title 14, §§ 15000, et seq.) for preparation of this Addendum to the New Community School 2014 Final Mitigated Negative Declaration (Addendum). The 2014 Mitigated Negative Declaration (MND) evaluated the potential environmental effects of the New Community School project and was adopted by the Monterey County Board of Education on July 16, 2014. The New Community School MND and this Addendum are available at the MCOE Office located at 901 Blanco Circle, Salinas, CA 93901 and on the MOCE's website at https://www.montereycoe.org/. This Addendum incorporates revisions to the New Community School project description and requisite environmental analysis. The revision incorporates a change in the previously approved project to include the cleanup and haul away associated with the proposed remediation action of the project site.

The purpose of the Addendum is to make additional changes to the adopted MND necessary to complete environmental documentation related to the project revisions pursuant to Public Resources Code sections 21000 et seq., inclusive of the CEQA Guidelines.

Section 15164(b) of the CEQA Guidelines states that,

> "An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling of the preparation of a subsequent EIR or negative declaration have occurred."

An addendum does not need to be circulated for public review but can be included in or attached to the final Environmental Impact Report (EIR) or adopted Negative Declaration prior to deciding on the project.

This Addendum describes the proposed revisions to the adopted New Community School MND. For each proposed revision in the Addendum, an explanation supports the findings that these revisions to the project will not result in a substantial change as described in the CEQA Guidelines Section 15162(a) which requires that when an EIR has been certified or a Negative Declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project that require major revisions of the previous EIR or Negative Declaration due to involvement of new significant environmental effects or a substantial increase in severity of previously identified significant effects;
2. Substantial changes have occurred with respect to circumstances under which the project is undertaken that will require major revisions of the previous EIR or Negative Declaration due to involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and,
3. New information of substantial importance, which was not known and could not have been known with exercise of reasonable diligence at the time the previous EIR or Negative Declaration was adopted, shows any of the following:

A. That the project will have one or more significant effects not discussed in the previous Negative Declaration;

B. Significant effects previously examined will be substantially more severe than identified in the previous EIR;

C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternative; or

D. Mitigation Measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Therefore, this Addendum analyzes the revised project as required by the CEQA Guidelines, Sections 15162 and 15164. As set forth in this Addendum, the proposed changes to the project are minor and none of the conditions described above will occur that require preparation of a subsequent Negative Declaration in relation to the New Community School project. Therefore, an addendum is appropriate for the project. This document describes the impacts associated with the project site cleanup and haul away.

2 Project Description

The 2014 MND for the New Community School Project (Project) was adopted on July 16, 2014 by the Monterey County Board of Education as the appropriate CEQA environmental review for the project. The project site is located on 1.97 acres of land located at 615 Leslie Drive, Salinas, Monterey County, California. The project is planned to serve a master plan capacity of 150 high school age students and 15 school staff members.

Since adoption of the 2014 MND, the Project has been amended to include the cleanup of the site to remove potentially hazardous materials. Site cleanup and haul away would be completed in 20 working days and would require the operation of one trencher, two excavators, one tractor/loader/backhoe, one dumper/tender, and one water truck. This Addendum evaluates the site cleanup and haul away of the excavated 1,200 cubic yards of soil and provides analysis of the resource topics included in the 2014 MND and the resource topics that have been added to the Appendix G CEQA Checklist since the adoption of the 2014 MND.

3 CEQA Addendum Environmental Analysis

This Addendum addresses the revised project's effects related to the environmental topics and mitigation measures addressed in the 2014 New Community School MND. The baseline for review is the adopted MND impacts and mitigation as described in the adopted MND.

4 Determining Significance

The criteria for determining the significance of environmental impacts in this Addendum are the same as those contained in the 2014 New Community School MND. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions:

The explanation of each environmental 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 significant.

The Initial Study uses a checklist format consistent with the CEQA Guidelines that contains questions concerning potential changes to the environment that may result if this project is implemented. The following terminology is used to describe the potential level of significance of impacts:

- Significant: Known substantial environmental impacts. Further review needed to determine if there are feasible mitigation measures and/or alternatives to reduce the impact.
- Potentially Significant, Unknown: Potentially significant impacts that need further review to determine significance level and whether mitigable.
- Potentially Significant, Mitigable: Potentially significant impacts that can be avoided or reduced to less-than-significant levels with identified mitigation measures agreed-to by the applicant.
- Less than Significant: Impacts that are not substantial or significant.
- Beneficial Impact: Impacts would improve environmental conditions.
- No Impact: Project would not cause any impact.

4.1.1 Environmental Impact Analysis

Pursuant to CEQA, an addendum is the appropriate environmental document for analyzing a project revision if only minor technical changes or additions to the analysis are necessary or none of the conditions calling for the preparation of a subsequent EIR or Negative Declaration have occurred. From an environmental perspective, the Lead Agency must demonstrate the following with respect to that revised project:

- That the revised project will not have one or more significant effects not discussed in the previous MND;
- That the revised project would not create effects that result in an increase of the severity of significant effects already identified in the previous MND;
- That all feasible mitigation measures are accepted and adopted; and
- That no additional mitigation measures are required to reduce one or more significant effect or, if these are required, that they are imposed as part of the environmental assessment.

This Addendum is an environmental analysis for the revised project described in Section 2.0 Project Description.

5 Potential Environmental Impacts of the Revised Project

This section addresses each of the environmental issues discussed in the 2014 MND Environmental Checklist to determine whether or not the revised project has the potential to create new significant impacts or a substantial increase in the significance of a significant impact as compared to what was identified in the 2014 MND, within the framework of CEQA Guidelines Sections 15162 and 15164.

5.1.1 Aesthetics

Issues associated with visual aesthetics examined in the 2014 MND include the potential blockage of important public scenic views, project on-site visual aesthetics, compatibility with the surrounding area, and changes in exterior lighting.

Overall implementation of the project would have a less-than-significant impact on aesthetics in the area.

Impacts Analysis

The revised project will not affect a scenic vista, will not affect scenic resources within a designated or scenic highway, will not substantially degrade the existing visual character, nor will the project introduce a new source of light or glare.

The revised project would involve site cleanup and haul away activities and would not alter the aesthetics of the proposed structures evaluated in the 2014 MND. The revised project involves the cleanup of the project site and would temporarily introduce construction equipment on the project site. The proposed site cleanup would temporarily introduce construction equipment similar to the construction phase of the project evaluated in the 2014 MND. The revised project would not modify the design, layout, or aesthetic of the proposed structures. Therefore, similar to the project, the revised project will not result in any new significant aesthetics resources impacts requiring mitigation.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.2 Agriculture and Forest Resources

The revised project would not alter the 2014 MND findings that no agricultural or forestry land is present within or in the vicinity of the project site and that the project would have no impact to agricultural and forestry resources.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.3 Air Quality

The 2014 MND indicated that the project is located in the North Central Coast Air Basin (NCCAB) and within the jurisdiction of the Monterey Bay Unified Air Pollution Control District (MBUAPCD). In 2014 the SJVAPCD was in nonattainment for the State ozone standard and State PM_{10} standards for particulate matter (annual and 24-hour) and designated "attainment" for State $PM_{2.5}$ (24-hour) standards. Construction activities associated with the project would result in short-term increases in particulate matter and ozone precursor emissions. Implementation of MM-1, which requires standard construction measures such as watering exposed surfaces, covering hauled materials, minimizing vehicle speeds and idling times, cleaning up track out, and properly tuning construction equipment, would reduce potential air quality impacts to a less-than-significant level.

Overall implementation of the project would have a less-than-significant impact on air quality issues in the area.

Impacts Analysis

Construction-related activities associated with the revised project (site cleanup and haul away) would result in potentially significant air quality emissions; however, the 2014 MND incorporated mitigation measure MM-1, which when implemented as part of the revised project, would reduce construction-related air quality impacts to a less-than-significant level.

The revised project would not alter operation-related air quality emissions; therefore, the analysis in the 2014 MND for operation-related air quality impacts would apply to the revised project.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2014 MND would reduce impacts to air quality within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.4 Biological Resources

The amount of potential habitat in the project area is minimal and of low quality especially as it pertains to wildlife usage due to its highly disturbed nature. The high level of disturbance and lack of native plant communities in the project area excludes the majority of the special status plants and animals known to occur in the vicinity of the project. The project area consists only of disturbed land and does not include any riparian habitat or other sensitive natural communities. No wetlands were identified in the project area.

Overall implementation of the project would have a less-than-significant impact on biological resources in the area.

Impacts Analysis

The 2014 MND identified mitigation measure MM-2 to reduce potential impacts to avian species protected by the Migratory Bird Treaty Act (MBTA) by requiring the MCOE to schedule tree removal and construction activities to occur prior to the beginning of nesting activity or after fledging, or take other actions if project activities occur during the nesting season. Implementation of mitigation measure MM-2 would reduce impacts to a

less-than-significant level. Mitigation measure MM-2 would apply to the revised project and would reduce impacts to avian species protected by the MBTA to a less-than-significant level.

Like the project, the revised project would not impact riparian habitat or other sensitive community as none are present on the project site. Nor will the project impact any protected wetlands.

The revised project would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2014 MND would reduce impacts to biological resources within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.5 Cultural Resources

The 2014 MND describes the cultural resources setting based on information on prehistoric and historic archaeological resources and historic structure information in and adjacent to the project. No historical cultural resources would be impacted by the project. Overall implementation of the project would have a less-than-significant impact on cultural resources.

Impacts Analysis

The revised project is located within the study boundary for the original project and its location was evaluated in the 2014 MND. Because the footprint for the revised project is consistent with the 2014 project, the analysis presented in the cultural resources section of the 2014 MND covers cultural resources that could potentially be impacted by revised project. Mitigation measure MM-3 identified in the 2014 MND would reduce temporary and permanent impacts to cultural resources due to project (original or revised) implementation. Mitigation measure MM-3 requires that if archaeological resources or human remains are found during construction activities that work within 50 feet of the find shall cease until it can be evaluated and appropriately treated, if significant. Implementation of mitigation measure MM-3 would reduce impacts to cultural resources to a less-than-significant level. The revised project would continue to result in no impacts to historical cultural resources.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2014 MND would reduce impacts to cultural resources within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.6 Geology and Soils

The geology and soils analysis in the 2014 MND are based on the analysis in the Geologic Hazards Assessment, prepared by Padre Associates in November 2013. The 2014 MND addressed potential geophysical impacts which involve geologic and soil conditions and their potential to create physical hazards affecting persons or property; or

substantial changes to the physical condition of the site. Included are earthquake-related conditions such as fault rupture, groundshaking, liquefaction (a condition in which saturated soil loses shear strength during earthquake shaking); unstable soil or slope conditions, such as landslides, subsidence, expansive or compressible/collapsible soils; or erosion; and extensive grading or topographic changes.

Overall implementation of the project would have a less-than-significant impact on geology and soils issues in the area.

Impacts Analysis

The 2014 MND found that the project is subject to potentially significant but mitigable impacts associated with exposure of people or structures to risk of loss, injury, or death involving unstable earth conditions due to seismic related ground failure, including liquefaction. This analysis finds the same potentially significant impacts would be associated with the revised project. Implementation of mitigation measure MM-4, which requires the preparation of a site-specific subsurface exploration and geotechnical analysis, will reduce the revised project related geology and soils impacts to less than significant.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2014 MND would reduce impacts to geology and soils within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.7 Greenhouse Gas Emissions

The greenhouse gas emissions analysis in the 2014 MND is based on the results from the CalEEMod Greenhouse Gas Estimator that was modeled for the project. The emissions estimator did not identify any significant impacts associated with GHG and the construction and operation of the project. As discussed in the 2014 MND, the MBUAPCD does not have an adopted threshold of significance for construction-related GHGs; however, feasible best management practices should be implemented to reduce GHG emissions during construction. Implementation of mitigation measures MM-5 and MM-6 would ensure construction-related impacts would be less than significant. Mitigation measure MM-5 requires the implementation of best management practices, such as the use of alternative fuel, utilizing local materials, and recycling construction debris. Mitigation measure MM-6 requires the MCOE to complete the CalEEMod Greenhouse Gas Estimator to ensure that construction and operation of the site will not result in significant GHG impacts. Implementation of mitigation measures MM-5 and MM-6 would result in less-than-significant GHG impacts.

Overall implementation of the project would have a less-than-significant impact on GHG emissions in the area.

Impacts Analysis

The revised project would involve the cleanup of the project site and haul away of materials. The revised project would require the operation of construction equipment, excavation activities, and haul away of approximately 1,200 cubic yards of excavated soils. A CalEEMod Greenhouse Gas Estimator was completed for the revised project,

and the results can be found in Appendix A of this Addendum. Note that the CalEEMod model assumed that all of the 1,200 cubic yards of excavated material would be transported to the Kettleman Hills Hazardous Waste Facility. If the excavated materials are determined to be non-hazardous waste, the materials can be disposed of at landfills/facilities within closer proximity to the project site and off-site hauling CO_2e emissions would be less than the values reported below.

The total construction-related GHG emissions for the revised project were estimated at 38 metric tons (MT) CO_2e per year. The 2014 MND identified that the project would result in 175 MT CO_2e/year. The revised project would result in an increase of 38 MT CO_2e/year (total of 213 MT CO_2e/year). Construction emissions amortized over the assumed lifetime of the project (i.e., 30 years) would be 1.3 MT CO_2e per year. Operational GHG emissions associated with the revised project would not differ from the operational GHG emissions evaluated in the 2014 MND. Implementation of mitigation measures MM-5 and MM-6 would ensure revised project impacts associated with construction-related GHG emissions would be less than significant.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2014 MND would reduce impacts to GHG emissions to a less-than-significant level. No new mitigation measures would be required.

5.1.8 Hazards and Hazardous Materials

The 2014 MND analyzed the potential for the project to create health or safety impacts from exposure of persons or the environment to hazardous materials or risk of accidents involving combustible or toxic substances. The 2014 MND documented that several chemicals of potential concern were detected at levels in excess of acceptable levels. The 2014 MND identified the need for further coordination with DTSC during the remediation process. The 2014 MND identified mitigation measures MM-7 (remediation action and coordination with DTSC) and MM-8 (pipeline risk assessment).

Overall implementation of the project would have a less-than-significant impact on hazards and hazardous materials in the area.

Impacts Analysis

The revised project (site cleanup and haul away) would satisfy mitigation measure MM-7, which identifies the remediation action for the project site. The revised project would remove any potential contaminants from the soils, which would result in a beneficial impact related to health and safety. The revised project would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur. The revised project would implement the mitigation measures identified in the 2014 MND thereby reducing impacts to hazards and hazardous materials within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.9 Hydrology and Water Quality

The 2014 MND provides a discussion and analysis of potential impacts to hydrology and water quality due to implementation of the project. The project included the development of biofiltration swales for stormwater retention and biofiltration prior to discharge the City's drainage system. The project would not use or impact groundwater resources. The project would not be located within a 100-year flood hazard area.

The 2014 MND identified MM-9, which requires the MCOE to design and construct on-site drainage compliant with the State of California general permit and the City of Salinas's Phase I permit requirements.

Overall implementation of the project would have a less-than-significant impact on hydrology and water quality issues in the area.

Impacts Analysis
The revised project (site cleanup and haul away) would result in similar hydrology and water quality impacts as the project evaluated in the 2014 MND. The revised project would involve excavation, similar to the construction activities evaluated in the 2014 MND. The revised project would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2014 MND would reduce impacts to hydrology and water quality within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.10 Land Use and Planning

The 2014 MND assessed land use compatibility. The 2014 MND concluded the project would not create any physical barriers that would divide the community. As such, no impact would occur. Based upon the 2014 MND land use and planning analysis and lack of conflict with applicable land use plans, policies, and regulations, the proposed project would result in a less-than-significant impact related to conflicts with land use plans and policies.

Impacts Analysis
The revised project (site cleanup and haul away) would result in similar land use and planning impacts as the project evaluated in the 2014 MND. The revised project would not result in impacts not previously evaluated in the 2014 MND. The revised project's potential for an environmental impact resulting from an inconsistency with applicable land use plans and policies is less than significant.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.11 Mineral Resources

The 2014 MND determined that the project site is not located in an area historically used for mineral resource extraction or as a mineral resource recovery site. The City of

Salinas historically extracted minerals; currently there are no longer any significant mineral resources being mined. The 2014 MND found that no direct impacts to mineral resources would occur due to the project.

Impacts Analysis
The revised project (site cleanup and haul away) would not result in mineral resources impacts, consistent with the analysis in the 2014 MND. The revised project would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.12 Noise

The 2014 MND noise analysis noted that construction activities would result in a temporary increase in ambient noise levels but would be less than significant. The 2014 MND identifies mitigation measure MM-10, which requires noise suppression attachments to construction equipment. Operational noise levels are not expected to exceed noise level standards for the City of Salinas. Because construction activities associated with the project would be required to comply with the applicable regulations for construction, temporary increases in noise levels from construction activities would be less than significant. Additionally, because the operational noise levels are not anticipated to exceed City of Salinas noise standards, the project would result in less-than-significant operational noise impacts.

Impacts Analysis
The revised project (site cleanup and haul away) would require the operation of construction equipment associated with excavation of the project site and operation of haul-away trucks and mitigation measure MM-10 would apply to the revised project. The revised project would not result in new operational noise impacts. The revised project would result in similar noise impacts as the project evaluated in the 2014 MND and would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur. The revised project would implement the mitigation measure identified in the 2014 MND thereby reducing impacts to noise within the project area to a less-than-significant level. No new mitigation measures would be required.

5.1.13 Population and Housing

The 2014 MND determined that the project would not be growth-inducing as the project would relocate an existing MCOE program, which is located 0.5 mile away from the project site. No impacts to population or housing were identified in the 2014 MND.

Impacts Analysis
Like the 2014 project, the revised project (site cleanup and haul away) would not be growth-inducing and would not result in impacts to population or housing. The revised project would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.14 Public Services

The 2014 MND evaluated the project's effects on fire and police protection services, schools, road maintenance and other governmental services. The 2014 MND determined that the project would not result in the need for new or altered public service facilities and/or additional staffing to service the project.

Impacts Analysis
Similar to the 2014 project, the revised project (site cleanup and haul away) would not result in any impacts on local public services such as fire protection, police protection, schools, or other public facilities.

No new or substantially more severe significant impacts would occur and no additional mitigation measures would be required.

5.1.15 Recreation

The 2014 MND analysis determined that the project would not increase the use of recreational facilities, nor include or require construction or expansion of recreational facilities that will result in an adverse effect on the environmental.

Impacts Analysis
Like the 2014 project, the revised project (site cleanup and haul away) would result in no change related to demand for recreational facilities. The revised project would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.16 Transportation/Traffic

Since 2014 the CEQA Guidelines have been revised and have modified the impacts discussion for the Transportation issue. According to the revised Appendix G Environmental Checklist, the project, as revised, would have a significant impact if, it were to:

a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
d. Result in inadequate emergency access?

The 2014 MND transportation analysis identified one significant impact at the study intersection Natividad Road/Leslie Drive. Mitigation measures MM-11 and MM-12 were developed to bring the LOS for the intersection up to City Standards for the weekday AM peak hour. Implementation of mitigation measures MM-11 and MM-12 would reduce impacts to a less-than-significant level, further supporting the less-than-significant impact finding for Transportation criterion (b). The 2014 MND found that the unsignalized Natividad Road/Saratoga Drive intersection did not meet the peak hour signal warrant and was not considered a significant impact. The 2014 MND assumed that 30 percent of the students will be using public transit, walking or biking to the school each day, which supports Transportation criterion (a).

In response to Transportation criterion (c), site ingress/egress would be designed at Leslie Drive with safety in mind and will include necessary signage to maintain a safe environment for vehicle and pedestrian transportation. Street design will not be changed as a part of the project.

In response to Transportation criterion (d), the project would be designed to ensure adequate emergency access to all school facilities; the Fire Marshal will give formal approval to the Fire/Life/Safety Plan for the project at the time of Division of the State Architect (DSA) Back Check.

Impacts Analysis
The revised project (site cleanup and haul away) would introduce construction equipment, worker vehicles, and haul trucks during the remediation action. Activities evaluated in the CalEEMod run for the revised project include excavation and off-site disposal/haul away of 1,200 cubic yards of impacted soil, 99 truckloads for transporting excavated soils (each trip a distance of 136 miles round trip), and 20 days of soil removal and haul away. Operation of construction equipment, worker vehicles, and haul trucks would be temporary and would not permanently impact the intersection and road segment operation. The revised project would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur. Implementation of the mitigation measures identified in the 2014 MND would reduce transportation impacts to a less-than-significant level. No new mitigation measures would be required.

5.1.17 Utilities and Service Systems

The 2014 MND indicated that adequate sewer, water, and electrical supplies are available to serve the project and that no expansion of existing facilities or construction of new facilities would be required.

Impacts Analysis
The revised project (site cleanup and haul away) would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures are required.

5.1.18 Mandatory Findings of Significance

The 2014 MND indicated that the project did not have the potential to degrade the quality of the environment or reduce the habitat of fish or wildlife species or eliminate important examples of California history or prehistory with the implementation of mitigation measures MM-1 through MM-12. With the implementation of the mitigation measures, the project would result in a less-than-significant impact.

The 2014 MND also indicated that the impacts of the project were individually limited and not cumulatively considerable with the implementation of mitigation measures MM-1 through MM-12.

The 2014 MND indicated that the project with implementation of mitigation measures MM-1 through MM-12 will not cause substantial adverse effects on human beings.

Impacts Analysis
The revised project (site cleanup and haul away) would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur and no additional mitigation measures would be required.

6 Resource Evaluations Not Previously Considered in the 2014 MND

The applicable CEQA Guidelines at the time the 2014 MND was prepared did not include resource sections for the evaluation of energy, tribal cultural resources, or wildfire. The current CEQA Guidelines Appendix G requires the evaluation of these resources. The following analysis of the revised project is included consistent with recent revisions to the CEQA Guidelines.

6.1.1 Energy

Thresholds of Significance

Under the current CEQA Guidelines Appendix G Environmental Checklist, the project as revised would be expected to have a significant impact on energy use if it demonstrably resulted in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation or conflict or obstruct a state or local plan for renewable energy or energy efficiency consistent with the CEQA Guidelines Appendix G Checklist.

As defined in the CalEEMod results included as Appendix I of the 2014 MND, the project would exceed Title 24 standards and install high efficiency lighting. Title 24 is designed to provide certainty and uniformity throughout California while ensuring that the efficient and non-wasteful consumption of energy is carried out through design features. Adherence to Title 24 is deemed necessary to ensure that no significant impacts occur from the inefficient, wasteful, and unnecessary consumption of energy. The project would be compliant with Title 24; therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Energy efficiency is not "new information of substantial importance which was not known and could not have been known" at the time of the 2014 MND approval because energy efficiency and construction requirements have continued to evolve in California. Because this impact is not significant and energy efficiency is not "new information" within the meaning of Public Resources Code Section 2116 and State CEQA Guidelines Section 15162, none of the triggers under those sections requiring the preparation of a Subsequent IS/MND are fulfilled with regard to this issue.

Impacts Analysis

The revised project (site cleanup and haul away) would not modify the design, layout, or energy efficiency of the proposed structures; therefore, the revised project would not result in impacts not previously documented in the 2014 MND. Energy impacts associated with the revised project would be less than significant.

No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the revised project.

6.1.2 Tribal Cultural Resources

Thresholds of Significance

Consistent with the revised CEQA Guidelines Appendix G Checklist, the project, as revised, would be considered to have a significant impact on tribal cultural resources if it were to cause a substantial adverse change in the significance of a tribal cultural resource as 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 Resource 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.

In general, direct and indirect project impacts to tribal cultural resources would occur when a series of actions leads to the loss of a substantial type of 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. The 2014 MND identified mitigation measure MM-3 that requires if cultural resources are encountered during site grading or other construction activities, all work shall be halted within 50 feet of the discovery and MCOE shall engage a qualified archaeologist to assess and protect the discovery, as appropriate. No further soil disturbance shall occur within the 50-foot buffer until the assessment has been completed.

Potential project-related impacts to undocumented tribal cultural resources are reduced to less than significant by implementation of resource protective construction monitoring

for potential discovery and handling of tribal cultural resources and treatment of remains in MM-3. In addition, established procedures will be followed for the treatment of tribal cultural resources and human remains consistent with Public Resources Code Section 5097.98.

Impacts Analysis
The revised project (site cleanup and haul away) would occur within the previously evaluated 2014 project footprint and would not result in impacts not previously documented in the 2014 MND.

No new or substantially more severe significant impacts would occur and therefore no new mitigation measures would be required with implementation of the revised project.

6.1.3 Wildfire

Thresholds of Significance
If located near a state responsibility area or lands classified as very high fire hazard severity zones, the project would have a significant impact if it were to:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan.
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire.
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

The project site is located in a designated Local Responsibility Area (LRA) on the California Department of Forestry and Fire Protection Fire Hazards Severity Zone Map (CALFIRE, November 4, 2008). The project site is located in an area designated as a Non-Very High Fire Hazard Severity Zone. Additionally, Salinas Fire Department Station No. 2 is located approximately 1.7 miles from the project site and could respond to incidents on-site quickly. The 2014 MND analysis determined that the project would not expose people or structures to a significant loss, injury, or death involving wildland fires.

Impacts Analysis
The revised project (site cleanup and haul away) would not result in impacts not previously evaluated in the 2014 MND.

No new or substantially more severe significant impacts would occur and therefore no mitigation measures would be required with implementation of the revised project.

Appendix A

Revised Project CalEEMod Results